Lime Down
Solar Park

The Applicant's Response to the Examining Authority's First Written Questions

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1 Introduction

1.1 Purpose of the Document

1.1.1 This report sets out the Applicant's response to the Examining Authority's (ExA) first written questions, issued on 29 May 2026 **[PD-010]**.

1.1.2 In some cases where the Examining Authority has requested further information, the Applicant has deferred a response to the next deadline in order that a full response can be provided. Where this is the case, this is set out in this document.

1.2 Structure of the Report

1.1.3 Section 2 of this report is tabulated to include the ExA's questions and a response to each question as follows:

- Air Quality and Emissions
- Assessment of Alternatives
- Compulsory Acquisition, Temporary Possession and Other Land or Rights Considerations
- Climate Change
- Cultural Heritage
- Cumulative Effects
- The Draft Development Consent Order
- Ecology and Biodiversity
- Flood Risk, Hydrology and Water Resources
- General and Cross-Topic Questions
- Habitat Regulations Assessment
- Health and Wellbeing
- Landscape and Visual
- Land Use, Soils and Food Security
- Noise and Vibration
- Resource and Waste Management
- Socio-Economic
- Transportation, Traffic and Highway Safety
- Other Environmental Matters

1.1.4 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.

1.1.5 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

2 Written Questions

2.1 Air Quality and Emissions

ExQ	Respondent	Question	Applicant's Response
AQ1.1	The Applicant Wiltshire Council	**Battery Energy Storage System (BESS) Worst Case Scenario and Plume Modelling** The Applicant: 1) The applicant is asked to advise how you have determined the worst-case scenario with respect to a single battery energy storage system (BESS) container catching fire. You are asked to detail how this has been informed and what makes it the worst-case scenario, especially as evidence submitted by IPs (too many to list) would suggest that this underplays the worst-case scenario. Your reply should go beyond that set out in ES Appendix 15-2 [APP-239] 2) What assessments has the applicant carried out to ensure common mode failures do not occur which could lead to multiple containers catching fire simultaneously? Common mode failures could include, but are not limited to,	1) Worst-case scenario definition and justification For the purposes of the Battery Energy Storage Systems (BESS) fire emissions modelling presented in **ES Volume 3, Appendix 15-2: BESS Fire Emissions Modelling (Rev 2) [REP2-013]**, the worst-case scenario is defined as a fully developed fire within a single BESS container, representing the maximum credible emission scenario supported by available evidence, including Large Scale Fire Testing (LSFT) and industry operational experience. As now mandated under NFPA 855 (2026) the Applicant will only be able to select a BESS system that has undertaken LSFT (Ref 1). At the detailed design stage, the selected BESS LSFT data will be leveraged to fully inform inputs for risk assessment tools which will be utilised together with detailed consequence

ExQ	Respondent	Question	Applicant's Response
		external factors outside the control of the applicant. 3) Can the applicant list all the layers of protection the BESS would have in place to prevent a fire of a single container (and spread to other containers). From a quantitative risk assessment perspective, what assurances and/or numerical evidence can the applicant provide that the likelihood of such a scenario and that of multiple containers catching fire are both at a level low enough that would generally be considered acceptable. 4) Provide further explanation as to why the Lithium Iron Phosphate (LiFePO4) (known as 'LFP') technology is considered to be a reasonable worst case scenario for the purposes of the plume assessment and outline Battery Safety Management Plan (oBSMP) [REP1-110]. Explain whether, and if so how, the approach to battery safety would differ if a different lithium-ion battery technology was used (such as Lithium-Nickel-Manganese-Cobalt-Oxide). <u>Wiltshire Council:</u> With respect to fire emissions and plume modelling, what is the Council's position	modelling to provide a comprehensive site operations and emergency response safety audit, this is stipulated in the **Outline Battery Safety Management Plan (BSMP) [REP1-110]** pre-construction requirements (Section 6). The available LSFT evidence for modern BESS systems demonstrates that, where appropriate design measures are in place (such as enclosure spacing, thermal insulation and cooling systems), fire propagation is prevented and damage is contained to a single enclosure. This is consistent with the **Outline BSMP [REP1-110]**, which requires that LSFT demonstrates that loss is safely limited to a single BESS enclosure without intervention, thereby providing an evidence-based basis for defining the worst-case scenario. Multiple BESS enclosures catching fire simultaneously has not occurred in real world BESS failure incidents to date and should be considered a highly improbable worst-case scenario. Reports such as the **Intertek CEA: Global Energy Storage Manufacturing Quality Report 2026** highlight critical BESS

ExQ	Respondent	Question	Applicant's Response
		regarding acceptance of the applicant's assessment methodology and conclusions, as detailed in [APP-239].	system safety issues and demonstrates how corrective actions should be taken before a failure incident can occur (Ref 1). Real-world, worst-case BESS fire events have generally resulted in propagation to one adjacent enclosure (i.e. two containers involved). The most extensive recorded propagation involved four containers at Lyme, New York; however, this event related to legacy Lithium Nickel Manganese Cobalt Oxide (NMC) pouch cell systems using air-cooled modules, which are fundamentally different to those proposed for the Scheme. Such historic incidents were associated with BESS installations that had not undertaken LSFT and were not designed in accordance with current standards (e.g. NFPA 855 and UL 9540). Section 4.1.30 of the **Outline BSMP [REP1-110]** stipulates the selected BESS design will integrate: "*Battery liquid cooling systems with automated fail-safe operation (air cooling systems will not be considered for the Scheme)*."

ExQ	Respondent	Question	Applicant's Response
			Accordingly, while propagation between containers has occurred historically, this has been in the context of legacy system designs. 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), 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 to 3.5 metres across from the next row / block of BESS enclosures. These current BESS designs integrate high levels of thermal insulation to prevent a fire from 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.

ExQ	Respondent	Question	Applicant's Response
			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 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 application. LSFT involves deliberately burning a complete BESS enclosure to evaluate thermal exposure, heat release rates, burn duration, maximum temperatures and, critically, the potential for fire propagation to adjacent BESS or associated equipment. The purpose of this testing is expressly to validate minimum equipment spacing and to demonstrate that cascading or multi container ignition does not occur where tested layouts and mitigation measures are implemented. These tests therefore explicitly address the type of multi-BESS fire propagation risks, including scenarios observed in real world incidents, by requiring evidence that propagation risk is

ExQ	Respondent	Question	Applicant's Response
			controlled through design rather than reliance on emergency intervention. Accordingly, the worst-case scenario as set out in **ES Volume 3 Appendix 15-2 BESS Fire Emissions Modelling (Rev 2) [REP2-013]** has been defined on the basis of the most severe credible outcome supported by empirical test evidence and real-world data, rather than by combining multiple unsubstantiated failure mechanisms. The use of a single fully involved BESS container reflects the maximum achievable emission scenario demonstrated by LSFT and therefore provides a robust and conservative basis for plume modelling. This approach has been informed by consideration of LSFT evidence, current industry standards and real-world incident data. It therefore does not underplay the worst-case scenario but instead ensures that the assessment remains evidence-based, proportionate and aligned with the design and safety requirements secured through the **Outline BSMP [REP1-110]**.

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			2) Assessment of common mode failures The Applicant regularly evaluates BESS system defect and root cause analysis reports to inform all critical aspects of BESS safety required for procurement, construction, installation, commissioning, and decommissioning phases of projects. Factory Acceptance Testing (FAT) and Site Acceptance Testing (SAT) are key components in ensuring credible BESS failure scenarios (including external BESS site fire risks) are prevented and fully mitigated should they occur. LSFT as mandated in NFPA 855 (2026) involves deliberately burning a complete BESS enclosure to evaluate thermal exposure, heat release rates, burn duration, maximum temperatures and, critically, the potential for fire propagation to adjacent BESS or associated equipment (Ref 1). The purpose of this testing is expressly to validate minimum equipment spacing and to demonstrate that cascading or multi container ignition does not occur where tested layouts and mitigation

ExQ	Respondent	Question	Applicant's Response
			measures are implemented. These tests therefore explicitly address the type of multi-BESS fire propagation risks, including scenarios observed in real world incidents, by requiring evidence that propagation risk is controlled through design rather than reliance on emergency intervention. Fire hazards i.e. burning thermal runaway events in BESS systems, are driven by identical factors. Variations in burn out times are significantly influenced by failure scenarios, State of Charge (SOC) and battery rack configurations and materials. Cell and module propagation times during thermal runaway is driven by heat generated through internal current flow, parallel circuits, damaged circuitry and wiring, additional battery module and BESS enclosure combustibles, and internal / external module heating from vented gases and flames. The Applicant emphasises that generalisations and claims regarding the safety of specific battery chemistries should be disregarded.

ExQ	Respondent	Question	Applicant's Response
			Predictions of gas properties and volumes from a battery chemistry or form factor is unwise. Testing on actual BESS cells and battery systems is the only way to accurately define gas production which will inform the fire and explosion risk for a specific battery system. UL 9540A testing defines specific battery vent gas mixtures, maximum burn velocity, maximum explosion pressure (Pmax), and duration of flaming. Fire / combustion data recorded during testing is Peak Heat Release Rate (PHRR), Heat Release Rate (HRR), Total Heat Release (THR), cell propagation rates, temperatures within modules, and deflagration event data i.e. debris or shrapnel (if observed). Gas composition defines burning velocity, flaming / explosive limit ranges, and overpressure levels which could be generated in an explosive event. Exposure of battery cells to higher levels of heat tends to generate higher volumes of gas.

ExQ	Respondent	Question	Applicant's Response
			Section 4 of the **Outline BSMP [REP1-110]** documents the critical layers BESS safety requirements for the Scheme, these cover all aspects of safe BESS design, safe BESS construction, and safe BESS operation to prevent and fully mitigate a BESS failure event. Final comprehensive risk assessment reports, BESS design and site-specific consequence modelling, and detailed Emergency Response Plans (ERPs) can only be drafted when based upon the specific BESS design selected at the detailed design stage. Key safety content requires that all equipment within the BESS area is defined, battery system operating limits and test data are fully defined, and the BESS failure protection system is defined. Incident response tactics require significant test data and rigorous consequence modelling from the specific BESS design to develop safe protocols for incident response. Sections 6.1.3, 6.1.4 and 6.1.5 of the **Outline BSMP [REP1-110]** mandate the key risk

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			analysis reports (FMEA, LOPA, HMA, HAZID, HAZOP) which consider how to prevent and mitigate a multi-BESS failure incident. These reports must be provided at the detailed design stage and are BESS system and site layout specific. These types of risk analysis provide confidence to demonstrate that under day-today operation there is a low risk of a BESS failure incident, and in the event of an incident the credible hazards are understood and have been evaluated both at the illustrative and detailed design stages to demonstrate that the risk to site operatives, first responders, and the local population remains very low. The Applicant will also commission site specific heat flux and flame tilt consequence modelling to account for site topography and wind conditions to establish final equipment spacing distances for the Scheme. <u>3) Layers of protection and risk acceptability</u> The Scheme incorporates multiple independent layers of protection, consistent with a defence-in-depth approach. These

ExQ	Respondent	Question	Applicant's Response
			aspects are set out in the **Outline BSMP [REP1-110]** which is secured through Requirement 6 of Schedule 2 of the **Draft DCO [REP1-007].** The **Outline BSMP [REP1-110]** confirms that the BESS will integrate multiple layers of prevention and mitigation in accordance with the HSE hierarchy of controls, including elimination, engineering controls and operational safeguards. Section 4 of the **Outline BSMP [REP1-110]** documents the critical layers BESS safety requirements for the Scheme, these cover all aspects of safe BESS design, safe BESS construction, and safe BESS operation to prevent and fully mitigate a BESS failure event. Final comprehensive risk assessment reports, BESS design and site-specific consequence modelling, and detailed Emergency Response Plans (ERPs) can only be drafted when based upon the specific BESS design selected at the detailed design stage. Key safety content requires that all equipment within the BESS

ExQ	Respondent	Question	Applicant's Response
			area is defined, battery system operating limits and test data are fully defined, and the BESS failure protection system is defined. Incident response tactics require significant test data and rigorous consequence modelling from the specific BESS design to develop safe protocols for incident response. Section 6.1.1 of the **Outline BSMP [REP1-110]** stipulates: "T*he detailed design phase of the Scheme will consider the lifecycle of the battery system from installation (during the construction phase of the Scheme) to decommissioning. At the detailed design stage, the selected BESS will have undertaken Large Scale Fire Testing (LSFT) to fully inform inputs for risk assessment tools which will be utilised together with detailed consequence modelling to provide a comprehensive site operations and emergency response safety audit.*" The battery system mitigation measures adopted in the final BSMP will reflect the latest BESS safety codes and standards applicable at that stage. This ensures that risk is

ExQ	Respondent	Question	Applicant's Response
			minimised and mitigation measures will be discussed and coordinated with D&WFRS. Sections 6.1.3 and 6.1.4 of the **Outline BSMP [REP1-110]** mandate the key risk analysis reports which consider how to prevent and mitigate a multi-BESS failure incident. These reports must be provided at the detailed design stage and are BESS system and site layout specific. The Applicant will also commission site specific heat flux and flame tilt consequence modelling to account for site topography and wind conditions to establish final equipment spacing distances for the Scheme. Section 6.1.3 of the **Outline BSMP [REP1-110]** outlines key quantitative risk analysis which will be conducted at detailed design: *"As stipulated in NFPA 855 (2026), a Failure Modes and Effects Analysis (FMEA) of the BESS (BS EN IEC 60812) or Layer of Protection Analysis (LOPA) of the BESS will be conducted to lay the foundation for predictive maintenance requirements and complement the fault indicator capabilities of the BMS data*

ExQ	Respondent	Question	Applicant's Response
			analytics system. This key analysis minimises the probability of a BESS failure in relation to the specific BESS system and site design and analyses key mitigation solutions to minimise the impact of a BESS failure in the unlikely event that this would occur. These types of risk analysis provide confidence to demonstrate that under day-today operation there is a low risk of a BESS failure incident, and in the event of an incident the credible hazards are understood and have been evaluated both at the illustrative and detailed design stages to demonstrate that the risk to site operatives, first responders, and the local population remains very low." As outlined in Section 6.1.4 of the **Outline BSMP [REP1-110]**, comprehensive Hazard Mitigation Analysis (HMA) will be conducted by a BESS specialist independent Fire Protection Engineer following NFPA 855 (2026) guidelines and recommendations to cover BESS system and site-specific safety issues (Ref 1). The **Outline BSMP [REP1-110]** requires that LSFT and, where necessary, full-scale

ExQ	Respondent	Question	Applicant's Response
			destruction testing, combined with site-specific consequence modelling is undertaken to demonstrate that loss will be limited to a single BESS enclosure. This includes validation of equipment spacing and thermal separation distances, with independent review by a specialist Fire Protection Engineer providing additional assurance that fire spread between enclosures is prevented through verified design controls. The Applicant's response to question 1 emphasised that worst-case real-world BESS fire incidents where a BESS fire was not contained to a single BESS enclosure, involved legacy BESS systems which had not undertaken LSFT. Many systems were not compliant with key BESS safety standards, certifications, or codes. The **Outline BSMP [REP1-110]** commits to LSFT and all key BESS safety standards, certifications, and testing, the BSMP must adopt the latest standard revision at the detailed design stage. <u>4) Use of LFP as a reasonable worst case and approach to alternative chemistries</u>

ExQ	Respondent	Question	Applicant's Response
			The illustrative BESS design assessed in the ES and **Outline BSMP [REP1-110]** is based on Lithium Iron Phosphate (LFP) technology, which is considered an appropriate and representative basis for assessment. This reflects both the widespread deployment of LFP systems in current BESS applications and their potential to generate significant volumes of flammable gases (such as hydrogen) and, depending on system design, toxic emissions including hydrogen fluoride (HF) during thermal runaway. As outlined in the **Outline BSMP [REP1-110]** the illustrative BESS system based upon LFP lithium-ion battery technology is considered a reasonable worst case for the purposes of the assessment in terms of safety (toxic and explosive gas production risks). NFPA 855 (2026) now prioritises explosion prevention and mitigation as the key BESS safety priority. The Applicant emphasises that BESS safety cannot be solely defined by battery chemistry, LFP systems can pose a higher explosion risk because they generate higher levels of

ExQ	Respondent	Question	Applicant's Response
			hydrogen gas during thermal runaway compared to NMC systems. Typically, LFP systems could generate higher levels of HF during a BESS failure, but gas mixtures vary significantly across different cell and battery module designs whilst utilising the same battery chemistry. Failure modes and State of Charge (SOC) can significantly impact the BESS failure event in terms of explosive gas generation and toxic emissions. The Applicant's approach to BESS safety is an informed, systems based approach and not a poorly conceived chemistry-based approach. The **Outline BSMP [REP1-110]** comprehensively documents the guidance, standards, testing certifications, risk assessments, consequence modelling reports that will be utilised to minimise the probability of BESS failure event and fully mitigate in the rare event should it occur. Section 6.1 of the **Outline BSMP [REP1-110]** stipulates that: "*The detailed design phase of the Scheme will consider the lifecycle of the battery system from installation (during the construction phase of the Scheme) to*

ExQ	Respondent	Question	Applicant's Response
			decommissioning. At the detailed design stage, the selected BESS will have undertaken Large Scale Fire Testing (LSFT) to fully inform inputs for risk assessment tools which will be utilised together with detailed consequence modelling to provide a comprehensive site operations and emergency response safety audit." If an alternative lithium-ion battery chemistry was selected at detailed design stage, the same testing and assessment requirements would apply, and the plume assessment and safety case would be updated to reflect the specific system test data. Section 5.5.14 of the **Outline BSMP [REP1-110]** confirms that: "*at the detailed design stage a BESS system and site specific Plume Analysis study will be conducted to assess the environmental impact of a site incident to sensitive receptors within a 1 km radius. Toxic gas emissions to sensitive receptors must be below relevant public health exposure limit guidelines when the battery system of a BESS is fully consumed (burnt out), production of Particulate Matter (PM) and a visibility impact*

ExQ	Respondent	Question	Applicant's Response
			assessment on any transport links within a 1 km radius of the BESS area will also be included. The ERP produced at the detailed design stage (template outlined in Section 5.4.4) will incorporate all necessary emergency response procedures and actions based upon thermal runaway test data supplied by the BESS system provider." Section 6.1.7 of the **Outline BSMP [REP1-110]** clarifies that: "*If the BESS system supplied differs from the specification considered for risk assessments and consequence modelling, then a full safety audit will be repeated for the new BESS system specification. These studies will be completed and signed off before construction commences*."
AQ1.2	The Applicant Dorset and Wiltshire Fire and Rescue Service	**BESS oBSMP** The Applicant: In paragraph 4.1.2 of the oBSMP [REP1-110], it states UL 9540A heat flux data will establish safe distances between BESS enclosures and Energy Storage System equipment, following large scale fire testing, however this is followed	**1) Clarification of paragraph 4.1.2 (UL 9540A and conclusive heat flux data)** The Applicant clarifies that **Paragraph 4.1.2** of the **Outline BSMP [REP1-110]** refers to the distinction between earlier UL 9540A testing protocols and the updated requirements under NFPA 855 (2026).

ExQ	Respondent	Question	Applicant's Response
		by the statement '*but will not be conclusive if full propagation of the battery system does not occur in the test*'. The applicant is asked to clarify what they mean by this. The oBSMP also sets out the approach to BESS enclosure suppression systems. The applicant is asked to confirm that each enclosure would have its own fire suppression system in place to reduce the potential for fire risk. If not, why not. Given the expected advances in battery technology over the lifespan of the proposed development please confirm that this document would be updated at each phase of battery replacement for review and agreement by all relevant regulatory bodies at the time of the replacement. Dorset and Wiltshire Fire and Rescue Service: The ExA asks the Fire and Rescue service to review the applicant's oBMSP [REP1-110] and confirm it is content with the applicant's approach and the means of managing a thermal runaway event. Additionally, also provide specific comment on the applicant's	UL 9540A testing undertaken under earlier editions (pre-2026) did not necessarily require full propagation of a thermal runaway event across the entire battery system. Where full propagation does not occur, the resulting heat flux measurements may underestimate the Peak Heat Release Rate (PHRR) and therefore may not represent a conservative worst-case scenario for determining minimum equipment separation distances. In this context, the statement that heat flux data "will not be conclusive" means that, without full system involvement, the test results cannot definitively demonstrate the maximum potential heat release or the spacing distances required under worst-case conditions. UL 9540A (6th Edition, 2026) test protocols now include LSFT, the Applicant will only be able to select a BESS system that has undertaken LSFT as part of UL 9540A testing or accredited 3rd party LSFT test program as confirmed in Section 4.1.3 of the **Outline BSMP [REP1-110]**: "*NFPA 855 mandates that Large Scale Fire Testing (LSFT) which is full scale burn testing of the BESS system to*

ExQ	Respondent	Question	Applicant's Response
		proposed suppression system approach. Please also confirm whether this document should be updated at each phase of battery replacement to reflect advancements in battery technology.	*validate safe equipment spacing, must be conducted and the BESS selected at detailed design must as a minimum have completed this testing under the UL 9540A test program or an accredited 3rd Party LSFT test program i.e. CSA, DNV, TUV SUD, etc.*" (Ref 3). This ensures that heat flux data used to define equipment spacing distances is derived from representative worst-case scenarios involving full propagation. **2) Fire suppression systems at enclosure level** NFPA 855 (2026) identifies explosion prevention and protection to be the primary focus for BESS safety. Automatic fire suppression systems can both increase explosion risks and increase pollution risks from a BESS fire, which is also reflected in NFCC guidance (Ref 1). NFCC guidance states: *It is becoming increasingly common for BESS to be designed and manufactured without any suppression system, and to be specifically*

ExQ	Respondent	Question	Applicant's Response
			designed so that a fire can be contained within the BESS cabinet/enclosure. Even in cases where no water-based suppression system is installed, local water sources will always be needed for exposure protection to limit cabinet-to-cabinet fire spread. *The primary role of a fire suppression system in a BESS is to prevent a fire in the ancillary electrical equipment spreading to the battery modules. It may have a limited effect to protect the BESS from an external fire spreading to it. All claims of performance of suppression systems need to be supported with appropriate evidence for that specific use case.* *The suppression system, regardless of type, will have little effect on a thermal event within the battery cell. Their primary function is to help prevent cell to cell propagation, rather than fully extinguishing a fire in the cell. The suppression system may, however, offer the advantage of dealing with fires occurring elsewhere within the BESS cabinet that are unrelated to the lithium battery.*

ExQ	Respondent	Question	Applicant's Response
			A developer may propose that suppression systems are not required in the design. In such cases, the fire and rescue service should be satisfied that alternative controls are in place to prevent a fire or other thermal event in the BESS cabinet/enclosure of origin, from propagating to adjacent equipment. The Applicant's **Outline BSMP [REP1-110]** fully aligns NFCC guidance and with NFPA 855 (2026) requirements for suppression systems and explosion prevention system requirements. A summary of key **Outline BSMP [REP1-110]** LSFT requirements, suppression system, and explosion protection system performance testing and validation requirements is provided below. Suppression or explosion protection systems will not be considered for BESS integration unless they fulfil these criteria: Section 4.1.32 stipulates: *"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*

ExQ	Respondent	Question	Applicant's Response
			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 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." 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.

ExQ	Respondent	Question	Applicant's Response
			Section 4.1.33 of the **Outline BSMP [REP1-110]** stipulates: "*NFCC (2026) (Ref 1) guidance acknowledges that it is increasingly common for BESS enclosures to be designed without integrated automatic fire suppression systems because high levels of thermal insulation are integrated which allows enclosures to be closely spaced whilst preventing propagation of fire to adjacent BESS. As mandated in NFPA 855 (2026) LSFT and / or full scale destruction testing to establish minimum equipment spacing distances coupled with rigorous site-specific consequence modelling will be conducted to demonstrate that loss will be safely limited to one BESS enclosure without the intervention of D&WFRS.*" Additionally, Section 4.1.34 of the **Outline BSMP [REP1-110]** confirms that: "*Most LSFT test programs do not performance test BESS active protection systems, therefore any BESS explosion prevention or control/protection system will be validated through full scale BESS destruction testing,*

ExQ	Respondent	Question	Applicant's Response
			lean gas mixture testing and requisite pressure testing required by NFPA and EN standards. An independent Fire Protection Engineer specialising in BESS will review all UL 9540A (Ref 3) test results and any additional fire and explosion test and modelling data which has been provided." Section 4.1.32 of the **Outline BSMP [REP1-110]** confirms: "*If a BESS enclosure design does not integrate automatic fire suppression systems and a dry pipe sprinkler or spray system is integrated, then NFCC (2026) (Ref 1) guidance will be followed. Connections to any dry pipe systems that are required to be installed on the BESS Area will be installed in accordance with BS 9990 Nonautomatic firefighting systems in buildings code of practice (Current Edition) (Ref 7) and will be identified in accordance with BS 3251 Indicator Plates for Fire Hydrants (Current Edition) (Ref 8). If a dry pipe system is integrated for the scheme, D&WFRS instantaneous connection points will be located at a safe distance from enclosures and clearly signed for D&WFRS response, in accordance*

ExQ	Respondent	Question	Applicant's Response
			with NFCC guidelines. Water supply for this type of system will be separate from the water supply designated for D&WFRS boundary cooling requirements; Section 4.1.32 of the **Outline BSMP [REP1-110]** clarifies that*: "NFPA 855 (2026) prohibits the use of clean agent or aerosol fire suppression systems (FSS) unless a sprinkler or spray system is also integrated into a BESS enclosure. Clean agent and aerosol fire suppression systems cannot be the primary fire suppression method unless fire and explosion testing with the specific BESS design can demonstrate that use of such systems does not present a deflagration hazard. If an aerosol FSS is integrated into each BESS enclosure, then the system must be designed and certified to discharge specifically, for an 'electrical fault' fire and shall not discharge in any thermal runaway scenario ensuring a gas exhaust system can remain in operation.*" Section 1.1.17 of the **Outline BSMP [REP1-110]** confirms:

ExQ	Respondent	Question	Applicant's Response
			"*The BESS design will include integrated fire and explosion prevention and protection systems. Following key industry safety standards i.e. NFPA 855, UL 9540, BS EN IEC 62933-5-2, and based on comprehensive UL 9540A (2026, 6th Edition) testing. The selected BESS as mandated under NFPA 855 (2026) will have undertaken Large Scale Fire Testing (LSFT) as part of UL 9540A tests and/or 3rd party full scale destruction testing. This testing involves burning the full BESS system to validate safe equipment spacing and performance test active and passive mitigation systems integrated into the BESS design. A BESS system and site-specific Emergency Response Plan (ERP) will be developed at the detailed design stage, based on national and international best practice measures*." Section 2.4 of the **Outline BSMP [REP1-110]** stipulates the key safety objectives for the Scheme with the primary safety objective of the Applicant being: *"Final BESS design and site layout will have been validated through mandatory Large Scale Fire Testing (LSFT) and rigorous consequence*

ExQ	Respondent	Question	Applicant's Response
			modelling to minimise the requirement for any D&WFRS intervention in a thermal runaway incident. LSFT must establish minimum equipment spacing distances that demonstrate there is no fire propagation to adjacent BESS enclosures or ESS equipment. D&WFRS intervention in worst case scenarios would typically be limited to boundary cooling of adjacent BESS and Energy Storage System (ESS) units to prevent the fire from spreading. This strategy will be finalised with D&WFRS and be clearly communicated in the Emergency Response Plan (ERP); *• To ensure that fire, smoke, and any release of toxic gases does not significantly impact site operatives, first responders, and the local community; and* *• To ensure that firewater run-off is contained and tested before release or, if necessary, removed by tanker and treated offsite.*" The Applicant confirms that suppression systems will only be considered at detailed design if fully tested to requisite standards (as described above) and deemed necessary from

ExQ	Respondent	Question	Applicant's Response
			LSFT testing results. Section 4.1.31 - 4.1.34 of the **Outline BSMP [REP1-110]** documents the fire and explosion protection systems that will be integrated or considered at detailed design. A suppression system must not increase explosion risks, increase pollution risks, or create significant life and safety decommissioning risks. The final BESS fire and explosion protection design must be approved in consultation with D&WFRS and signed off by an independent fire protection engineer before construction begins. If a BESS system has only partially been consumed in a thermal runaway scenario, there are significant difficulties and safety concerns to safely discharge, decommission, and transport the BESS from site i.e. the consequences of a battery system fire occurring during transportation away from site or electrical, chemical, and toxic emission hazards faced by operatives tasked with discharging damaged battery systems. Section 5.1.6 of the **Outline BSMP [REP1-110]** outlines the performance requirements for a fire suppression system to be integrated into

ExQ	Respondent	Question	Applicant's Response
			a BESS at detailed design: "*If a dedicated automatic water-based suppression system or TRPP system (engineered to directly access cells within battery modules) is provided within each BESS enclosure this will be tested at UL 9540A installation level or through significant scale third party fire and explosion testing. The suppression or TRPP system will be capable of operating effectively in conjunction with a CCR 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.*" **3) Updating of the BSMP over the project lifecycle** The Applicant confirms that the detailed BSMP, together with the supporting risk assessments and consequence modelling, will be reviewed and updated at each stage of BESS replacement or modification, to reflect the specific technology proposed at that time. Text has been added to Section 6 of the **Outline BSMP [REP1-110]** at Deadline 3 to provide clarity over this matter.

ExQ	Respondent	Question	Applicant's Response
			In addition, **section 6.1.7** of the **Outline BSMP [REP1-110]** requires that, where the BESS system supplied differs from that assessed at the DCO stage, a full safety audit and reassessment must be undertaken prior to construction. This ensures that any future advances in battery technology are appropriately captured and that the safety case remains specific to the characteristics of the installed system. Through this process, the BSMP and associated safety documentation will remain current and reflective of best available technology, and will be subject to review and agreement with the relevant regulatory bodies at the time of each replacement or modification.
AQ1.3	The Applicant Dorset and Wiltshire Fire and Rescue Service	**BESS Thermal Runaway** The Applicant: The oBSMP [REP1-110] states that the BESS area will contain a minimum of two firefighting water storage units of no less than 228,000 litres in capacity, capable of delivering 1900 litres per minute for 4 hours. Can the applicant	The Applicant confirms that the provision of firefighting water (i.e. two tanks of 228,000 litres each, providing 1,900 litres per minute for approximately 4 hours) is not based on a scenario involving thermal runaway across all BESS enclosures.

ExQ	Respondent	Question	Applicant's Response
		advise if the 4 hours of water capacity is modelled on containing a thermal runaway event at a single container or thermal runaway spreading to other, or all 270 containers? Dorset and Wiltshire Fire and Rescue Service: Notwithstanding the applicant's response to the question above, can the Fire and Rescue Service advise where its secondary water source would come from once the on-site water storage units are empty? The Fire and Rescue Service is also asked to provide detail on how many fire appliances it would have available to it at any one time in the likely event of a fire at either a single or multiple containers, and whether it has had any discussions with the applicant and/or local highway authority about emergency access routes to the BESS enclosure	As set out in the **Outline BSMP [REP1-110]**, the BESS design is required to undergo UL 9540A (6th Edition) testing (Ref 3) and LSFT, which demonstrate that, in a credible worst-case scenario, fire propagation is limited to a single BESS enclosure without intervention from the Fire and Rescue Service. The design basis therefore assumes single enclosure involvement, with measures in place to prevent escalation to adjacent units. The firefighting strategy is accordingly based on a defensive approach, whereby water is used primarily for boundary cooling of adjacent enclosures and surrounding infrastructure, rather than for direct application to the affected BESS unit. The 4-hour water capacity therefore represents a conservative provision to support sustained boundary cooling and site response for credible incident scenarios, while also ensuring sufficient capacity for runoff containment and environmental protection. It exceeds the minimum duration set out in NFCC guidance

ExQ	Respondent	Question	Applicant's Response
			(2026), which identifies a lower benchmark of 2 hours at reduced flow rates. The final firefighting water requirements will be confirmed at the detailed design stage through review of system specific fire testing data, consequence modelling, and consultation with the Fire and Rescue Service. BESS site design is fully compliant with NFCC guidance and D&WFRS site access requirements.
AQ1.4	The Applicant	**BESS - Capacity** The Environmental Statement (ES) Chapter 3 Appendix 3-1 [REP1-081] states that the BESS would consist of approximately 270 containers each with a capacity of 5,015 kWh. This would provide a total BESS capacity of 1,354 MWh. 1) With the expected advances in technology, provide an estimate of the likely increases in capacity resulting from the replacement of the batteries over the lifetime of the proposed development and what this might mean for the layout of the BESS and the firefighting water storage requirements.	1) Advances in technology could mean that each battery container would increase its capacity. This could lead to two scenarios: a) Fewer battery containers are required to meet the same MWh capacity; or b) The same number of containers would have a higher MWh capacity. There would not be a circumstance where the number of battery containers would be increased significantly beyond approximately 270 because the number is limited by the **Design Principles and Parameters [REP1A-008]**. In either of the above circumstances there would not be a significant change in the layout of the

ExQ	Respondent	Question	Applicant's Response
		2) As a result of any increased capacity, also confirm that the infrastructure, including substations and cabling, would be sufficient to handle this increase.	BESS as they would still be limited to the design principles and parameters as described in the **Design Principles and Parameters** [**REP1A-008].** As stipulated in the **Outline BSMP [REP1-110]** the firefighting water requirement will be fully assessed at the detailed design stage based upon a comprehensive review of BESS fire and explosion test data for the selected BESS system by an independent Fire Protection Engineer and water storage volumes will be fully agreed with the Fire & Rescue Service. 2) The substations and cabling would not be affected by any change in battery capacity as the change in capacity would only affect the number of hours that the battery can import and export for, not the maximum power, which is what the substations and cables are designed to take. This would remain at 250MW import and 500MW export.
AQ1.5	The Applicant Wiltshire Council	**BESS Impacts on Wildlife, Livestock and Pets**	A BESS thermal runaway event is inherently a low-likelihood occurrence, reflecting the multiple layers of prevention, monitoring and protection incorporated into modern BESS

ExQ	Respondent	Question	Applicant's Response
	Natural England	In the case of a thermal runaway event at the BESS, what effect is this likely to have on animals, including wildlife, livestock and pets? The applicant is specifically asked to include an assessment on horses in its response to take account of the potential effects on equine businesses.	design. The **Outline BSMP [REP1-110]** ensures that no significant off-site impacts will be caused by a thermal runaway event Notwithstanding this, a precautionary assessment of emissions associated with a potential BESS fire has been undertaken and is reported in **ES Volume 3 Appendix 15-2 BESS Fire Emissions Modelling (Rev 2) [REP2-013]**. This assessment considers the dispersion of key pollutants (including carbon monoxide, hydrogen fluoride, hydrogen chloride, hydrogen cyanide, nitrogen dioxide and particulates) using a detailed dispersion modelling approach. The modelling adopts conservative assumptions, including a fire at the worst-case BESS location (i.e. closest to receptors) and presents the highest predicted concentrations over five years of meteorological data. Representative receptor locations were selected based on the closest points of potential public exposure, including nearby residential properties, farm buildings and public rights of way within a 1 km study area. These receptors are expected to represent the locations of greatest potential exposure for both people and animals in the surrounding area.

ExQ	Respondent	Question	Applicant's Response
			The modelling demonstrates that predicted pollutant concentrations at all assessed receptor locations are well below Acute Exposure Guideline Level 1 (AEGL-1) thresholds. AEGL-1 represents the concentration above which only transient and non-disabling effects (such as mild irritation) may occur, with effects being reversible upon cessation of exposure. AEGLs are derived to be protective of the general human population, including susceptible individuals, and are therefore considered to provide a conservative basis for assessing short-term exposure effects. On this basis, the results indicate that significant adverse health effects would not be expected at receptor locations. With respect to animals, including wildlife, livestock, pets and horses, the closest receptors already considered in the assessment include farm buildings and public rights of way. Although the detailed assessment has been undertaken at human receptor locations, these have been selected to represent worst-case exposure positions in the surrounding area. The land use in the vicinity of the Scheme is predominantly agricultural, and no livestock, equine or other receptors have been identified closer to the

ExQ	Respondent	Question	Applicant's Response
			proposed BESS than those already assessed. Additionally, there are no ecologically designated sites within 1km of the proposed BESS. The results are therefore considered to be representative of potential exposure to animals, including horses associated with nearby equine businesses. Given the proximity of the BESS Area to existing ditches, a potential pathway to aquatic and riparian receptors could arise if pollutants released or mobilised during or following a thermal runaway event were able to enter the local ditch and watercourse network. This could include contaminated firefighting or suppression water, spills or leaks from affected equipment, and pollutants, debris or sediment mobilised within incident runoff. This risk will be controlled through the treatment, interception, containment and isolation arrangements set out in **9.8 Firewater Containment and Drainage Strategy – Lime Down D Battery Energy Storage System [REP1-124]**, supported by **ES Volume 3, Appendix 11-6: Flood Risk Assessment and Drainage Strategy – Lime Down D / BESS [REP1-047]**, **7.11 Water Framework Directive Assessment (Rev 2) [REP1-094]**

ExQ	Respondent	Question	Applicant's Response
			and **7.21 Outline Battery Safety Management Plan (Rev 2) [REP1-110]**. During an incident, the drainage system will be isolated so that potentially contaminated liquids and runoff are retained within the containment system. Retained water will be inspected and tested before an appropriate management route is selected. It will only be discharged where testing confirms that it is suitable and any applicable regulatory requirements are satisfied. Where contamination is identified, retained liquids will be removed by tanker for treatment or disposal at an appropriately permitted facility. On this basis, uncontrolled discharge of pollutants to nearby ditches or watercourses is not anticipated. It is acknowledged that interspecies differences in respiratory sensitivity introduce some uncertainty when applying human health benchmarks to animals. For example, as high flow breathers, horses are more sensitive to air pollutants than humans, so they move more four times more air than a human per minute. However, the distances involved and the conservative nature of the modelling and AEGL framework, effects are not expected to exceed those identified by the AEGL-1 based

ExQ	Respondent	Question	Applicant's Response
			assessment. On this basis, significant adverse health effects to equine receptors are not anticipated. It is also recognised that animals may exhibit behavioural responses during a fire incident, such as avoidance of smoke or temporary agitation. Appropriate measures to minimise potential exposure, including communication and response procedures, will be set out within the Emergency Response Plan. In conclusion, the assessment demonstrates that, in the unlikely event of a BESS thermal runaway fire, no significant adverse effects on wildlife, livestock, pets or horses are expected at off-site locations. The Applicant is undertaking an assessment to cover impacts to equine health and on equestrian businesses closely affected by the Scheme. For the purpose of ensuring the report is sufficiently detailed and proportionate, the Applicant proposes to scope this assessment to equestrian businesses within 2 km of the Scheme or otherwise as identified in **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptors [APP-241**] as likely to experience effects from the construction and operation of the Scheme.

ExQ	Respondent	Question	Applicant's Response
			Due to the scope of assessment and information gathering requested and the need to gather information directly from affected equestrian facilities to guide an economic assessment of impacts, this report is due to be prepared for submission at Deadline 4.

2.2 Assessment of Alternatives

ExQ	Respondent	Question	Applicant's Response
ALT1.1	The Applicant	Site Selection Criteria The applicant's Site Selection Assessment Report [APP-185] details a range of initial sites that were considered for a solar farm with a specific search criteria. However, having not identified a suitable and available site within the parameters identified in Stages 1 - 4 the applicant widened the criteria at Stage 5 to include Grade 3 best and most versatile (BMV) agricultural land and land within flood zones 2 and 3 and Stage 6 to include land with a higher gradient. However, it is not clear if these criteria were re-applied to those areas previously considered to ensure a consistent approach. You are asked to explain this apparent lack of consistency in approach to site selection. If necessary, re-apply a consistent approach to all considered sites and update the Site Selection Assessment Report [APP-185], the Planning Statement [APP-267] including Annex C – Sequential and Exception Test, and relevant parts of the ES as appropriate.	The Applicant considers its approach to the consideration of alternative Potential Development Areas (PDAs) in its site selection assessment report to be proportionate. The assessment first focussed on less constrained land at Stage 2 and identified PDAs 1-4 for assessment. PDAs 1-4 were considered unsuitable and therefore the Applicant adjusted the search criteria to include more constrained areas of land. The Applicant did not redraw and reassess the original 4 PDAs on the basis that those areas of land had already been assessed and discounted. Instead, the Applicant focussed its assessment on considering new areas of land at Stages 5-6 of the assessment. All PDAs, regardless of the stage at which they were identified, were RAG rated against the same standardised assessment criteria, as set out in **Annexes A and D of ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185].** A check and balance exercise was also completed over the whole area to

ExQ	Respondent	Question	Applicant's Response
			consider any further land that had not been captured by a PDA. However, it is acknowledged that there are further parcels of land that could have been added to PDAs 1-4. This has been considered further in the **Technical Note on Site Selection Assessment [REP2-043].** The outcome of the further work was the identification of an additional area of land to the south of PDA 2, which could have been added to PDA2. However, PDA 2 is still considered unsuitable for development due to site size (even with the new land included). Whilst PDA 2 could be added to other PDAs to form a "cluster" (see further details in **[REP2-043]**, it is considered that its inclusion would not make any difference to the overall conclusions already formed, which that is none of the identified clusters are suitable alternatives for the Scheme. On this basis, the conclusions of **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]** remain unchanged. Given this and the submission of the **Technical Note on Site Selection Assessment [REP2-043]** at

ExQ	Respondent	Question	Applicant's Response
			Deadline 2, the Applicant does not intend to update **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185],** the **Planning Statement [REP2-017]** or the **ES** in relation to site selection.
ALT1.2	The Applicant	**Site Selection – Order Limits** In considering the selection of the specific Order limits at Lime Down, it has not been explained how this land was determined – other than a potential landowner willingness. For example, areas of Grade 3a land and land within flood zones 2 and 3 have been included but it is not clear if this is necessary considering the potential land available adjacent to the Order limits. You are asked to explain why areas identified as constraints are included within the Order limits and provide a justification. Could land elsewhere in the immediate vicinity of the Order limits have been used to avoid BMV, areas of flood risk and ecologically sensitive habitats?	<u>The Solar PV Sites</u> The land within the Solar PV Sites was initially determined through a combination of early environmental constraints mapping (to avoid constrained areas where possible) and discussions with landowners regarding the availability and suitability of land within the area. As set out in further detail in the **Design Approach Document [APP-268]**, the Solar PV Sites have evolved since initial site selection as a result of further environmental assessment, landowner discussions and consultation feedback, which has allowed the Applicant to avoid areas of constrained land and minimise the effects of the Scheme where possible. This includes: a. an additional 44 ha of land added to Lime Down C following non-statutory

ExQ	Respondent	Question	Applicant's Response
			consultation, which has allowed for a greater setback of panel infrastructure from the boundary of the Cotswolds National Landscape; b. reduction in Order Limits in Lime Down B around the Fosse Way (and removal of solar panels from that area) in order to limit effects on the Fosse Way; c. reduction in the Order Limits in Lime Down C to protect the Cotswolds National Landscape and its setting and heritage assets; d. reduction in the Order Limits in Lime Down E due to landscape and visibility constraints and field work showing areas were not suitable for ecological mitigation; and e. removal of planned solar panels in areas across the Solar PV Sites (with land maintained within the Order Limits) in order to reduce effects on receptors and provide opportunities for ecological mitigation and enhancements. With specific regard to the BMV land within the Solar PV Sites:

ExQ	Respondent	Question	Applicant's Response
			ES Volume 2, Figure 8-4: Agricultural Land Classification [APP-093] shows the Provisional 1970s ALC for the Solar PV Sites, which was used in the early stages of site selection to determine land for inclusion within the Scheme. This does not distinguish between Grade 3a and 3b land across the Solar PV Sites (for instance, Lime Down D is entirely shown as Grade 3 and 4 land). Detailed ALC surveys have since been carried out, as shown on **ES Volume 2, Figure 17-2: Agricultural Land Classification Mapping [APP-172]**. The Applicant has not carried out detailed ALC surveys for land outside the Order Limits and therefore cannot conclusively determine which areas of land would be less constrained by BMV than the area within the Order Limits. The detailed ALC surveys subsequently carried out for the Solar PV Sites (**ES Volume 2, Figure 17-2: Agricultural Land Classification Mapping [APP-172]**) show that many areas of the Grade 3a land identified in detailed mapping is intermingled with lower grade agricultural land (Grade 3b and 4),

ExQ	Respondent	Question	Applicant's Response
			particularly in Lime Down A, C and E. In several instances, there is a combination of different ALC grades within one field. Its removal from the Order Limits would therefore not be practicable and would adversely affect the Scheme's overall viability. With regard to areas of Grade 2 and 3a land within Lime Down D and Grade 3a land within Lime Down B, its inclusion has been informed by landowner discussions, including their preferences and knowledge of the agricultural, economic and environmental benefits of the land. The majority of landowners for these areas have confirmed a preference to include the land on the basis that it is some of the less productive land that they farm, regardless of ALC grade. Generally, the inclusion of the BMV land within the Order Limits is considered to be justified and necessary, with full reasons set out in Section 8 of the **Planning Statement [REP02-017]** (see paragraph 8.3.244 onwards). Its inclusion (including the Grade 2 land in Lime Down E) is seen as particularly necessary in light of other removals from the Order Limits

ExQ	Respondent	Question	Applicant's Response
			(as outlined above) in order to minimise effects on other receptors, including the Cotswolds National Landscape. Reduction in the Order Limits for other reasons (such as those mentioned above in relation to design evolution), have resulted in an overall reduction in the amount of BMV land within the Solar PV Sites. With regard to the areas of Flood Zones 2 and 3 within the Solar PV Sites: a. The majority of the areas of Flood Zones 2 and 3 (particularly the largest area in Lime Down D) are located on lower grade agricultural land (Grades 4 and subgrade 3b) and therefore its inclusion within the Solar PV Sites has allowed the Applicant to utilise lower grade agricultural land that has been made available by landowners. b. Whilst there are areas of Flood Zones 2 and 3 (particularly in Lime Down D and E), infrastructure has been placed sequentially to minimise flood risk, with areas covered by Flood Zones 2 and 3 being used for solar PV panels and biodiversity

ExQ	Respondent	Question	Applicant's Response
			enhancement areas on the basis that these are less vulnerable to flooding. Further details are provided in the Sequential and Exception Test at Annex C to the **Planning Statement [REP2-017]**. c. The Flood Risk Assessment (FRA) and Drainage Strategy is included at **ES Volume 3, Appendices 11-1 to 11-9 [REP1-037 to REP1-054]**. It concludes that flood risk from all sources to the Scheme is negligible to low and embedded mitigation has been incorporated into the Scheme design to increase its flood resilience, such as siting critical infrastructure in Flood Zone 1 and incorporating a minimum 8m buffer between infrastructure and all Main Rivers and Ordinary Watercourses. Further the Scheme is not anticipated to increase flooding elsewhere. Full details of the embedded mitigation are contained within **ES Volume 3, Appendices 11-1 to 11-9 [REP1-037 to REP1-054]**. With regard to ecologically sensitive habitats within the Solar PV Sites:

ExQ	Respondent	Question	Applicant's Response
			a. There are no designated sites within the Solar PV Sites and the Applicant took active steps to avoid such areas (such as adjacent Local Wildlife Sites) in its early site selection for the Solar PV Sites. With regard to ecologically sensitive habitats more generally, there are woodlands and watercourses, which will be retained and protected. Further details are provided in **ES Chapter 9: Ecology [REP01-015]**. Further, whilst the Solar PV Sites do contain areas of constrained land, a comparative assessment of the Solar PV Sites against alternative PDAs has been carried out using standardised assessment criteria, as set out in **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]** and **Technical Note on Site Selection Assessment [REP2-043]** and of the PDAs assessed, the Solar PV Sites are considered to outperform the alternatives, based on the criteria identified. In order to fully address question ALT1.2, the Applicant has also generally reconsidered the

ExQ	Respondent	Question	Applicant's Response
			area around the Solar PV Sites to determine if there are any obviously less constrained areas of land that could have been added to the Scheme in order to avoid the use of areas constrained by Flood Zones 2 and 3 and BMV. Constraints affecting land parcels around the Solar PV Sites are shown on Figure ALT1.2: Constraints on land around the Solar PV Sites accompanying this Response to Written Questions, with markers indicating the general areas considered. The Applicant's conclusions are listed below: The area between Norton and Malmesbury, known as King's Heath, is constrained by multiple public rights of way, pockets of Ancient Woodland, parcels of Grade 2 agricultural land and areas at high risk of surface water flooding. This includes a particularly high concentration of public rights of way when compared to the Solar PV Sites. Further, the proximity of the CNL to the north of King's Heath means that the inclusion of this area within the Scheme would still bring the Scheme close to the CNL. Therefore, a similar assessment would need to be carried out

ExQ	Respondent	Question	Applicant's Response
			around impacts on the CNL and the same policy tests would need to be applied regarding the CNL and its protection, enhancement and measures to seek to further its purposes, as have been applied for the Scheme. Areas to the north of Lime Down C and east of Lime Down A are in close proximity to the Cotswolds National Landscape The area to the east of Lime Down E is constrained by a comparatively high number of public rights of way (compared to the Solar PV Sites), together with broader areas of Flood Zones 2 and 3 and areas of Grades 1 and 2 agricultural land further to the east. The area south of Lime Down C and north of the M4 was explored for inclusion within the Scheme for siting solar PV panels, however, initial discussions with landowners did not reveal an opportunity to accommodate the Scheme. Whilst some of the above constraints could potentially be overcome through design and mitigation, on an initial review, these areas do

ExQ	Respondent	Question	Applicant's Response
			not offer a less constrained opportunity than the chosen land parcels for the Scheme. The Cable Route Corridor Land within the Cable Route Corridor has been selected and refined as described in Section 4.6 of **ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056].** This involved an initial desktop study for Non-Statutory Consultation and Scoping which took into account key considerations (such as keeping the route as straight as possible, avoiding direct significant impacts to internationally and nationally designated sites and ancient woodland etc) through to the final refinement for DCO Application which involved more detailed consideration of constraints to seek to minimise effects in line with the mitigation hierarchy.
ALT1.3	The Applicant	**Alternative Battery Technology** It is not clear that the applicant has considered alternative battery technology. You are asked to explain why alternative battery technology has not been considered, including those developed and manufactured in the United	**Section 5.11** of the **Statement of Need [REP1-085]** discusses different forms of energy storage in relation to their operational characteristics, (see for example Paragraphs 5.11.10 to 5.11.20). Government's Clean Power capacity ranges are included at **Table 1**

ExQ	Respondent	Question	Applicant's Response
		Kingdom (UK)/European Union (EU) which would have potential benefits such as lowering carbon emissions through transport.	of the **Statement of Need [REP1-085]**. These specifically include a capacity range for batteries, illustrating that there is a need for batteries specifically in the UK's future energy system. The characteristics of the BESS technology which has been assessed as part of the application have been set to ensure that flexibility in sourcing and final design may be retained until the point of detailed design. This protects the Scheme against supply risks or changing specifications and ensures that, within the parameters established by the DCO, the Applicant is able to take advantage of new and developing technology to enhance further the benefits arising from the Scheme while ensuring that a worst-case harm has been assessed. For this reason, paragraph 7.10.30 of **ES Chapter 7 Climate Change [APP-059]** describes that "the precautionary assumption that all products would come from China" has been made for this purpose. The Applicant will, at the detailed design stage, approach appropriate global and local supply chains to specify materials and technology to be used in

ExQ	Respondent	Question	Applicant's Response
			the Scheme. For the avoidance of doubt, this assessment does not commit the Applicant from sourcing BESS (and other materials and technology) from outside of the UK or EU. The **Outline BSMP [REP1-110]** explains in Section 2.2 that a concept design has been considered that uses a BESS system based upon lithium-ion phosphate (LFP) lithium-ion battery technology, which is considered a reasonable worst case in terms of safety. It then goes on to say that the final BESS design and chemistry type is still to be determined, which leaves flexibility for other types of battery to be used so long as the final design meets the **Design Principles and Parameters [REP1A-008]** and will be described in the detailed Battery Safety Management Plan which must be substantially in accordance with the **Outline BSMP [REP1-110].** Further explanation of alternative battery types can be found in the answer to question AQ1.1 part 4).
ALT1.4	The Applicant	**Panel Array Efficiency**	1. The light-induced degradation of solar panels is well understood and is anticipated for

ExQ	Respondent	Question	Applicant's Response
		Paragraph 2.10.55 of NPS EN-3 states '*The installed generating capacity of a solar farm will decline over time in correlation with the reduction in panel array efficiency. There is a range of sources of degradation that developers need to consider when deciding on a solar panel technology to be used. Applicants may account for this by overplanting solar panel arrays*.' You are asked: How has the reduction in panel array efficiency been considered in the decision of the solar technology to be used? 2) Was overplanting a consideration in relation to alternative site layouts and technologies? If so, provide further details.	all solar schemes. **Paragraph 7.10.73** of **ES Chapter 7 Climate Change [APP-059]** describes the Applicant's approach to accounting for product degradation in the assessment of the energy generation benefits of the Scheme. This is an industry-standard assumption and is appropriate for all solar panels and all mounting orientations. The Applicant has not yet specified the panels to be installed at the Scheme but has established control parameters around their relevant characteristics. At the detailed design stage, panel models will be specified. Among other factors, the availability of panels, their physical dimensions, power ratings and anticipated degradation performance will be assessed such that the Applicant is able to bring forward a scheme which delivers the greatest climate change, energy security and affordability benefits which can be achieved within the parameters secured at consent. 2.**Section 6.6** of the **Statement of Need [REP1-085]** explains that *"Schemes which are overplanted generate more low carbon electricity than unitary schemes for the same*

ExQ	Respondent	Question	Applicant's Response
			grid connection capacity but will generally require panels to be installed on a greater land area. Therefore, overplanting strategies are primarily dependent on the availability of sufficient suitable land for installing solar panels." During the consultation process the Applicant responded to feedback and reduced the land area upon which solar panels were proposed to be installed. This limits the overplanting achievable at the Scheme. However, because *"Overplanting is commercially rational on all types of schemes subject to the availability and suitability of a sufficient area of land for overplanting."* the Applicant aims to make the greatest possible use of the land and grid connection capacity available to it, including overplanting if possible. Because the Scheme is limited by the land available to it (while avoiding unacceptable levels of harm) no alternative sites or alternative solar technologies were deemed likely to deliver greater overplanting than the Scheme which has been brought forward.

2.3 Compulsory Acquisition, Temporary Possession and Other Land or Rights Considerations

ExQ	Respondent	Question	Applicant's Response
CA1.1	The Applicant	Extent of Order Limits Confirm that all the land within the Order limits is needed for the construction, operation or maintenance of the proposed development and that the Order land only relates to the land or interests required to be compulsorily acquired or temporarily possessed to implement the development. The ExA seeks to be assured that the Order limits are tightly drawn and do not include more land than is necessary for the development, or if such land is identified that is not required, the applicant should seek to remove it from the Order limits.	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. The **Design Approach Document [APP-268]** details the evolution of the Scheme's design and therefore how the Order limits have changed during the pre-submission process to encompass only land that is required for the Scheme. There will be some areas of the Order land, for example within the cable route corridors, where the entirety of the land is unlikely to be used but until detailed design is completed post-decision it cannot be removed from the Order land as some flexibility for micro siting is required. Further details are set out in Section 3.4 of the **Statement of Reasons [APP-018]**.

ExQ	Respondent	Question	Applicant's Response
CA1.2	The Applicant	Funding Statement Q1 The funding statement [APP-019] estimates that the cost for the proposed development is approximately £900-950 million, yet it provides no breakdown of costs for the various components, no information on what has informed that estimate, when that estimate was made, and whether and to what extent inflation and other project contingencies have been factored in. The applicant is required to explain further: The nature of the expert advice taken in that respect. The basis for and reliability of that estimate. When that estimate was made (cost base). What inflation assumptions have been made (noting construction price inflation is higher than general inflation). Please also confirm that the costs estimate covers all aspects of the project, including preparation costs, construction costs, supervision costs, equipment purchase,	The costs referred to in the **Funding Statement [APP-019]** were estimated by making separate estimates for the solar, BESS and grid connection (including substations) elements of the Scheme. Additionally estimated costs were further evaluated for land and consenting, and balance of plant (civil engineering) costs, with contingency on top. The majority of costs were estimated using Applicant market knowledge of average construction costs within the solar industry. Land and consenting costs were calculated by a Chartered Surveyor in the form of a Property Cost Estimate. 2) The cost estimate included in the **Funding Statement [APP-019]** has necessarily been made at an early stage in the process, before detailed design, tendering for services or procurement of infrastructure. As such the final amounts could vary from this, but with the contingency amounts included, is not expected to differ materially.

ExQ	Respondent	Question	Applicant's Response
		installation, commissioning, decommissioning, restoration of land, Value Added Tax (VAT), and land acquisition costs (including potential compensation and blight claims), whilst also specifically identifying the amount that has been ringfenced for land acquisition related costs.	3) The estimates were made in advance of submission of the DCO application in September 2025. 4) Contingency amounts were added to account for inflation and hence a range has been specified for the total estimated cost. The costs estimate does cover all costs associated with the construction of the Scheme including potential compensation for land acquisition. A breakdown of the land acquisition costs is provided below: **Estimate of costs for acquiring land and rights (including VAT and 10% contingency)** £42,674,738

ExQ	Respondent	Question	Applicant's Response
			Estimate of other compensation costs such as survey access and temporary possession (including VAT and 10% contingency) £6,268,547 **Total land acquisition costs including VAT and 10% contingency** £48,943,285
CA1.3	The Applicant	Funding Statement Q2	The funding and delivery of the Scheme will be financed through private investment, as is

ExQ	Respondent	Question	Applicant's Response
		The funding statement [APP-019] notes the applicant's ability to procure the necessary financial resources through its parent company Island Green Power to fund the works. Regulation 3(2) of the Infrastructure Planning (Miscellaneous Prescribed Provisions) Regulations 2010 allows for five years within which any notice to treat must be served, beginning on the date on which the order granting development consent is made. The ExA needs to be satisfied that adequate funding is likely to be available to enable the compulsory acquisition (CA) within the statutory period following the order being made, and that the resource implications of a possible acquisition resulting from a blight notice have been taken account of. The applicant is asked to provide the latest audited accounts or financial statements from the parent company to show that they can fund the scheme and all potential CA costs including potential compensation and/ or blight claims. If not, explain why not and how the ExA can be assured that sufficient funding would be available.	common for all large-scale energy projects in Great Britain. This model enables the development of essential low-carbon infrastructure without reliance on public funds. The Applicant is ultimately owned by three investment funds, which are managed by Macquarie Asset Management on behalf of a range of investors, including a number of UK pension funds. These investors would receive returns through the funds, while Macquarie would receive management fees, as is standard. Further funding may come from commercial lenders, who would receive interest payments. The funding structure is common in the energy sector and ensures that the Scheme is financially robust and deliverable. The Applicant notes that Article 48 of the **draft DCO [REP1-007]** requires a parent company guarantee or other form of security to be approved by the Secretary of State prior to exercising the compulsory acquisition and temporary use powers. This provision ensures that any compensation liability arising from the use of such powers will be paid.

ExQ	Respondent	Question	Applicant's Response
			In terms of decommissioning, a requirement to decommission the Scheme is set out in Requirement 20 of the **draft DCO [REP1-007]**; failing to comply with that requirement would be a criminal offence. The requirement to decommission the Scheme would sit with the undertaker at the time of decommissioning. Decommissioning is also covered in the agreements with landowners, which include decommissioning securities to cover the cost of decommissioning in the event of any breach by the Applicant or in the event of the insolvency of the Applicant. The amount of such decommissioning security will be regularly re-valued throughout the lifecycle of the Scheme and topped up if necessary. The Applicant has also submitted an **Outline Decommissioning Strategy [REP1-100]**, and a final Decommissioning Strategy will be prepared and agreed with the relevant planning authority at that time of decommissioning and will include detailed measures and timescales (in accordance with Requirement 20 of the **draft DCO [REP1-007]**).

ExQ	Respondent	Question	Applicant's Response
CA1.4	The Applicant	Reasonable Alternatives to Compulsory Acquisition Paragraph 25 of the Department of Communities and Local Government Compulsory Acquisition Guidance[1], states that applicants should seek to acquire land by negotiation wherever practicable. As a general rule, authority to acquire land compulsorily should only be sought as part of an order granting development consent if attempts to acquire by agreement fail. How can the ExA be assured that all reasonable alternatives to CA (including modifications to the scheme) have been explored? Set out in summary form, with document references where appropriate, what assessment/comparison has been made of the alternatives to the proposed acquisition of land or interests in each case.	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 DCO [REP1-007]**. The **Land and Rights Negotiations Tracker [REP2-006]** sets out the status of negotiations with landowners at Deadline 2. An updated Land and Rights Negotiations Tracker will also be submitted at Deadline 3. The **Environmental Statement (ES) Volume 1, Chapter 4 Alternatives and Design Evolution [APP-056]**, **ES Volume 3**, **Appendix 4-1 Site Selection Assessment Report [APP-185]** and the **Technical Note on Site Selection Assessment [REP2-043]** set out the Applicant's approach to site selection and the consideration of alternatives. The Order limits, and the powers of compulsory acquisition included within the **draft DCO [REP1-007]**, represent the minimum amount of land necessary to deliver the Scheme, having

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

ExQ	Respondent	Question	Applicant's Response
		Has the applicant offered full access to alternative dispute resolution techniques for those with concerns about the CA of their land or considered other means of involving those affected?	considered reasonable alternatives in terms of location and technology. The Applicant has also considered how the Scheme will be constructed and operated and has included the minimum land powers necessary to ensure that it is able to construct, operate, maintain and decommission the Scheme. The extent of the land powers being sought in the **draft DCO [REP1-007]** are shown on the **Land Plan [REP1-004]**. Wherever practicable, compulsory acquisition of rights has been preferred to compulsory acquisition of the freehold. Similarly, where temporary possession powers are sufficient, these have been sought instead of compulsory acquisition where practicable. The Applicant will only exercise compulsory acquisition powers over the minimum amount of land necessary. 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

ExQ	Respondent	Question	Applicant's Response
			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. As set out in section 7 of the **Statement of Reasons [REP1-085]**, 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 DCO [REP1-007]**, and that there is a compelling case in the public interest for these compulsory acquisition powers to be granted. The Applicant has committed to meeting reasonable and demonstrable costs for agent's and legal fees for landowners in relation to the negotiation and execution of Heads of Terms. 80% of landowners in the Land Rights and Negotiations Tracker have agents acting for them. Where a party has not appointed an agent, mediation will be offered as a form of alternative dispute resolution.
CA1.5	The Applicant	Scope and Purpose of Rights and Powers sought Q1	The broad scope of the power in Article 20 (Authority to survey and investigate the land) of the **draft DCO [REP1-007]** is required as

ExQ	Respondent	Question	Applicant's Response
		Paragraph 5.6.2 of the Statement of Reasons (SoR) [APP-018] states that Article 20 of the draft Development Consent Order (dDCO) (authority to survey and investigate land) would give the applicant power to enter 'certain land' for the purpose of surveying and testing, yet the article appears to enable the applicant (or any subsequent undertaker) to enter onto any land within or outwith the Order limits. This is quite a broad power, which is seemingly not justified in the SoR, nor the Explanatory Memorandum (EM) [REP1-009]. While the ExA note that this provision has been included in other made DCOs, why is this broad power specifically required here? In addition, 14 days' notice to landowners who are not regarded as Affected Persons for the purpose of this application does not seem like a reasonable period of time. Provide justification for this short notice period and consider whether this should be extended to 28 days.	surveys may be needed outside of the Order limits to monitor noise, ecological receptors (such as the presence of protected species) and ensure safe construction practices. For example, to it may be necessary to monitor noise levels at sensitive receptors to demonstrate that noise mitigation measures are effective or in the event of any complaints. The Applicant notes that the scope of the power in Article 20 is similar to the survey powers contained in section 172 of the Housing and Planning Act 2017, section 53 of the Planning Act 2008 (as it will be amended by the Planning and Infrastructure Act 2025) and paragraph 10 of Schedule 4 to the Electricity Act 1989 (Ref 4; Ref 5; Ref 6). Each of these powers is also available to the Applicant as a statutory undertaker. In respect of the 14-day notice period, this is consistent with the notice period in the Housing and Planning Act 2017, the Planning Act 2008 and the Electricity Act 1989. There are also a number of made DCOs where 14 days' notice was considered appropriate by the

ExQ	Respondent	Question	Applicant's Response
			Secretary of State, these being The Fenwick Solar Farm Order 2026, The East Yorkshire Solar Farm Order 2025, The Tillbridge Solar Order 2025, The West Burton Solar Project Order 2025 and The Cottam Solar Project Order 2024. The Applicant notes that this is the minimum amount of notice required and typically the Applicant will give more notice. Compensation is payable for any damage caused. A 14-day notice period is therefore considered to be appropriate for the Scheme.
CA1.6	The Applicant	Scope and Purpose of Rights and Powers sought Q2 Article 20(1) of the draft Development Consent Order (dDCO) [REP1-007] gives the applicant the authority to survey and investigate land including '*archaeological investigations on such land, including the digging of trenches*'. While the power for the Secretary of State (SoS) to designate, and the requirement to have regard to the Infrastructure Planning (Model Provisions) (England and Wales) Order 2009, have both been removed by the Localism Act 2011, the applicant's EM [REP1-	(1) As anticipated by Article 20(1)(c), the digging of trenches is required for the purposes of determining ground conditions and archaeological investigations. Trenching is a well-established and commonly required method of ground investigation for infrastructure projects of this scale and type. Typically, these surveys will be required to inform the detailed design post consent and prior to finalisation of the management plans. The Applicant notes that the Model Provisions included references to making "trial holes" and "archaeological investigations" and therefore does not agree that the inclusion of "digging

ExQ	Respondent	Question	Applicant's Response
		009] states that it is still relevant to note and explain variations made in the dDCO compared to the model provisions. However, the digging of trenches goes beyond the model provisions but this has not been justified. The applicant is asked to provide justification for requiring 'the digging of trenches'? Explain what control measures would be in place? Explain whether reinstatement of the land to its previous condition and state is secured, and if so, how is it secured? Clarify whether a time limit applies to 'leaving apparatus on the land' (Article 20(1)(d))?	trenches" in Article 20 goes beyond the types of surveys envisaged by the Model Provisions. The inclusion of 'the digging of trenches' in Article 20 has precedent in The Fenwick Solar Farm Order 2026, The Tillbridge Solar Order 2025, The East Yorkshire Solar Farm Order 2025, The West Burton Solar Project Order 2025 and The Cottam Solar Project Order 2024. Article 20 is consistent with the statutory powers of access under section 172 of the Housing and Planning Act 2016, section 53 of the Planning Act 2008 (as amended by the Planning and Infrastructure Act 2025) and paragraph 10 of Schedule 4 to the Electricity Act 1989 which all refer to boring or excavating land. Each of these powers is also available to the Applicant as a statutory undertaker. (2) Any archaeological trial trenching would be undertaken in accordance with the **Outline Archaeological Mitigation Strategy [APP-230]** pursuant to Requirement 12. Any other intrusive surveys would be undertaken in accordance with the Permitted Preliminary

ExQ	Respondent	Question	Applicant's Response
			Works Environmental Management Plan which will be submitted at Deadline 4. (3) The method and timing of the reinstatement of any trenches will depend on whether the land is subsequently required for the Scheme. Further details will be set out in the Permitted Preliminary Works Environmental Management Plan which will be submitted at Deadline 4. Article 20(5) provides that compensation will be payable to any landowners / occupies suffering loss or damage arising by reason of the exercise of authority conferred by Article 20. Additionally, as per Article 20(4), the making of trial holes, boreholes or trenches is not permitted in land located within the highway boundary or in a private street within the consent of the highway authority or the street authority respectively. (4) In respect of a time limitation, the **draft DCO [REP1-007]** does not include a specific period for which apparatus may be left on land as this will depend on the type of survey or investigation for which it is placed, such that it

ExQ	Respondent	Question	Applicant's Response
			would be removed once that purpose has been completed. As noted, compensation would be paid for any loss or damage caused.
CA1.7	The Applicant	Scope and Purpose of Rights and Powers sought Q3 Articles 20(6), 31(12) and 32(10) of the dDCO [REP1-007] include reference to Section 13 of the Compulsory Purchase Act 1965, which provides an enforcement mechanism (by way of a warrant) where entry onto land is refused. Paragraphs 4.4.8 and 4.5.23 of the EM [REP1-009] states in relation to Articles 20(6) and 31(12), that this is considered necessary so that there is no delay in the implementation of the authorised development, and has precedent in recent solar decisions. Section 13 of the Compulsory Purchase Act 1965 reads as follows: *'(1) If the acquiring authority are under this Act authorised to enter on and take possession of any land, and the owner or occupier of any of that land, or any other person, refuses to give up possession of it, or hinders the acquiring authority from entering or taking*	The reference to section 13 of the Compulsory Purchase Act 1965 (Ref 7) within Article 20 (Authority to survey and investigate the land), Article 31 (Temporary use of land for constructing the authorised development) and Article 32 (Temporary use of land for maintaining the authorised development) of the **draft DCO [REP1-007]** is included as a backstop position required in the event that a landowner refuses access to their land for the purposes prescribed by each Article. In the absence of the reference to section 13, the undertaker would not be able to compel access, and the relevant powers could be rendered ineffective by a landowner, therefore impeding the delivery of the Scheme. In respect of Article 20(6) surveys may be needed in relation to land which may be affected by the authorised development, which may include land outwith the Order limits for

ExQ	Respondent	Question	Applicant's Response
		possession of it, the acquiring authority may issue their warrant to *(a) the sheriff, or* *(b) the enforcement officer,* *to deliver possession of it to the person appointed in the warrant to receive it.* *(2) On receipt of the warrant [the person to whom it is issued] shall deliver possession of any such land accordingly.* *(3) The costs accruing by reason of the issue and execution of the warrant, to be settled by [the person executing the warrant], shall be paid by the person refusing to give possession, and the amount of those costs shall be deducted and retained by the acquiring authority from the compensation, if any, payable by them to that person.'* The ExA note that this power is normally exercised by local authorities or statutory undertakers. Therefore, the power to issue a warrant directly to an enforcement officer and then charge the recipient for this, should be justified in more detail, particularly where in the	the reasons set out in the Applicant's response to ExQ CA1.5. It is noted that the Applicant is a statutory undertaker as it has a generation licence pursuant to the Electricity Act 1989 (Ref 6). It is also noted that powers to obtain a warrant are included in the statutory powers of access contained in section 172 of the Housing and Planning Act 2016 (which is also available to the Applicant, Ref 4). The Applicant considers that the ability to obtain a warrant is therefore necessary and appropriate to enable any required surveys to be undertaken.

ExQ	Respondent	Question	Applicant's Response
		case of Article 20 it might apply to land outwith the Order limits.	
CA1.8	The Applicant	Scope and Purpose of Rights and Powers sought Q4 Section 5 of the SoR [APP-018] considers the source and scope of the powers set out in the dDCO [REP1-007]. It is stated that land within the Order limits would be subject to a statutory authority to override easements and other rights, and to extinguish private rights upon the appropriation of the land for the purposes of the DCO. This was briefly discussed at Issue Specific Hearing 1, particularly in relation to Article 25 of the dDCO, and the applicant explained that interference would occur only where a private right is incompatible with delivery of the authorised development, in which case compensation would be payable to any person who suffers loss as a result. The applicant added that it is not seeking to extinguish or remove private rights as a matter of course and would not seek to interfere with any right that can coexist with the development.	(1) The inclusion of sub-paragraph (4) reflects that there may be circumstances where the permanent acquisition or extinguishment of a private right or restrictive covenant is necessary. This approach is less onerous than the provisions contained in the Model Provisions and solar DCOs made to date which automatically extinguished all private rights where land was acquired unless notice to the contrary was given. (2) Unlike sub-clauses (1) to (3), which operate automatically, sub-clause (4) is a notice-based mechanism which requires the Applicant to make deliberate action to extinguish a particular private right or restrictive covenant - it does not operate automatically. The Applicant must serve a notice on the holder of the right in question, specifying the date from which extinguishment takes effect. That date is either the date of acquisition of the land, the right, or the benefit of the restrictive covenant (whether compulsorily or by agreement), or the date of entry on the land under section 11(1) of

ExQ	Respondent	Question	Applicant's Response
		The ExA note that Article 25 was amended at deadline 1 (D1) to include sub-clause 4, as follows: *'(4) The undertaker may by notice extinguish private rights and restrictive covenants over land subject to compulsory acquisition under this Order—* *(a) from the date of acquisition of the land, or of the right, or of the benefit of the restrictive covenant by the undertaker, whether compulsorily or by agreement; or* *(b) on the date of entry on the land by the undertaker under section 11(1) (power of entry) of the 1965 Act.'* A justification for this inclusion has not been provided in the EM [REP1-009] and the power seems broader than those sought in Article 25, sub-clauses (1) to (3), which are qualified by whether the private rights or restrictive covenants are inconsistent with powers authorised by other DCO articles. The applicant should explain: what sub-clause (4) seeks to achieve; and	the Compulsory Purchase Act 1965 (Ref 7). By specifying the date from which extinguishment takes effect, sub-clause (4) provides certainty for both the Applicant and the holder of the right, and in particular clarity as to when the holder of the extinguished right becomes entitled to claim compensation under Article 25(5), which provides that any person who suffers loss by the extinguishment of a private right or restrictive covenant under the article is entitled to compensation accordingly.

ExQ	Respondent	Question	Applicant's Response
		how it differs from the powers contained in sub clauses (1) to (3), and thus why it is needed.	
CA1.9	The Applicant	Scope and Purpose of Rights and Powers sought Q5 Article 29 in the dDCO [REP1-007] relates to acquisition of subsoil only. What are the conditions/ criteria for identifying acquisition of sub soil only? Should this power be restricted to specific land and identified in a schedule? Is any compensation available to an affected landowner? If not, why not?	(1) Article 29(1) permits the undertaker to acquire compulsorily so much of, or such rights in, the subsoil of the Order land as may be required for any purpose for which that land or rights in that land may otherwise be acquired, instead of acquiring the whole of the land. It is supplementary, and not a separate power of acquisition. The criteria for its exercise are that: (i) the subsoil forms part of the Order land; (ii) the acquisition is required for a purpose for which that land could be acquired under the **draft DCO [REP1-007]** and (iii) acquisition of the subsoil only is sufficient to meet the undertaker's operational requirements, rendering full freehold acquisition unnecessary and disproportionate. In practice, Article 29 would principally be exercised in relation to land within which underground cables and associated ducting are to be installed but no above ground access is required. For example, where the cable installation will be undertaken using HDD.

ExQ	Respondent	Question	Applicant's Response
			(2) With regard to whether a separate schedule is required, the Applicant does not consider this necessary. The areas over which Article 29 may be exercised are the same as those over which the broader acquisition powers under Articles 21 (Compulsory acquisition of land) and 24 (Compulsory acquisition of rights) may be exercised, as shown on the **Land Plan [REP1-004]**. A more precise identification is not possible at this stage because the exact location of underground cables where no above ground access is required cannot be confirmed until detailed design is complete. The appropriate approach, consistent with that adopted in previously made solar DCOs, is to identify the maximum extent of land on the **Land Plan [REP1-004]** and then exercise acquisition powers proportionately once detailed design has been finalised. (3) Compensation is payable in accordance with the general compulsory purchase compensation code. However, Article 29(3) disapplies three specific landowner protections where the subsoil-only power is exercised: the

ExQ	Respondent	Question	Applicant's Response
			Schedule 2A counter-notice (notice to treat route), the Schedule A1 counter-notice (general vesting declaration route), and section 153(4A)(a) of the Town and Country Planning Act 1990 (blight notices, Ref 8). These disapplications reflect the lesser nature of the interest being acquired. By way of Article 29(4), these disapplications do not apply where the undertaker acquires a cellar, vault, arch, or other construction forming part of a house, building, or factory, preserving the full range of protections for owners and occupiers of such structures in the unlikely event that this applied to the Scheme.
CA1.10	The Applicant	Scope and Purpose of Rights and Powers sought Q6 Provide detail of what would happen to rights acquired if and when the project, or elements of the project, are decommissioned, and how is this captured in the dDCO?	Voluntary agreements with landowners is the preferred approach where possible. For the Solar PV Sites, under the terms of the voluntary agreements the land would be leased and the freehold would therefore remain with the landowner throughout the operation of the Scheme. At the end of the operational life of the Scheme, the solar panels, substations and BESS will be removed, the land will be restored, and the

ExQ	Respondent	Question	Applicant's Response
			lease will end, enabling the landowner to return the land to agricultural use. Compulsory acquisition powers are included as a backstop only, in the event that agreement cannot be reached or falls away. Where rights or interests in land are compulsorily acquired, those rights vest permanently in the undertaker and do not automatically revert upon decommissioning. The landowner will therefore have been compensated for the permanent acquisition of the land or rights. It is noted that it is not legally possible to acquire a lease or an easement for a term of years using compulsory acquisition powers. However, the undertaker would retain no operational need to exercise those rights following decommissioning, and the decommissioning framework controlled by Requirement 20 (Decommissioning and restoration) of Schedule 2 (Requirements) to the **draft DCO [REP1-007]** ensures that the land is restored to the satisfaction of Wiltshire Council as the relevant planning authority.

ExQ	Respondent	Question	Applicant's Response
			Following decommissioning, it may be possible to enter into a deed of release in respect of land subject to rights acquired by compulsory acquisition powers but this can only be achieved by agreement with the landowner. Rights of temporary possession under Articles 31 (Temporary use of land for constructing the authorised development) and 32 (Temporary use of land for maintaining the authorised development) are time-limited by the terms of the articles under which they are granted. Before giving up possession, the undertaker is in each case required to remove all temporary works and restore the land to the reasonable satisfaction of the owners.
CA1.11	The Applicant	Temporary Possession Q1 Given the parliamentary approval to the temporary possession (TP) regime under the Neighbourhood Planning Act 2017 ('NPA 2017'), which was subject to consultation and debate before being enacted (and which, by virtue of dDCO Article 6(1)(g), the applicant is seeking to disapply), should any provisions relating to notices/counter notices which do not	(1) In respect of the NPA 2017 (Ref 9), as noted, sections 18 – 31 which relate to the temporary possession of land are not yet in force with no date known as to when these will take effect. It is also not yet known how or if these provisions will apply to compulsory acquisition powers in DCOs (as opposed to CPOs). In the absence of any confirmed and operative statutory framework, it is not possible to determine with certainty what the incoming

ExQ	Respondent	Question	Applicant's Response
		reflect the NPA 2017 proposed regime (not yet in force) be modified to more closely reflect the incoming statutory regime where possible? As examples: The notice period that would be required under the NPA 2017 Act is 3 months, substantially longer than the 14 and 28 days required under dDCO Articles 31(3) and 32(3) respectively. Other than prior precedent, what is the justification for only requiring 14 days' and 28 days' notice in this case? Under the NPA 2017, the notice would also have to state the period for which the acquiring authority is to take possession. Should such a requirement be included in this case? If not, why not? Powers of TP are sometimes said to be justified because they are in the interests of landowners, whose land would not then need to be acquired permanently. The NPA 2017 Act provisions include the ability to serve a counter-notice objecting to the proposed TP so that the landowner would have the option to choose whether TP or permanent acquisition	regime will require for a project of this type. The Applicant therefore does not consider it appropriate to seek to replicate, or align with, provisions which are not yet in force. The temporary possession regime in Articles 31 (Temporary use of land for constructing the authorised development) and 32 (Temporary use of land for maintaining the authorised development) of the **draft DCO [REP1-007]**, including the notice provisions in Articles 31(3) and 32(3), is instead consistent with the approach taken in other recently consented solar Development Consent Orders. The Applicant also notes that the land included in the Scheme is predominantly agricultural land and the powers do not apply to any house or occupied building where a longer time period to vacate may be necessary. In relation to the notice provisions specifically, these are precedented in The Tillbridge Solar Order 2025, The East Yorkshire Solar Farm Order 2025, The West Burton Solar Project Order 2025 and The Cottam Solar Project Order 2024. In the event that an owner or occupier suffers loss as a result of the exercise

ExQ	Respondent	Question	Applicant's Response
		was desirable. Should this dDCO make some such provision – whether or not in the form in the NPA 2017?	of temporary possession powers - compensation is payable. (2) With regard to whether the notice of temporary possession should also state the period for which possession is to be taken, Articles 31(4) and 32(4) already contain limitations on timeframes for being in possession of the land. Requiring the notice itself to specify a precise period may not always be practicable given the nature of construction and maintenance activities. The Applicant does not consider the additional requirement necessary. (3) Finally, the Applicant does not consider it necessary or appropriate to include a counter notice provision within the **draft DCO [REP1-007]** as in a scenario where the temporary possession powers are being used the Applicant has specifically identified that it does not need all of the land permanently. It would not be appropriate to compel the Applicant to purchase large areas of agricultural land that it only requires during the construction period for the Scheme. It is noted that the landowner

ExQ	Respondent	Question	Applicant's Response
			would be compensated for any period of temporary possession.
CA1.12	The Applicant	Temporary Possession Q2 Article 31 of the dDCO [REP1-007] allows land specified in Schedule 11 to be temporarily used for the carrying out of the authorised development (under Article 31(1)(a)(i)). It also allows TP of any land in respect of which no notice of entry has been served under section 11 of the 1965 Act[2] (powers of entry) and no declaration has been made under section 4 of the 1981 Act[3] (execution of declaration) (under Article 31(1)(a)(ii)). Pursuant to Article 31(4) the undertaker must return land that it temporarily possesses, no later than one year beginning with the date of final commissioning (unless it has an alternative agreement with the landowner), or in the case of land referred to in Article 31(1)(a)(ii) it has served a notice of entry under section 11 of the 1965 Act or made a	Article 31 is intended to provide temporary possession powers during the construction period for the Scheme which may include permitted preliminary works. As the Applicant is required to compensate the landowner for any period of temporary possession it is not in the Applicant's interest to stay in possession of the land for any longer than is required. However, it is important that the temporary possession period is not curtailed such that it would prevent the Applicant from complying with all of its restoration obligations post construction. The Applicant therefore considers that a maximum time period of 1 year from the date of final commission of that part is necessary and appropriate.

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

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

ExQ	Respondent	Question	Applicant's Response
		declaration under section 4 of the 1981 Act in relation to that land. The ExA is concerned that there is potential for the land to be temporarily possessed for a considerable period of time, noting that many of the purposes for possession listed in Article 31(1)(b) to (f) cover both preliminary works[4] and construction. In addition, and as discussed at Issue Specific Hearing 1, works could commence but then be delayed due to many factors, such as supply chain issues, meaning that the date of final commissioning could be several years after the land was first possessed. Therefore, what more certainty could be drafted into Article 31 to prevent lengthy TP periods?	
CA1.13	The Applicant	Temporary Possession Q3 Article 31(1)(b)) of the dDCO [REP1-007] allows the applicant to remove any buildings, structures, agricultural plant and apparatus, electric lines, drainage, fences, debris and vegetation from that land without the	(1) The power contained within Article 31(1)(b) is required to ensure that there is no physical impediment to the construction of the Scheme. This includes any buildings or structures that may be erected by the landowner prior to the commencement of construction of the

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

ExQ	Respondent	Question	Applicant's Response
		requirement to reinstate them when possession of the land is given up (Article 31(5)(a)). The EM [REP1-009] has not provided justification for this power, other than to say that Article 31 has recent precedent in other made solar DCOs. Justification should be provided as to why the power is appropriate and proportionate having regard to the potential impacts on Affected Persons. Can the applicant clarify if it has already identified any buildings or drainage infrastructure which requires removal to facilitate construction on land which is subject to TP, and whether the respective Affected Persons have been made aware?	Scheme. The Applicant confirms that it is not aware of any buildings or structures that currently exist that will need removal as part of the scheme. It should be noted that this is qualified by Article 31(2) which prevents the undertaker from taking temporary possession of any house or garden belonging to a house or any occupied building. In respect of the removal of buildings, structures, agricultural plant and apparatus, electric lines, drainage, fences, debris and vegetation contemplated by Article 31(1(b), a reinstatement provision is not considered proportionate here as (i) structures may by their nature be incapable of reinstatement in their original form and (ii) the appropriate protection for affected persons in this regard is provided through the general restoration obligation under Article 31(5) and the compensation provisions under Article 31(6). For example, alternative drainage may have been put in place during construction and it may be preferable to retain that drainage rather than reinstate the original drainage. The Applicant therefore does not consider that

ExQ	Respondent	Question	Applicant's Response
			a blanket reinstatement obligation would be appropriate, as it would be impracticable in many cases and would risk impeding the construction of the authorised development. The drafting has precedent in The Fenwick Solar Farm Order 2026, The Tillbridge Solar Order 2025, The East Yorkshire Solar Farm Order 2025, The West Burton Solar Project Order 2025 and The Cottam Solar Project Order 2024.
CA1.14	The Applicant	Temporary Possession Q4 Article 32 of the dDCO [REP1-007] allows TP of land to be taken of the land at any time during the 'maintenance period', which is a 5 year period after the date of final commissioning, phased for each part of the development or another period to be specified in the landscape and ecological management plan. Provide justification for why all the Order land is covered by this article. Article 32(4) states the undertaker may only remain in possession of land under this article	(1) Article 32 applies to the whole of the Order limits and ensures that the Applicant can limit the exercise of compulsory acquisition powers to only what is required for the operation and maintenance of the authorised development for the duration of the operational period. The ability to take temporary possession of any Order land for post construction maintenance purposes, rather than acquiring permanent rights over that land, is of benefit to landowners, as it avoids the need for permanent acquisition of land that would otherwise be temporarily occupied for discrete and limited maintenance activities.

ExQ	Respondent	Question	Applicant's Response
		for as long as reasonably necessary. Who defines what is 'reasonably necessary'?	For example, this power may be used to ensure the establishment of reinstated hedgerows along the cable route corridor. The nature of the authorised development is such that a range of maintenance activities may be required across different parts of the Order land. The precise locations at which maintenance access will be required cannot always be determined in advance with certainty. It is therefore necessary for Article 32 to apply across the whole of the Order limits to ensure that the Applicant is not impeded in its ability to maintain the authorised development effectively and comply with the Requirements and associated management plans. This approach is consistent with other recently consented solar DCOs. (2) The use of 'reasonably necessary' within Article 32(4) is objective and intended to be determined by the particular maintenance activity being carried out. Compensation is payable for loss and damage caused by the exercise of temporary possession powers throughout the period of possession and any

ExQ	Respondent	Question	Applicant's Response
			disputes can be referred to the Upper Tribunal (Lands Chamber) pursuant to Article 32(7).
CA1.15	The Applicant	Effects upon Individual Affected Persons Section 7.4 of the SoR [APP-018] sets out the applicant's consideration of private loss as a result of CA powers, and states in paragraphs 7.4.6 and 7.4.7 that there is a compelling case in the public interest for the power to compulsorily acquire land and rights over land (together with the imposition of restrictions) and for the power to extinguish, suspend or interfere with private rights to the extent necessary to deliver the development. What assessment, if any, has been made of the effect upon individual Affected Persons (including agricultural lessees and tenants) and their private loss that would result from the exercise of CA powers in each case? Explain the level of engagement with individual Affected Persons and how (if at all) that engagement has helped to shape the proposals or enabled the applicant to make	The Applicant has sought to minimise all potential impacts on Individual Affected Persons. Where impacts are unavoidable, compensation would be payable to each landowner for any loss that would result from the exercise of CA powers. The Applicant has engaged with all Affected Persons and their agents, throughout the pre-application process and engagement is ongoing. Through this engagement the Applicant has sought to understand the impacts of the Scheme on landowners and the extent of any private loss (both temporarily and permanently). This engagement was taken into account when considering the type and extent of land and rights to be acquired for the Scheme. The Applicant would refer to both the **Land Rights and Negotiations Tracker and the Communication Log [EN010168/EXAM/9.31]** for details of engagement with each individual party.

ExQ	Respondent	Question	Applicant's Response
		changes to designs and layouts to minimise the private loss? How can the ExA be satisfied that any interference with individual private rights is proportionate and necessary?	As part of the preparation of the **Funding Statement [APP-019]**, the potential land acquisition and compensation costs were calculated by a Chartered Surveyor (see the response to question CA1.2 above). As part of this exercise, the private loss of each landowner and occupier was considered. The Applicant did not identify any losses that could not be compensated financially. The Applicant has sought to minimise the extent of the Order limits as far as is practicable at this stage in the process. The land included within the Order limits is the minimum necessary to deliver the Scheme whilst also retaining a proportionate amount of flexibility for detailed design. The Applicant refers to section 4.6 of **ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056]** which details the factors that were taken into account when refining the Cable Route Corridor.
CA1.16	The Applicant	Accuracy of the Book of Reference, Land Plans and Points of Clarification Q1	The Applicant can provide assurance that the land interests identified are accurate based on robust methods of diligent inquiry. This

ExQ	Respondent	Question	Applicant's Response
		What assurance and evidence can the applicant provide of the accuracy of the land interests identified as submitted? Also, the applicant should set out what further steps it will be taking to investigate any unknown ownership and rights during the Examination.	methodology is documented in 8.2 of the **Statement of Reasons [APP-4.1]** and has included: a. Desktop land referencing research b. Direct engagement with landowners via letters, calls, and meetings c. Site inspections and erection of site notices d. Additional notices at section 56 stage to identify unknown parties If required, supporting evidence, such as Land Interest Questionnaires, correspondence records, and site notice photography, can be provided. Further to the above, the Applicant has also applied the ad medium filum assumption over unregistered public highways where necessary and included such parties in the **Book of Reference [REP1-011]**. During Examination, the Applicant will continue to undertake diligent inquiry to identify unknown land interests through ongoing landowner engagement, and site investigations via noticing and visits.

ExQ	Respondent	Question	Applicant's Response
			The **Book of Reference [REP1-011]** will be updated to reflect any new or amended interests from this continued diligent inquiry.
CA1.17	Any Affected Person Interested Parties	Accuracy of the Book of Reference, Land Plans and Points of Clarification Q2 The Book of Reference (BoR) [REP1-011] identifies on a plot by plot basis, all parties who own or occupy land and/or have an interest in or right over the land affected by the proposal, and/or who may be entitled to make a 'relevant claim', as defined in section 57 of the Planning Act 2008. Are any Affected Persons or Interested Parties aware of any inaccuracies in the BoR, in the SoR [APP-018] or Land Plans [REP1-004]? If so, please set out what these are and provide the correct details.	Question not directed at the Applicant.
CA1.18	The Applicant	Land Rights Tracker The ExA note that Category 1 occupiers, lessees and tenants identified within the BoR [REP1-011] have not been included within the Land Rights Tracker [REP1-013 (PDF) and REP1-246 (spreadsheet)]. The introduction section of the Tracker states that the applicant is requesting such interests are signatories to	The Applicant notes the comments and the **Land and Rights Negotiations Tracker [EN010168/APP/4.4]** (Revision 5) has been updated to include the occupiers, lessees and tenants of the land plots. The Applicant has produced a 'contact log' which has been submitted at Deadline 3 **Land**

ExQ	Respondent	Question	Applicant's Response
		voluntary agreements being sought with Category 1 owners where required. The ExA is concerned about the lack of information on voluntary agreements with occupiers, lessees and tenants of land plots, as the Tracker seems only to report on the applicant's negotiations with the landowner(s). In addition, for some of the plots where the tracker identifies that an option agreement has been signed with the landowner (and shaded green in column N), agricultural lessees and tenants associated with those plots have submitted objections to the ExA about the project. The Land Rights Tracker should therefore be updated to include a Part 3 that identifies all Category 1 occupiers, lessees and tenants and plot numbers and the status of any voluntary agreements with those parties. The ExA requests that the applicant produces a 'contact log' as part of the status of negotiations column in the Land Rights Tracker to enable the ExA to understand the extent and remit for engagement with affected persons.	**and Rights Communications Log [EN010168/EXAM/9.31]**. The Applicant has updated the **Land Rights Negotiations Tracker [EN010168/APP/4.4]** (Revision 5) to include Part 4 as the 'Overview Table'.

<table>
<tr><th>ExQ</th><th>Respondent</th><th>Question</th><th>Applicant's Response</th></tr>
<tr><td></td><td></td><td>The latter could be provided in a separate status of negotiations schedule if preferred. A useful example can be found in the examination library of London Luton Airport Expansion DCO (REP11-041).

The applicant should also include a Part 4 to the Land Rights Tracker comprising the information in the table below. This 'overview' table should be updated at each deadline if any changes arise.

<table><tr><td>Land Type</td><td></td></tr><tr><td>CA of land</td><td></td></tr><tr><td>CA of rights</td><td></td></tr><tr><td>Temporary Possession</td><td></td></tr><tr><td>Crown Land</td><td></td></tr><tr><td>Stat Undertaker Land</td><td></td></tr><tr><td>Agricultural Tenancies</td><td></td></tr><tr><td>Entire Order limits</td><td></td></tr></table></td><td></td></tr>
</table>

ExQ	Respondent	Question	Applicant's Response
CA1.19	The Applicant	Land Parcel 10-006 The ExA note that Mrs Susan Hunt has a Category 2 interest in land parcel 10-006 in the BoR [REP1-011]. As set out in Mrs Hunt's submissions [RR-4457 and REP1-241], she is concerned about the lack of engagement from the applicant, particularly with regard to the sensitive topic of the location and potential impact on her deceased husband's ashes. The ExA note that the applicant provided a response to the representations at deadline 2 (D2) in its 'Response to Written Representations' on page 1268 of 1914 [REP2-039], however, it has not clarified that it has directly engaged with Mrs Hunt over her concerns. The ExA requires an update from the applicant with regard to the discussions had and any reassurances given to Mrs Hunt over land parcel 10-006.	The Applicant notes the sensitivity of this submission and has contacted Mrs Hunt's daughter to confirm the full extent of the right of access identified from the information available at the Land Registry. If the right of access is confirmed as only affecting land outside of the Order Limits, which the Applicant currently understands, then the Applicant will remove Mrs Hunt as a Category 2 interest and does not consider there will be any impact on the right of access.
CA1.20	The Applicant	Application Changes and Compulsory Acquisition	The Applicant refers the ExA to the **Change Notification [EN010168/EXAM/9.35]** submitted at Deadline 3 which confirms that Change 1 will engage the Infrastructure

ExQ	Respondent	Question	Applicant's Response
		Does the applicant envisage any changes to the application during the examination which might engage The Infrastructure Planning (Compulsory Acquisition) Regulations 2010?	Planning (Compulsory Acquisition) Regulations 2010 (Ref 10).
CA1.21	Statutory Undertakers	Planning Act 2008 If you have not already done so in a relevant representation (RR) or written representation (WR) to date, please set out your position with regards to the tests under s127 and s138 of the Planning Act 2008, as applicable to your respective interests.	The Applicant considers that the protective provisions contained in the **draft DCO [REP1-007]**. In the event that the Applicant is not able to reach agreement on the form of the protective provisions with the relevant statutory undertaker prior to the close of the Examination, the Applicant will provide further written submissions on how the tests have been satisfied.
CA1.22	Hawker Farms Ashton Hawker	Plan of Agricultural Landholdings/ Agricultural Tenancies Q1 The ExA note your RRs [RR-0431] and [RR-1793] whereby you state that the proposed CA of land that you own, plus an additional approximately 100 acres that you rent, would critically undermine your business model. The ExA would find it helpful if you could submit a plan showing your agricultural landholdings/ tenancies in the context of the local Order limits and indicating the land where the	The Applicant notes that the response is directed to the landowner and confirms that in REP1-198 of the **Applicant's Response to Written Representations [REP2-039]**, it is stated that the final easement required for the delivery of the Scheme would comprise of 9 acres within the respondent's tenancy and 5 acres within the respondent's ownership. As set out in the Deadline 3 update within the **Land Rights and Negotiations Tracker [EN010168/APP/4.4]** (Revision 5), the

ExQ	Respondent	Question	Applicant's Response
		applicant is seeking permanent acquisition, permanent rights or TP. Any other information on how each of the land parcels are used (pastoral, grazing, arable, mixed, agri-environment scheme) and their agricultural land classification, would also be considered a useful submission, along with a summary of negotiations with the applicant to date.	respondent is maintaining their position not to sign the Heads of Terms at this stage. The Applicant is committed to engage with the respondent throughout Examination to progress a voluntary agreement.
CA1.23	Richard Tanner Isabel Ross	Plan of Agricultural Landholdings/ Agricultural Tenancies Q2 The ExA note your RR [RR-3970] whereby you state that your farm is surrounded by the cable route and eliminates your home pastures during construction, meaning that your rare breed sheep flock would need to be sold due to the loss in grassland, and the equestrian business closed down during construction. The ExA would find it helpful if you could submit a plan showing your agricultural landholdings/ tenancies in the context of the local Order limits and indicating the land where the applicant is seeking permanent acquisition, permanent rights or TP. Any other information	The Applicant notes that the response is directed to the landowner and points to the Deadline 3 update within the **Land Rights and Negotiations Tracker [EN010168/APP/4.4]** (Revision 5), where it is stated that the Applicant continues to engage with the landowner and their agent. Since Deadline 2, the Applicant has continued work towards resolving the final material clause of the voluntary agreement and most recently emailed the landowner's agent on 11 June 2026. The Applicant will continue to engage with the landowner and their agent and is confident the necessary land rights can be acquired by voluntary agreement.

ExQ	Respondent	Question	Applicant's Response
		on how each of the land parcels are used (pastoral, grazing, arable, mixed, agri-environment scheme) and their agricultural land classification, would also be considered a useful submission, along with a summary of negotiations with the applicant to date.	
CA1.24	Roberts Berry Farm / Cole Family	Plan of Agricultural Landholdings/ Agricultural Tenancies Q3 The ExA note your RRs [RR-2028], [RR-3732] and [RR-4027] whereby you collectively state that the proposed cable route bisects your pasture land causing access and grazing issues, and entailing the destruction of historic pasture land and established biomass crop, and the removal of mature trees. The ExA would find it helpful if you could submit a plan showing your agricultural landholdings/ tenancies in the context of the local Order limits and indicating the land where the applicant is seeking permanent acquisition, permanent rights or TP. Any other information on how each of the land parcels are used (pastoral, grazing, arable, mixed, agri-environment scheme) and their agricultural land classification, would also be considered a	The Applicant notes that the response is directed to the landowner and points to the Deadline 3 update within the **Land Rights and Negotiations Tracker [EN010168/APP/4.4]** (Revision 5), where it is stated that the Applicant continues to engage with the landowner and their agent. Further to the tracker, the Applicant has compiled a **Land and Rights Communications Log [EN010168/EXAM/9.31]** recording all communications with the respondent in respect of the project. The respondent confirmed on 09/12/2025 that they will not sign a voluntary agreement ahead of discussing and negotiating accommodation works. The Applicant will continue to engage with the landowner and their agent to discuss the appropriate accommodation works and is

ExQ	Respondent	Question	Applicant's Response
		useful submission, along with a summary of negotiations with the applicant to date.	confident the necessary land rights can be acquired by voluntary agreement.
CA1.25	Manor Farm / Brunt Family:	Plan of Agricultural Landholdings/ Agricultural Tenancies Q4 The ExA note your RRs [RR-2517], [RR-2611], [RR-2845] and [RR-2921] whereby you state that your family are deeply concerned about the impact the solar park would have on the future of your farm. The ExA would find it helpful if you could submit a plan showing your agricultural landholdings/ tenancies in the context of the local Order limits and indicating the land where the applicant is seeking permanent acquisition, permanent rights or TP. Any other information on how each of the land parcels are used (pastoral, grazing, arable, mixed, agri-environment scheme) and their agricultural land classification, would also be considered a useful submission, along with a summary of negotiations with the applicant to date.	The Applicant notes that the response is directed to the landowner and points to the Deadline 3 update within the **Land Rights and Negotiations Tracker [EN010168/APP/4.4]** (Revision 5), where it is stated that the Applicant continues to engage with the landowner and their agent. Further to the tracker, the Applicant has compiled a **Land and Rights Communications Log [EN010168/EXAM/9.31]** recording all communications with the respondent in respect of the Scheme. The Applicant has confirmed to the AP that it is currently collating information specific to this plot before holding a meeting to discuss the nature of the works required. Following the ASI on 11 June, the Applicant and AP held a discussion regarding the plot affected which forms part of the street works at Grittleton junction relating to AIL movements and will

ExQ	Respondent	Question	Applicant's Response
			continue to inform the AP via further engagement.
CA1.26	Matthew Gerard Newman	Plan of Agricultural Landholdings/ Agricultural Tenancies Q5 The ExA note your RR [RR-3090] and WR [REP1-228] whereby you state that you will be directly affected by the cable route, it would cut your modest holding in two, leaving you with no access to one half of the farm, thus ending your business and 5 generations of farming. The ExA would find it helpful if you could submit a plan showing your agricultural landholdings/ tenancies in the context of the local Order limits and indicating the land where the applicant is seeking permanent acquisition, permanent rights or TP. Any other information on how each of the land parcels are used (pastoral, grazing, arable, mixed, agri-environment scheme) and their agricultural land classification, would also be considered a useful submission, along with a summary of negotiations with the applicant to date.	The Applicant notes that the response is directed to the landowner and points to the Deadline 3 update within the **Land Rights and Negotiations Tracker [EN010168/APP/4.4]** (Revision 5), where it is stated that the Applicant continues to engage with the landowner and their agent. Further to the tracker, the Applicant has compiled a **Land and Rights Communications Log [EN010168/EXAM/9.31]** recording all communications with the respondent in respect of the Scheme.
CA1.27	Jackie Greenhill	Plan of Agricultural Landholdings/ Agricultural Tenancies Q6	The Applicant notes the direction of the question to the respondents and welcomes the

ExQ	Respondent	Question	Applicant's Response
	Andrew Greenhill	The ExA note your RRs [RR-0252] and [RR-1978] whereby you state that you will be losing Grade 2 agricultural fields, which would make it impossible for you to keep farming. The ExA would find it helpful if you could submit a plan showing your agricultural landholdings/ tenancies in the context of the local Order limits and indicating the land where the applicant is seeking permanent acquisition, permanent rights or TP. Any other information on how each of the land parcels are used (pastoral, grazing, arable, mixed, agri-environment scheme) and their agricultural land classification, would also be considered a useful submission, along with a summary of negotiations with the applicant to date.	request for further more detailed information, including cropping data, on how each land parcel is used. The landowner, supported by the Applicant, is committed to further discussions with the tenants regarding the potential arrangements that may apply if the Scheme was to be consented and land is required to be surrendered from the existing tenancy. In those circumstances, the landowner has indicated the tenants would be offered suitable compensation in respect of the affected land for the remainder of the applicable tenancy period. This would be considered alongside any relevant surrender provisions and break clauses contained within the existing tenancy arrangements. Any commercial income designed to meet historic agricultural returns received in connection with the surrender of land could provide the tenant with an opportunity to secure or farm alternative land of a similar agricultural quality and productive yield,

ExQ	Respondent	Question	Applicant's Response
			subject to availability and the tenant's own commercial decisions. Should the Scheme be granted consent, the Applicant would continue to support engagement between the affected landowner and tenant, where appropriate, with the aim of facilitating a voluntary arrangement that takes account any effects on the agricultural holding.
CA1.28	Bridget Marie Gregory	Plan of Agricultural Landholdings/ Agricultural Tenancies Q7 The ExA note your RR [RR-0542] whereby you state that the cable route will pass directly through several fields of your farm, including one only metres from a farm building and slurry lagoon due to be built this spring, which would considerably disrupt your business regarding crops and livestock grazing. The ExA would find it helpful if you could submit a plan showing your agricultural landholdings/ tenancies in the context of the local Order limits (as well as the location of the proposed	The Applicant notes that the respondent is included as a tenant in Part 3 of the **Land Rights and Negotiations Tracker [REP2-006]**. The Applicant continues to negotiate and finalise the voluntary agreements with the respective landowner. Once the agreement is secured with the landowner, the Applicant will engage with the tenant to understand the necessary and appropriate accommodation works and is confident the necessary land rights can be acquired by voluntary agreement.

ExQ	Respondent	Question	Applicant's Response
		farm building and slurry lagoon referred to in your representation) and indicating the land where the applicant is seeking permanent acquisition, permanent rights or TP. Any other information on how each of the land parcels are used (pastoral, grazing, arable, mixed, agri-environment scheme) and their agricultural land classification, would also be considered a useful submission, along with a summary of negotiations with the applicant to date.	
CA1.29	Clyde Stanley Burgess Claire Burgess	Plan of Agricultural Landholdings/ Agricultural Tenancies Q8 The ExA note your RRs [RR-0853] and [RR-0916] whereby you state your concerns about the project directly impacting your ability to grow crops, feed livestock, and earn a living from your land. The ExA would find it helpful if you could submit a plan showing your agricultural landholdings/ tenancies in the context of the local Order limits and indicating the land where the applicant is seeking permanent acquisition, permanent rights or TP. Any other information on how each of the land parcels are used (pastoral, grazing, arable,	The Applicant notes that the respondent is included as a landowner in Part 1 of the **Land Rights and Negotiations Tracker [REP2-006]**. The Applicant is negotiating the terms of a voluntary agreement with the respondent's agent and a copy of the latest engagements can be found in the **Land and Rights Communications Log [EN010168/EXAM/9.31]**. The Applicant will then identify appropriate and necessary accommodation works with the respondent's agent to ensure where reasonably practicable the continuance of the current operations. The

ExQ	Respondent	Question	Applicant's Response
		mixed, agri-environment scheme) and their agricultural land classification, would also be considered a useful submission, along with a summary of negotiations with the applicant to date.	Applicant is confident the necessary land rights can be acquired by voluntary agreement.
CA1.30	John Baillie	Plan of Agricultural Landholdings/ Agricultural Tenancies Q9 The ExA note your RR [RR-2342] whereby you state your concerns about the project impacting upon your field drains, which cross one of the solar fields, and the lack of assurance about how this is going to be addressed. The ExA would find it helpful if you could submit a plan showing your agricultural landholdings/ tenancies in the context of the local Order limits, indicating the location of the field drain(s) in question, and any land where the applicant is seeking permanent acquisition, permanent rights or TP. Any other information on how each of the land parcels are used (pastoral, grazing, arable, mixed, agri-environment scheme) and their agricultural land classification, would also be considered a	The Applicant notes that the respondent is included as a landowner in Part 1 of the **Land Rights and Negotiations Tracker [REP2-006]**. The Applicant is negotiating the terms of a voluntary agreement with the respondent's agent and a copy of the latest engagements can be found in the **Land and Rights Communications Log [EN010168/EXAM/9.31]**. The Applicant discussed with the respondent in a meeting on the 10/04/2026 the drainage strategy and the position on compensation and reinstatement. The Applicant will continue to engage with the landowner including where information is provided relating to specific drainage requirements. The Applicant is confident the necessary land rights can be acquired by voluntary agreement.

ExQ	Respondent	Question	Applicant's Response
		useful submission, along with a summary of negotiations with the applicant to date.	
CA1.31	KMT Farming and Consultancy on behalf of Mr and Mrs Eavis	Agricultural Land Parcel Use and Engagement with the Applicant The ExA note your RR [RR-1963] and your subsequent WR at D1 [REP1-164] which highlights the potential impacts on Mr and Mrs Eavis' farming enterprise as a result of the proposed cable route corridor (CRC). Within your WR you attach a plan showing the extent of the Eavis' farm and the proposed affected area. Can you also provide additional information on how each of the land parcels for the whole farm are used (pastoral, grazing, arable, mixed, agri-environment scheme) and a summary of the attempts to engage with the applicant and the current status of negotiations.	The Applicant notes that the respondent is included as a landowner in Part 1 of the **Land Rights and Negotiations Tracker [REP2-006]**. The Applicant is negotiating the terms of a voluntary agreement with the respondent's agent and a copy of the latest engagements can be found in the **Land and Rights Communications Log [EN010168/EXAM/9.31]**. The Applicant will then identify appropriate and necessary accommodation works with the respondent's agent to ensure where reasonably practicable the continuance of the current operations. The Applicant is confident the necessary land rights can be acquired by voluntary agreement.
CA1.32	Andrew Rowell	Plan of Land/ Property Within your RR [RR-0282] you ask *'what damage will be done to my land for cable laying. Can I request additional remedial work to be done as part of any agreements.'* The ExA has been unable to identify your name or	The Applicant is not aware of the respondent having an interest within the Order limits.

ExQ	Respondent	Question	Applicant's Response
		property within the applicant's Book of Reference [REP1-011]. The ExA would therefore find it helpful if you could submit a plan showing the location of the land which you refer to, to determine if you are specifically affected by CA of land and/or rights, or TP.	
CA1.33	Carter Jonas for Messrs Nicholas The Applicant	Land Use Clarification and Book of Reference Update The ExA note Carter Jonas' RR [RR-3146] whereby it refers to the applicant's excessive land requirement over its clients' land near Melksham Substation. The ExA also notes the comments regarding the applicant's omission from the BoR of your clients' Category 1 interest in Plot 16-014. Carter Jonas: The ExA would find it helpful if Carter Jonas could submit a plan showing its clients' landholdings/ tenancies in the context of the local Order limits and indicating the land where the applicant is seeking permanent acquisition, permanent rights or TP. Any other information on how each of the land parcels are used (pastoral, grazing, arable, mixed, agri-	The Applicant acknowledges the comment within RR-3146 regarding the omitted land interest in plot 16-014. The Applicant has included this land interest in an updated **Book of Reference [EN010168/APP/4.3]** (Revision 3) and the **Land and Rights Negotiations Tracker [EN010168/APP/4.4]** (Revision 5) at Deadline 3.

ExQ	Respondent	Question	Applicant's Response
		environment scheme, other) would also be considered a useful submission, along with a summary of negotiations with the applicant to date. The Applicant: The applicant responded to the RR in [PDA-009] acknowledging the BoR omission, advising it would update the BoR at D1. The ExA has reviewed the updated BoR submitted at D1 [REP1-011 (clean) and REP1-012 (tracked)] and notes that it has not been amended to include Messrs Nicholas' land interest in Plot 16-014. The applicant should revisit and rectify this omission, update the Land Rights Tracker accordingly and provide summary of negotiations with Messrs Nicholas or their representatives to date.	

2.4 Climate Change

ExQ	Respondent	Question	Applicant's Response
CC1.1	The Applicant	Carbon Calculation Appendix B of Wiltshire Council's WR [REP1-138] provides a copy of their commissioned greenhouse gas (GHG) emissions report by the University of Exeter titled 'GHG emissions at Lime Down Solar Park: Methodology Review by University of Exeter Centre for Energy and the Environment'. Stop Lime Down (SLD) also submitted a review of ES chapter 7 [REP1-182]. These documents raise question marks over the applicant's own GHG assessment included in [APP-059]. The ExA note that discussions with the Council are underway in relation to climate change as shown in the Statement of Common Ground (SoCG) [REP2-025]. However, the applicant is asked to respond to these reports and the concerns raised by Wiltshire Council in section 11 (pages 48 – 52) of [REP1-138]. The applicant is also asked to ensure and confirm that there is no double counting in the assessment and to pay attention to and	The Applicant has prepared a response to the University of Exeter report in **Climate Response to Wiltshire Council Appendix B of Written Rep and SLD Appendix J1 [EN010168/EXAM/9.33]** submitted at Deadline 3 to respond to the points raised.

ExQ	Respondent	Question	Applicant's Response
		address the wording of section 5.3 of the NPS EN1 to ensure policy compliance.	
CC1.2	The Applicant	Carbon Calculation – Operation, Maintenance and Decommissioning The applicant is asked to confirm that the assessment of GHG emissions contained in ES Chapter 7 [APP-059] considers the manufacture and transportation of replacement parts from China to the site during the operation/maintenance period in addition to the initial construction phase. This should also include details of replacement parts to cater for damage/failure during operation. The applicant is asked to confirm that the figures include the recycling of all relevant parts during replacement and decommissioning. If not, these figures should be updated accordingly or provide a justification for this exclusion.	The Applicant prepared a response to the University of Exeter report in **9.33 Climate Response to Wiltshire Council Appendix B of Written Rep and SLD Appendix J1 [EN010168/EXAM/9.33]** produced at Deadline 3 to respond these concerns. The assessment includes a number of conservative assumptions. These include the assumption that solar modules are imported from China with associated international freight emissions, replacement of solar modules during the operational life of the Scheme, replacement of battery systems at regular intervals throughout the Scheme lifetime, replacement of inverters and transformers, and replacement of a proportion of on-site cabling. These assumptions were intentionally selected to avoid underestimating lifecycle greenhouse gas emissions.
CC1.3	The Applicant	Carbon Calculation – Panel Types The applicant is asked to confirm that the use of tracker panels has been considered as part	The Applicant confirms that all calculations have been prepared based on tracker panels.

ExQ	Respondent	Question	Applicant's Response
		of the carbon calculation in ES Chapter 7 [APP-059] as the worst-case scenario. If not, update your figures accordingly.	
CC1.4	The Applicant, Wiltshire County Council	**Carbon Cost of Subsequent Food Imports** Wiltshire Council's Local Impact Report (LIR) [REP1-137] details that the loss of Best and Most Versatile (BMV) agricultural land associated with the site equates to approximately 5,000 tonnes of crops/year. Over a period of 60 years this equates to some 300,000 tonnes during the operation of the proposed development. This does not include construction, decommissioning or other periods where the land is left fallow because of the development. The Applicant: You are asked whether replacement food importation should be considered in ES Chapter 7 [APP-059] as it would appear to be additional carbon emissions as a direct result of the development. If so, please provide these additional details. If not, provide an explanation. Wiltshire Council:	The Applicant has considered whether potential replacement food production and associated food imports arising from the temporary loss of agricultural land should be included within the GHG assessment presented in **ES Chapter 7 [APP-059]**. The Applicant does not consider that the inclusion of replacement food imports within the lifecycle GHG assessment would be appropriate. The assessment has been undertaken in accordance with the Institute of Sustainability and Environment and Professionals (ISEP, formerly IEMA, Ref 11) guidance and considers the direct and indirect lifecycle GHG emissions associated with the construction, operation, maintenance and decommissioning of the Scheme. The assessment therefore includes emissions arising from the manufacture, transport, installation, operation,

ExQ	Respondent	Question	Applicant's Response
		You are asked whether this should be considered in ES Chapter 7 [APP-059]. Please explain your answer and provide reasoning.	replacement and eventual decommissioning of Scheme components. Whilst the Scheme would result in a temporary change in land use, it is not possible to determine with any reasonable degree of certainty how agricultural markets would respond to any reduction in crop production from the Site over the operational life of the Scheme. Any replacement production could arise through a combination of increased domestic production elsewhere, changes in crop type, changes in agricultural practices, yield improvements, imports, exports or wider market responses. The location, production methods, quantities and transport routes associated with any such replacement food production are unknown and cannot be robustly quantified. As a result, any estimate of emissions associated with replacement food production or imports would be highly speculative and would not represent a robust assessment of the likely significant effects of the Scheme.

ExQ	Respondent	Question	Applicant's Response
			Furthermore, the GHG assessment adopts a conservative baseline assumption whereby existing activities on the Site are assumed to generate zero emissions (paragraphs 7.4.3 and 7.7.3 of **ES Volume 1, Chapter 7 Climate Change [APP-059]**). Consequently, the assessment does not claim any carbon benefit associated with the cessation or reduction of agricultural activities on the Site. The Applicant therefore considers that replacement food imports do not form part of the direct or indirect lifecycle GHG emissions of the Scheme that can be robustly assessed, and their exclusion is consistent with established GHG assessment guidance and proportionality principles within EIA.
CC1.5	The Applicant	**Carbon Sequestration** You are asked to provide details in the ES where carbon sequestration has been considered and calculated.	The Applicant has prepared a technical report **Climate Response to Wiltshire Council Appendix B of Written Rep and SLD Appendix J1 [EN010168/EXAM/9.33]** at Deadline 3 to respond to the points raised under section 4.
CC1.6	The Applicant	Carbon Emissions – Mitigation	The Applicant acknowledges the Examining Authority's request for more definite measures to reduce carbon emissions from construction,

ExQ	Respondent	Question	Applicant's Response
		In consideration of the outline Construction Environment Management Plan (oCEMP) [REP1-096], outline Operational Environmental Management Plan (oOEMP) [REP1-098] and the outline Decommissioning Strategy (oDS) [REP1-100] you are asked to commit to definite measures to reduce carbon emissions resulting from construction, maintenance and decommissioning. For example, using ultralow and/or zero emission vehicles and plant and providing the necessary infrastructure to support their use. The current language is considered too vague in that it only seeks to include measures 'encouraging' lower carbon modes of transport, for example. If this is not possible, you should explain why and reference how their approach meets the terms of NPS EN-1 section 5.3.	operation, maintenance, and decommissioning and these management plans have been updated at Deadline 3 to strengthen the commitments to the measures identified. In terms of the specific measures committed to, these are summarised below: The **Outline Construction Environmental Management Plan (CEMP) [REP2-019], Outline Operational Environmental Management Plan (OEMP) [REP2-021]** and **Outline Decommissioning Strategy [REP2-023],** already include measures to minimise GHG emissions, including efficient plant operation, minimisation of idling, material reuse, and sustainable staff travel. The Applicant confirms that, in the detailed version: a. The use of ultra-low or zero emission vehicles and plant will be required where feasible, with necessary on-site charging or refuelling infrastructure provided. b. Staff travel measures, including mandatory car-sharing, shuttle buses, cycling, and use of public transport, will be implemented.

ExQ	Respondent	Question	Applicant's Response
			c. Monitoring and reporting of GHG emissions from construction, maintenance, and decommissioning will be conducted to ensure compliance with these mitigation measures. These measures will be implemented and enforceable, ensuring that carbon emissions are actively minimised rather than merely encouraged, in line with best practice and the UK's carbon reduction objectives. Furthermore, a wholly zero-emission plant fleet for the construction of the Scheme is not presently a realistically achievable scenario particularly in regard to heavier plant equipment and vehicles. There are however, contractors and suppliers capable of providing low emission and electrical plant equipment for selected activities required during the construction of the Scheme, and the Applicant shall seek to maximise the use of where it is technically possible to do so. Where zero emission plant is unavailable or unsuitable, the Applicant will seek the use of the lowest

ExQ	Respondent	Question	Applicant's Response
			emission practical alternative to ensure active minimisation. The Applicant considers it has appropriately addressed all matters set out at paragraph 5.3.4 of NPS EN-1. As set out at paragraph 7.9.1 of **ES Volume 1, Chapter 7 – Climate Change [APP-059]**, the mitigation measures required to be captured by a GHG Reduction Strategy for minimising emissions are included within the **Outline CEMP [REP2-019]** and the **Outline OEMP [REP2-021]**. Similar measures will be developed for the decommissioning phase for the use of lower-carbon and more climate change resilient methods as detailed in the **Outline Decommissioning Strategy [REP1-100]**.

2.5 Cultural Heritage

ExQ	Respondent	Question	Applicant's Response
CH1.1	The Applicant	Embedded Mitigation Section 12.9 of ES Chapter 12 [APP-064] describes the embedded mitigation measures that aim to, as far as reasonably practicable, avoid and reduce impact and effects on cultural heritage. Those measures include partial and entire removal of solar PV panels from multiple field parcels. No comprehensive plan of those field parcels is seemingly provided with the cultural heritage assessment (although this would be highly useful), but the ExA assumes that the field parcels shown in ES Figure 4-4 [APP-088] correspond with the field parcels referred to in section 12.9 of ES Chapter 12. Please confirm or provide a relevant plan. Can the applicant explain why the full extent of those panel-free parcels are being retained in the Order limits and for what purpose those fields would be used? For the avoidance of doubt, this question relates to the stated partial removal of proposed solar PV Panels from fields A1, A4,	ES Volume 2, Figure 4-4 Main infrastructure layout changes between PEIR and DCO Application submission **[APP-088]** shows the field parcels referred to in section 12.9 of **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, where PV panels have been removed since PEIR stage. The **Works Plans [REP1-005]** also show the land usage for the duration of the Scheme including areas where panels are proposed and areas proposed for habitat management where panels are not proposed (i.e. Work No.9.). The following plans show the proposed land usage of areas where PV panels are proposed. a. **ES Volume 2 Figure 3-4-1 to 3-4-2 Landscape and Ecology Mitigation Plan [REP1-029]**; b. **ES Volume 2 Figure 3-4-3.1 to 3-4-3.2 Landscape and Ecology Mitigation Plan [REP1-030]**;

ExQ	Respondent	Question	Applicant's Response
		B6, B11, C9, C10, C15, C21, C23, C31, D4, D6, D11 and E1, and entire removal of solar PV panels from fields A8, A11, A12, B1, B12, C1, C2, C3, C4, C6, C8, C13, C16, C20, C24, C25, C26, C27, C28, C35, D9, D10, E5, E7, E8, E9, E10, E16, E22 and E30 as a result of heritage or archaeological sensitivities.	c. **ES Volume 2 Figure 3-4-4.1 to 3-4-4.2 Landscape and Ecology Mitigation Plan [REP1-030]**; d. **ES Volume 2 Figure 3-4-5.1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [REP1-032]**. Many of the areas where archaeological remains have been identified have been retained for ecological mitigation and BNG enhancement such as diverse wildflower meadow, set aside (for ground nesting bird mitigation) and grassland. As stated in paragraph 2.10.102 of NPS EN-3, *"heritage assets may be protected by a solar PV farm as the site is removed from regular ploughing".* Where possible the Applicant has looked to retain areas containing archaeological remains within the Order Limits and identify land use for the duration of the Scheme that would result in less ground disturbance than that currently caused by plough activity.
CH1.2	The Applicant	**Heritage Visualisations 1**	The location of heritage-specific viewpoints was discussed with Stakeholders as part of the

ExQ	Respondent	Question	Applicant's Response
	Historic England Wiltshire Council	Paragraph 4.5.1 of ES Appendix 12-1 (Heritage Statement) [APP-219] states that heritage visualisations were agreed with Wiltshire Council on January 2024 (Annex E). However, Annex E only provides a list of heritage viewpoints. Can the applicant please direct the ExA to where the visualisations for these viewpoints are provided? If they have not been provided with the application material, then these are to be provided in response to this ExQ. Historic England and Wiltshire Council are also invited to suggest additional visualisations which they consider should be provided by the applicant to assist the examination, and may find the following documents helpful to inform their consideration – ES Figure 8-10 [APP-099] and ES Figure 12-1 [APP-143]. The applicant is subsequently requested to provide the additional visualisations or justification as to why not.	discussions on the approach to the assessment (see Table 12-2 of **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**). Working drafts of the viewpoint visualisations were used to inform the assessment; however, they were not issued as supporting figures to **Volume 3, Appendix 12.1: Heritage Statement [APP-219]**. Finalised illustrations have now been prepared and are provided in **Technical Addendum to Chapter 12, Appendix 12-1: Heritage Viewpoints [EN010168/EXAM/9.36]** at Deadline 3.
CH1.3	The Applicant	**Bradfield Manor Visualisations** At D1A the applicant submitted visualisations showing the view of the proposed development from Bradfield Manor [REP1A-014]. The visualisations appear to just highlight the footprint of where solar development would	As stated in paragraph 8.9.31 of **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]** it is anticipated that hedgerow, trees shelterbelts and woodland planting will have a uniform growth rate of 0.4m every year. Therefore, by Year 15 trees, shelterbelts and

ExQ	Respondent	Question	Applicant's Response
		be located. Given the height of the solar PV panels, the applicant is asked whether, at both year 1 and year 15, the existing field pattern would be legible from these views or would the collection of fields where solar PV panels are proposed appear as a single mass of solar development?	woodland will have reached a minimum height of 7.5m and hedgerow will be maintained at a height of 4.5m. As demonstrated in **ES Volume 2 Figure 3-4-1 to 3-4-2, Figure 3-4-3.1 to 3-4-3.2, Figure 3-4-4.1 to 3-4-4.2, Figure 3-4-5.1 to 3-4-5.2 Landscape and Ecology Mitigation Plan (Rev 2) [REP1-029 to REP1-032]** and detailed in Table 8-11 of **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]** a 15m buffer had been applied to all existing hedgerow within the Scheme. Depending on the angle of view (both horizontally and vertically), existing height of hedgerow and spatial relationship between fields, some sections of the Scheme may potentially be perceived as a single mass at Year 1. By Year 15 it is anticipated that the enhancement of hedgerow and application of buffers between hedgerow and PV panels will mean that the legibility of field patterns will be visible.
CH1.4	The Applicant	**Heritage Mitigations Plan**	**T**he Applicant considers **ES Volume 2 Figure 3-4-1 to 3-4-2, Figure 3-4-3.1 to 3-4-3.2, Figure 3-4-4.1 to 3-4-4.2, Figure 3-4-5.1 to 3-**

ExQ	Respondent	Question	Applicant's Response
		Paragraphs 12.9.6 and 12.9.7 of ES Chapter 12 [APP-064] refer to enhanced visual screening and landscaping (including planting of shelter belts and scattered trees for example) to mitigate potential adverse effects upon heritage assets. The applicant refers to these mitigations as Code OFF and LM in Tables 5 to 9 in ES Appendix 12-8 (Cultural Heritage Impact Assessment Tables) [APP-232]. The applicant is requested to provide a set of plans to accompany ES Appendix 12-8 to show where Codes OFF and LM would be applied. The plans should show numbered field parcels to align with the commitments drafted in the oCEMP [REP1-096].	**4-5.2 Landscape and Ecology Mitigation Plan (Rev 2) [REP1-029 to REP1-032]** to provide the information as requested. These plans show offsets and where hedgerow will be reinforced. The code OFF is represented in the Landscape and Ecology Mitigation Plans as "Existing Vegetation To Be Retained And Enhanced", "Proposed Tussock Grassland Margins", "Proposed Damp Grassland". Proposed Ground Nesting Bird Mitigation", "Proposed Ground Nesting Bird Mitigation - Set Aside", "Proposed Diverse Wildflower Meadow" and "Proposed Low Density Scrub". The code LM is represented by "Hedgerow Reinforcement", "Proposed Native Hedgerow With Trees", "Proposed Native Woodland Belt", "Proposed Native Woodland Block" and "Proposed Riparian Corridor".
CH1.5	The Applicant	**Sensitivity of Receptor** Table 12-3 of ES Chapter 12 [APP-064] sets out the sensitivity level for types of heritage assets. In the medium sensitivity category, should the fourth bullet point say *'Regionally important archaeological features, sites and areas (as defined in the HER)'?* In addition, in the low sensitivity category, should the second bullet say *'Non-designated archaeological*	The Applicant confirms that the additions as suggested to Table 12-3 are acceptable. **ES Volume 1, Chapter 12: Cultural Heritage (Rev 2) [EN010168/APP/6.1]** has been updated at Deadline 3.

ExQ	Respondent	Question	Applicant's Response
		features and sites of local value, and/ or potential to contribute to local research objectives?' (Bold text is ExA's emphasis)	
CH1.6	Historic England Wiltshire Council	**Magnitude of Effects** Can Historic England and Wiltshire Council confirm if they are satisfied with the applicant's methodology for assessing the impact of the proposed development on heritage assets, particularly the criteria for determining the magnitude of effects, as set out in Table 12-4 of ES Chapter 12 [APP-064]?	Question not directed at the Applicant.
CH1.7	The Applicant	**Less than Substantial Harm** The applicant acknowledges that there is no direct correlation between the level of harm caused to a heritage asset (in NPS terms) and the significance of effects (in EIA terms). In that regard it considers negligible, minor and moderate/minor effects as not significant in Environmental Impact Assessment (EIA) terms. However, the applicant is explicitly asked to confirm if it regards negligible, minor and moderate/minor effects as less than substantial harm in policy terms? The ExA note that caselaw (*R.(oao James Hall and Company Limited) v City of Bradford Metropolitan District Council and Co-Operative*	Heritage assets were scoped out of the heritage assessment where it was identified that there was no potential for harm as a result of the Scheme. As such no assets were scoped out where it was identified that they would experience negligible, minor and moderate/minor effects. Scoped out assets for assessment are considered agreed with Historic England and Wiltshire Council. Annexes C and D of **ES Volume 3, Appendix 12-1: Heritage Statement [APP-219]** detail assets scoped out of assessment, where it was identified that the Scheme would not cause any potential impact to their significance.

ExQ	Respondent	Question	Applicant's Response
		Group Limited [2019] EWHC 2899 (Admin)) has established that even limited or negligible harm to a heritage asset is enough to fall within the remit of 'less than substantial harm'. The ExA therefore seeks clarification as to how many (if any) heritage assets (and which ones) were scoped out of the heritage assessment because of a judgement that they would only experience negligible, minor and moderate/minor effects.	As stated in paragraph 12.6.17 of **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]** there is no direct correlation between the level of harm caused (in NPS terms) and the significance of effects (EIA terminology as defined by **ES Volume 1, Chapter 6: Environmental Impact Assessment Methodology [APP-058]**. With consideration to the assessment provided in **ES Volume 1, Chapter 6: Environmental Impact Assessment Methodology [APP-058]** and **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, negligible to moderate/minor adverse effects can be considered to equate to less than substantial harm.
CH1.8	The Applicant	**Impact** Paragraph 5.4.2 of ES Appendix 12-1 (Heritage Statement) [APP-219] states that impact is assessed according to different levels, from neutral to beneficial with a range of degrees of harm, from slight to substantial. As detailed in caselaw (*R.(oao James Hall and Company Limited) v City of Bradford Metropolitan District Council and Co-Operative Group Limited [2019] EWHC 2899 (Admin)),* there are only three gradations of harm in	The Applicant agrees that using NPS terms there are three gradations in assessing harm to the significance of a heritage asset: no harm, less than substantial and substantial. The use of slight in paragraph 5.4.2 of **Volume 3, Appendix 12.1: Heritage Statement [APP-219]** equates to less than substantial harm.

ExQ	Respondent	Question	Applicant's Response
		heritage terms. Her Honour Judge Belcher found that there is substantial harm, less than substantial harm and no harm, and that there are no other grades or categories of harm. The ExA therefore requires clarification on the reference to 'slight' harm in paragraph 5.4.2 of ES Appendix 12-1.	
CH1.9	The Applicant Historic England Wiltshire Council	**Duration of Harm** The applicant states that the proposed development has the potential to indirectly impact heritage assets, but any such effects would be reversible following decommissioning of the proposal. The ExA is concerned about the inference that because the proposal has a capped 60 year duration, the ensuing harm to heritage assets is somehow nullified. The issue around whether a 60 year use is 'temporary' cuts across most topic areas, however, specifically for heritage, the ExA requires a clear position from the applicant on the weight they have ascribed to a time capped DCO when assessing the level of harm to heritage assets. Historic England and Wiltshire Council may also wish to comment on this matter.	In line with paragraph 5.9.12 of NPS EN-1 and Historic England GPA2: Managing Significance in Decision-Taking, the assessment has looked to understand the significance of heritage assets potentially affected by the Scheme, the potential impact of the Scheme on the significance of identified assets and where possible avoid, minimise and mitigate impact in line with appropriate policy and guidance (Ref 12; Ref 13). As such the duration of the Scheme has not been a factor in identifying the level of harm to heritage assets. As detailed in **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]** and Table 3 of **Volume 3, Appendix 12.8: Heritage Statement [APP-232]** where an impact has been identified, several criteria have been used to define the nature of the impact from the Scheme. This includes identifying elements

ExQ	Respondent	Question	Applicant's Response
			of the scheme that are reversable or temporary (i.e. will cease to occur beyond the duration of the Scheme or an individual phase of the Scheme) compared to those that have the potential to be permanent (i.e. exist beyond the Scheme duration). This includes consideration to landscape mitigation measures and ensuring a legacy landscape that enhances the historic landscape character. The tables also identify the duration of the impact i.e. short term (up to a year), medium term (between 1 and 5 years) and long term (lasting for longer than 5 years).
CH1.10	The Applicant	**Heritage Scoping Tables** Paragraph 12.7.3 of ES Chapter 12 [APP-064] states that numerous heritage assets and Conservation Areas within the study area were scoped out either due to lack of intervisibility or historical association between the assets and land within the Order limits. The paragraph cross refers the reader to the scoping tables in Appendix 1 of ES Appendix 12-1 (Heritage Statement) [APP-219], however, there is no Appendix 1 within that document. The ExA assumes that the reference in paragraph 12.7.3 of ES Chapter 12 should be to Annexes C and D of ES Appendix 12-1; please confirm	The assumption is correct, **Annexes C and D** of **ES Volume 3, Appendix 12-1: Heritage Statement [APP-219]** detail assets scoped out of assessment, where it was identified that the Scheme would not cause any potential impact to their significance. **ES Volume 1, Chapter 12: Cultural Heritage (Rev 2) [EN010168/APP/6.1]** has been updated at Deadline 3.

ExQ	Respondent	Question	Applicant's Response
		and correct the cross referencing error in paragraph 12.7.3.	
CH1.11	The Applicant	**Construction Phase and Direct Physical Impacts** Paragraph 12.8.2 of ES Chapter 12 [APP-064] states that there is potential for swipes, strikes, or vibration from Heavy Goods Vehicle (HGV) and construction traffic to cause direct physical impacts to heritage assets. The applicant is asked to clarify which heritage assets have the potential to be affected by construction traffic on construction traffic routes.	Paragraph 12.8.2 of **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]** considers all potential construction phase impacts to heritage assets as a result of the Scheme. **Volume 3, Appendix 12.8: Heritage Statement [APP-232]** identifies a potential for temporary changes to the setting of Grittleton Conservation Area due to construction traffic related to the Cable Route Corridor. Embedded mitigation has been applied with the routing of construction traffic to avoid any potential for direct impacts in **Outline Construction Traffic Management Plan (CTMP) [APP-287]**.
CH1.12	The Applicant	**Groundborne Vibration** Paragraph 3.5.18 of ES Appendix 12-1 (Heritage Statement) [APP-219] states that groundborne vibration impacts have been scoped out on the basis that the resurfacing of the roadway as part of the scheme would result in a smoother running surface and would therefore reduce any existing vibration impact that may already exist. Can the applicant	Paragraphs 3.5.15 to 3.5.19 of **Volume 3, Appendix 12.1: Heritage Statement [APP-219]** relate to impacts as a result of construction traffic. Vibrational impacts on heritage assets were also considered from other ground bourne activities (i.e. piling). No vibrational impacts were identified that would cause direct harm to any heritage assets as a result of the Scheme.

ExQ	Respondent	Question	Applicant's Response
		advise whether this means that vibration impacts on heritage assets from other groundborne activities, such as pile driving, have not been assessed?	**ES Volume 1, Chapter 14: Noise and Vibration [APP-066]** (paragraphs 14.10.29 to 14.10.40) identified that no receptors were located within 15 or 40m of the PV sites and substations, and as a consequence no significant vibration effects are expected from construction activities associated with the Solar PV Sites. Where receptors were identified as being within a proximity to the cable route corridor that might experience temporary Peak Particle Velocity (PPV) levels (a standard measure of vibrations effects) exceeding either the Lowest or Significant Observable Adverse Effect Level (LOAEL/SOAEL), it was identified that the short duration of activities, which could cause minor annoyance, would be mitigated through prior warning of their occurrence. No vibration is predicted to reach a level that would have the potential for building damage.
CH1.13	The Applicant	**Cable Route Corridor Geophysical Survey Update** The heritage assessment submitted with the application notes that a complete geophysical survey had not been completed on the entire CRC at the time of submission but that it was	The Applicant is committed to completing the geophysical survey on outstanding areas and has taken every opportunity to survey outstanding areas as they become available and land access is permitted from landowners. An area of approximately 10ha is currently

ExQ	Respondent	Question	Applicant's Response
		expected to be completed in the autumn of 2025. The applicant is required to provide the results in an updated ES Chapter 12 and an updated archaeological mitigation strategy to the ExA, Historic England and Wiltshire Council without further delay.	outstanding as a result of a tall and dense miscanthus crop, which has prevented the survey being undertaken. The crop is due to be harvested in June 2026. The Applicant has been in constant dialogue with landowners to ensure survey is undertaken at the earliest opportunity, while minimising and disturbance to agricultural activity. Both Wiltshire Council and Historic England have been kept informed of progress. Once all areas have been surveyed the ES Chapter and associated **Appendix 12.4, Archaeological Geophysical Survey Reports, and Appendix 12.5 [APP-223 to APP-224]** will be updated.
CH1.14	Wiltshire Council The Applicant	**Non-intrusive Construction Methodology** Paragraph 12.9.10 of ES Chapter 12 [APP-064] identifies the field parcels where non-intrusive construction methodology is proposed to protect identified buried archaeological remains. However, the paragraph seemingly reserves the right to employ strip, map and sample in those fields instead. This is repeated in paragraph 4.1.1 of ES Appendix 12-6 (Outline Archaeological Mitigation Strategy) [APP-230].	As stated in paragraph 12.9.10 of **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]** and paragraph 4.1.1 of **ES Volume 3, Appendix 12.6 Archaeological Mitigation Strategy [APP-230]**, where possible there will be a preference to conserve archaeological remains in situ. Where this is not achievable, the Applicant considers mitigation by record to also form appropriate approach to archaeological mitigation (i.e. through archaeological excavation and/or monitoring).

ExQ	Respondent	Question	Applicant's Response
		Wiltshire Council: Wiltshire Council is asked whether their agreement to this potential alternative method should be sought and secured through the Outline Archaeological Mitigation Strategy or the DCO. The applicant: If the applicant considers that consultation with and consent of the Local Authority to this potential alternative method is already secured, please direct the ExA to the particular control document or dDCO provision(s) in question.	**ES Volume 3, Appendix 12.6 Archaeological Mitigation Strategy (AMS)** [**APP-230**] is secured by Requirement 12 of the DCO. As stated in paragraph 1.1.2 of **AMS [APP-230]** *"Project Designs (Written Schemes of Investigation (WSI)) will be appended to the AMS for each phase of works."* These WSIs will detail the specific mitigation measures for individual sites, taking account of the detailed design. Where an alternative mitigation method is required - for example following detailed design - if it is identified that areas that are identified for preservation in situ should instead be subject to preservation by record in the form of excavation/monitoring- the relevant WSI will set out the revised methodology and provide sufficient information to demonstrate the change in methodology will deliver an appropriate and proportionate level of mitigation. WSIs will be approved by the relevant planning authority and are secured through Requirement 12(2) of the **draft DCO [REP1-007]** and *"No part of the authorised*

ExQ	Respondent	Question	Applicant's Response
			development may be commenced until a written scheme of investigation for that part has been submitted to and approved by the relevant planning authority."
CH1.15	The Applicant	**Draft Development Consent Order - Requirement 12** The applicant is asked to explain, with reference to the wording of Requirement 12 in the dDCO [REP1-007], how the relevant planning authority and Historic England would be involved in determining the scope for any subsequent archaeological work and additional mitigation measures in the detailed design, as a result of the archaeological investigation referenced in Requirement 12(1).	Please refer to the Applicant's response to DCO1.43. The Applicant has provided Wiltshire Council with the full evaluative trenching reports and awaits confirmation that these are signed off. On receipt of this confirmation, all evaluative archaeological work will be complete, enabling the current paragraph (1) of Requirement 12 to be removed. The subsequent written schemes of investigation will set out the mitigation required, based on the detailed design of the Scheme. The views of the archaeology officer at the Council and Historic England would inform the detailed WSIs, to ensure that any concerns can be addressed before the WSIs are submitted for approval under Requirement 12.
CH1.16	Wiltshire Council	**Grittleton House** The SoCG between the applicant and Wiltshire Council [REP2-025] records that Wiltshire Council considers there may be a need for	Question not directed at the Applicant.

ExQ	Respondent	Question	Applicant's Response
		additional mitigation for Grittleton House in relation to the temporary construction compound and cable route works within its setting. Wiltshire Council is asked to expand on what additional mitigation measures it considers would be necessary.	

2.6 Cumulative Effects

ExQ	Respondent	Question	Applicant's Response
CE1.2	All Local Authorities	**List of Cumulative Projects** The applicant considered a long list of projects when assessing cumulative effects. Are there any updates or comments regarding any of those applications identified, or have any new applications come to light that are significant enough to require consideration cumulatively with the proposed development? Your response should consider the D1A submission by Community Action: Whitley and Shaw (CAWS) Annex A Energy and Enabling Schemes in Shaw, Whitley and the Wider Melksham Substation Area [REP1A-019]	The Applicant has reviewed the list of schemes provided by CAWS **[REP1A-019]** and provided its response within the **Response to Deadline 1A submissions [APP2-040]**. In summary, of the thirty-six rows identified as 'Future NESO Connections', planning applications are identified for two schemes (Gastard BESS and Norrington Gate BESS), both of which are listed within **ES Volume 3, Appendix 21-1: Long List of In Combination Effects and Cumulative Developments Cumulative Long List [APP-264]** with Gastard BESS (PL/2024/10434) also on the Cumulative short list provided as Table 21-4 in **ES Volume 1, Chapter 21 Cumulative and In Combination Effects [APP-073]**. Twenty-two of the rows are part of the 'Future Energy Landscapes' community engagement process seeking to identify potential sites for renewable community energy initiatives. Currently, there are no planning applications for any of the sites listed. Seven of the rows are operational schemes and are taken into consideration as part of the baseline. The remaining rows are schemes either under construction, planned or with planning consent. These schemes are

ExQ	Respondent	Question	Applicant's Response
			taken into consideration as part of the cumulative assessment with the exception of the National Grid and SSEN enabling works. On the basis of limited disturbance and duration, these enabling works schemes are not considered likely to give rise to significant cumulative effects. Updates to the Wiltshire Council planning portal since July 2025 (when the ES cumulative list was finalised) have been reviewed. No schemes are identified with the potential to change the conclusions of **ES Chapter 21 Cumulative and In-Combination Effects [APP-073]**.

2.7 The Draft Development Consent Order

ExQ	Respondent	Question	Applicant's Response
Questions within this section refer to the dDCO updated at Deadline 1 [REP1-007] (clean version)/ [REP1-008] (tracked version)			
Articles			
DCO1.1	The Applicant	**Article 2(1) (Interpretation) Q1** Article 2(1) of the dDCO states that 'In this Order -- "the 1980 Act" means the Highways Act 1980(**o**)'. The footnote (**o**) does not appear on same page as the citation (page no. 4), rather has fallen onto page no. 5. Please ensure that all footnotes within the dDCO are included on the pages on which they are cited.	The footnote is included on page 5 because there is insufficient space on page 4. Footnote position and numbering is not manually controlled, and this footnote letter and location in the document is compliant with the SI Template.
DCO1.2	The Applicant	**Article 2(1) (Interpretation) Q2** A definition of "commercial use" is included within the Interpretations in Article 2, however, there is no subsequent use of the term in the dDCO. Please review and delete from Article 2 if no longer required.	The Applicant has reviewed the draft DCO and confirmed there has been an oversight whereby the term "commercial use" was not utilised. The definition of "date of decommissioning" and sub-paragraph (7) of Requirement 20 (decommissioning and restoration) have been amended to make use of this term. "*Date of decommissioning*" means in respect of each part of the authorised development, the date notified under requirement 20 that the

ExQ	Respondent	Question	Applicant's Response
			commercial use of that part of the authorised development has permanently ceased; Decommissioning Requirement – (7) Within 28 days of any part of the authorised development permanently ceasing to be in commercial use, the undertaker must notify the relevant planning authority.
DCO1.3	The Applicant	**Article 2(1) (Interpretation) Q3** The definition of "maintain" is very broad, such that removal, reconstruction or replacement of the whole of the authorised development could be possible without review of the environmental consequences of those activities. The ExA suggests that the definition is amended as follows with the inserted **bold** text in subsequent versions of the dDCO: *"maintain" includes inspect, repair, adjust, alter, remove, refurbish, reconstruct, replace and improve any part of,* ***but not remove, reconstruct or replace the whole of the*** *authorised development, and "maintenance" and "maintaining" are to be construed accordingly;*	The ExA's recommended amendment is considered to conflict with the intention that the scheduled replacement of all solar modules and battery energy storage system units is permitted as maintenance for this Scheme. It is relevant that Article 5(3) does not authorise the maintenance which is likely to give rise to any materially new or materially different effects in comparison with those reported in the environmental statement. In contrast to the approach taken in the recently made Orders referred to by the ExA, the scheduled replacement of all solar panels and batteries during the lifetime of the Scheme has been specifically assessed within the ES, and is therefore explicitly anticipated in the definition of maintenance. To retain clarity that scheduled replacement is a permitted maintenance activity, the text in bold was

ExQ	Respondent	Question	Applicant's Response
		If the applicant disagrees with this recommended revised definition, it is required to explain why.	intentionally omitted in the draft DCO for the Scheme.
DCO1.4	The Applicant	**Article 2(1) (Interpretation) Q4** The definition provided of "Order land" within Article 2 states '*the land shown coloured pink or blue on the land plan which is required for or is required to facilitate or is incidental to the authorised development and which is within the limits of land to be acquired or used and described in the book of reference*.' 1) Should this definition include land also coloured yellow on the land plan, which relates to temporary use of land and in relation to which it is proposed to temporarily suspend easements, servitudes and other private rights? 2) Could the definition also be simplified as follows (if not, why not): *"Order land" means the land shown coloured pink, blue or yellow on the land plans which is within the limits of land to be acquired or used and described in the book of reference;*	1) The "Order Land" is specifically the land within the Order Limits that may be compulsorily acquired, or over which new rights and restrictive covenants may compulsorily be imposed. It must not include the yellow land, over which only temporary possession may be taken, as the term is utilised in a number of operative provisions to provide permanent powers that would be inconsistent with the temporary use of the land shown in yellow. Article 21 (compulsory acquisition of land) provides the power for the undertaker to compulsorily acquire the Order Land. Article 24 (compulsory acquisition of rights) further provides that new rights and restrictive covenants may be imposed over any of the Order Land, but only to the extent set out in Schedule 9 in respect of the plots shown in blue. Article 29 confirms that the undertaker may acquire, and acquire rights in, the subsoil of the Order Land, without needing to also acquire a surface interest.

ExQ	Respondent	Question	Applicant's Response
			The term is also used in Article 31 to specifically distinguish between the land over which only temporary possession may be taken (being shown in yellow and listed in Schedule 11) and the Order land (over which the undertaker may also take temporary possession). Accordingly, it is not appropriate to expand the definition of "Order Land" to include the areas shown in yellow on the Land Plans, and doing so would undermine the limits on the compulsory acquisition powers granted to the undertaker. 2) The inclusion of "or is incidental to" within the definition is necessary to reflect the conditions that must be met for compulsory acquisition powers may be granted over the Order Land, set out in section 122 of the Planning Act 2008 (Ref 5). Subsection (2)(c) is that the land "is required to facilitate or is incidental to" the development to which the DCO relates.

ExQ	Respondent	Question	Applicant's Response
DCO1.5	The Applicant Wiltshire Council	**Article 2(1) (Interpretation) Q6** The definition of "permitted preliminary works" (PPW) is a broad list. The ExA understands that PPW sit outside the scope of commencement and could be carried out prior to the discharge of the requirements contained in Schedule 2 of the DCO and the approvals required therein. However, there is no associated control document(s) or DCO requirement to govern the scale and extent of PPW, or how the applicant should report any environmental impacts or potential environmental impacts encountered while carrying out PPW. The Applicant: 1) The ExA refers the applicant to Requirement 4(1) of the A122 (Lower Thames Crossing) DCO 2025, which required preliminary works to be carried out in accordance with a preliminary works environment management plan. [REP9-190] in the Lower Thames Crossing DCO Examination Library provides the final draft version of the preliminary works environment	The Applicant has considered the approach taken on the Lower Thames Crossing project. The use of a management plan for permitted preliminary works provides clarity for all parties that the carrying out of such works will not give rise to new or materially different environmental effects, by securing compliance with the relevant embedded mitigations. Whilst the Applicant notes that the permitted preliminary works on the Lower Thames Crossing project were significantly more extensive than for the Scheme, the concerns are recognised. The use of a management plan enables a tailored approach to securing controls on the permitted preliminary works, recognising that the potential for adverse effects differs based on the type of permitted preliminary work to be carried out. The Applicant is therefore preparing a permitted preliminary works environmental management plan. This will set out the methodology to be used for any permitted preliminary works, including any restrictions, for example to avoid ecological impacts from site clearance. The new management plan is intended to be provided at Deadline 4.

ExQ	Respondent	Question	Applicant's Response
		management plan that fed into Requirement 4(1). The ExA asks the applicant whether it would consider taking a similar approach to the Lower Thames Crossing DCO? 2) If not, the applicant is required to explain and justify why PPW seem to be uncontrolled, particularly when they are able to occur anywhere within the Order limits, at any time after the DCO comes into effect, and without any reporting mechanisms to or oversight from a consenting authority, such as Wiltshire Council, the Environment Agency, Natural England or similar. <u>Wiltshire Council</u>: The Council is asked: 1) If the definition of PPW is too widely drawn; 2) Whether greater control over PPW should be included within the dDCO; and if so 3) What information the Council requires to be provided and when (for example during the examination and in a dDCO Requirement or just in a dDCO Requirement for their approval post	In anticipation of this plan, the Applicant has updated Requirement 13 (construction environmental management plan) in Schedule 2 to the **draft DCO [REP1-007]** to require that the permitted preliminary works are carried out in accordance with the permitted preliminary works environmental management plan. Square brackets are retained around the plan name as this has not yet been finalised.

ExQ	Respondent	Question	Applicant's Response
		consent, but prior to any PPW taking place)?	
DCO1.6	The Applicant	**Article 2(1) (Interpretation) Q7** The ExA queries the definition of "public right of way" in Article 2(1), and whether it should be broadened to include any public right of way which is already on the definitive map and which is not extinguished by the Order? The ExA is unclear why the definition as drafted only refers to public rights of way that are added to the definitive map and statement after the making of the Order, particularly when Article 12 for example, relates to temporary closure, restriction or prohibition of use of streets and [existing] public rights of way. In that light, the definition of public right of way in Article 2(1) seems incorrect. The applicant is required to review.	The term "public right of way" is well understood and would not typically require a separate definition within the Order. The reason a definition is provided is to expand upon what is commonly understood by this term. The definition takes the ordinary meaning of public right of way and states that, for the purposes of the Order, it should be read as having both that meaning *and also* that it includes any public right of way that is added to the definitive map and statement after the Order is made. The Office of Parliamentary Counsel Drafting Guidance (June 2020) notes this as one of two main kinds of definition, stating (Ref 14): *"Inclusive / exclusive definitions that adapt the meaning that the defined term would otherwise have by clarifying potential doubt or expanding or limiting the meaning. It is usual to use "includes/does not include" for this sort of definition."*

ExQ	Respondent	Question	Applicant's Response
			The Applicant is confident that this definition is appropriate and correct.
DCO1.7	The Applicant	**Article 2(1) (Interpretation) Q8** The ExA seeks clarification from the applicant on whether the following terms should be defined in Article 2(1): • Boundary treatment (appears in Article 3 and Work Nos. 6, 9, 10, and Schedule 9) • Electrical cables/cabling (appears in Work Nos. 2, 3, 5) • Limits of deviation (appears in Schedule 15, Part 9 - for the protection of drainage authorities, page 202) • Battery energy storage system (Work No. 2)	The Applicant considers that each of the terms identified has a plain English meaning that is readily understood by the reader of the legislation. It is not typical to define terms where their natural meaning is clear, particularly in context and there is no nuance in how the term is used that must be clarified. In relation to boundary treatment, the Applicant's position is that its meaning is clear in article 31(5)(d) as it can readily be inferred from context to mean some alternative method that defines a boundary: "fencing or boundary treatments". In Schedule 1, the term is similarly always used in the context of "fencing, gates, boundary treatment and other means of enclosure". The Applicant is confident that its meaning is clear. Electrical cables and cabling are readily understood. It is noted that the Electricity Act 1989 does not define electrical cables, but

ExQ	Respondent	Question	Applicant's Response
			instead uses the term "cable" to assist in defining "electric line" and "line" (see section 64(1) of the Electricity Act 1989, Ref 6). Battery energy storage system is self-explanatory and attempts to define it beyond the plain, natural meaning would risk a loss of clarity. Finally, the term "limits of deviation" is not used in the Order and its inclusion within the protective provisions for drainage authorities is an error. This has been corrected in the updated **draft DCO** submitted at Deadline 3 and now refers to the Order limits.
DCO1.8	The Applicant	**Article 5 – Power to Maintain** Article 5(3) does not follow best practice. It should be modified to include the underlined words as follows: *(3) This article does not authorise the carrying out of any works which are likely to give rise to any materially new or materially different effects <u>that have not been assessed</u> in the environmental statement.*	The Applicant is content to make this change and has done so in the updated **draft DCO** submitted at Deadline 3.
DCO1.9	The Applicant	**Article 6 – Disapplication and Modification of Legislation Q1**	The Applicant has used the SI template to prepare the draft DCO. The Applicant has

ExQ	Respondent	Question	Applicant's Response
		The applicant is asked to review the placement and style of the bracketed alphabetised footnotes within the body of the text of Article 6. For example, Article 6(1)(b) states *'Section 32 (variation of awards)(b) of the Land Drainage Act 1991;'* The ExA queries whether the bracketed (b) should be in **bold** text to indicate it is a footnote, and whether it should be placed after '…1991' instead of after '…awards)'. There are other occasions where this approach is repeated. The ExA requests that the applicant reviews all footnotes within the entire dDCO to ensure that they are in the correct location and that they are in **bold** text so that they are distinguishable and not confused with subsections of the various legislative provisions cited.	checked the footnotes and confirms that all are appropriately formatted with the footnote letter reference in bold text. The Applicant is mindful that it is not always clear that the footnote is in bold, however this is not something that can be updated as it would mean the draft DCO is no longer compliant with the SI Template. The Applicant has reviewed statutory drafting convention and confirmed that the footnote should be placed: - after the name of the Act where this is the first reference to provisions of that Act; and - after the referential text in brackets for subsequent references. This has been amended in the **draft DCO** submitted at Deadline 3.
DCO1.10	The Applicant	**Article 6 – Disapplication and Modification of Legislation Q2** Paragraphs 4.2.12 to 4.2.19 of the EM [REP1-009] explains that Article 6 disapplies a number of statutory provisions and refers to previous DCOs as precedent justifications for the inclusion of similar powers in the Lime	The disapplications in Article 6(1) are: (a) section 23 (prohibition of obstructions, etc. in watercourses) of the Land Drainage Act 1991. This is the requirement for 'ordinary watercourse consent' for works that may obstruct ordinary watercourses. It is a s150 of the Planning Act 2008 consent meaning it can

ExQ	Respondent	Question	Applicant's Response
		Down dDCO. Nevertheless, the EM provides limited information regarding the reasons for disapplying any of the provisions specified in Article 6(1)(a) to (f) (notably, the Land Drainage Act 1991, the Water Resources Act 1991, the Environmental Permitting (England and Wales) Regulations 2016, and the legislation listed in Schedule 3) or the implications of disapplication. The applicant is required to explain and update the EM with the following information: the purpose of the disapplied legislation/statutory provision the body responsible for the disapplied legislation/statutory provision an explanation as to the effect of disapplication and whether any protective provisions or requirements are required to prevent any adverse impact arising as a result of disapplying the legislative controls (by reference to section 120 of and Schedule 5 to the Planning Act 2008) how each disapplied	only be disapplied with the agreement of the consenting body, here the Lead Local Flood Authority (LLFA) (Ref 5). The protective provisions for the Lead Local Flood Authority in Part 9 of Schedule 15 to the **draft Development Consent Order [REP1-007]**] replicate the regulatory regime for ordinary watercourse consent with some key modifications, including cost recovery for the LLFA (as opposed to the flat fee for ordinary watercourse consent, currently set at £50). The Scheme crosses a number of ditches and other ordinary watercourses for which ordinary watercourse consent would be required. The inclusion of protective provisions enables greater resourcing of the LLFA for the necessary scrutiny of relevant works to or near ordinary watercourses. The disapplication is made under s120(5)(a), with alternative provision made in the Order (via the protective provisions). (b) section 32 (variation of awards) of the Land Drainage Act 1991. This section deals with awards made under public and local Acts

ExQ	Respondent	Question	Applicant's Response
		provision constitutes a matter for which provision may be made in the DCO. Can the applicant advise if any (and if so which) of the provisions that it is seeking to disapply would be to facilitate PPW, rather than just construction of the proposed development? Pursuant to s150 of the Planning Act 2008, a DCO may include disapplication provisions only if the relevant body has consented to the inclusion of the provision. You state in paragraph 4.2.16 of the EM that consents are being sought under this section and that this process is detailed in the Consents and Agreements Position Statement. You are requested to refer to such evidence in the Consents and Agreements Position Statement [APP-272] and update the Land Rights Tracker accordingly when consents are confirmed. A final Consents and Agreements Position Statement is required at Deadline 7 of the examination timetable. Where consent is not obtained from relevant body having the power disapplied, what are	which affect land drainage. The consent of the LLFA is not required to disapply section 32. The disapplication is required so that it is not necessary to make an application to the Secretary of State to carry out works that may affect drainage that has been historically awarded under a public or local Act. Disapplying this section ensures that there is no impediment to the implementation of the Scheme arising from historical drainage acts and enables the LLFA to approve works without the need to make a reference to the Secretary of State to revoke, vary or amend the historical drainage provision. The disapplication is made under s120(5)(a) of the Planning Act 2008, with alternative provision made in the Order (via the protective provisions). (c) The provisions of byelaws made under section 66 (powers to make byelaws) of the Land Drainage Act 1991 (Ref 15). This section enables internal drainage boards and LLFAs to make byelaws to secure the efficient working of drainage systems, regulate effects on the

ExQ	Respondent	Question	Applicant's Response
		the implications for the proposed development?	environment, secure effective flood risk management, or secure the effectiveness of flooding or coastal erosion measures. The byelaws regulate the use of watercourses and prevent obstructions to watercourses. Accordingly, the disapplication of the byelaws provides clarity that any works to ordinary watercourses will be lawful if carried out pursuant to a consent under the protective provisions for drainage authorities, notwithstanding that the approved works may conflict with a byelaw. The disapplication is made under s120(5)(a) of the Planning Act 2008, with alternative provision made in the Order (via the protective provisions). (d) the provisions of byelaws made under, or having effect as if made under, paragraphs 5, 6 or 6A of Schedule 25 (byelaw making powers of the appropriate agency) to the Water Resources Act 1991 (Ref 16). Paragraphs 5, 6 and 6A provide for the Environment Agency (EA) to make byelaws for flood defence and drainage purposes, fisheries

ExQ	Respondent	Question	Applicant's Response
			functions, and marine or aquatic environmental purposes respectively. To the extent such byelaws provide for consents to be required, the disapplication of those provisions can only be done with the agreement of the EA under s150 of the Planning Act 2008. The Applicant has included protective provisions for the EA at Part 7 of Schedule 15 to the **draft DCO [REP1-007]**. These protective provisions make effective alternative provision to any such byelaws, and the disapplication is therefore made under s120(5)(a) of the Planning Act 2008. The protective provisions have been updated in the **draft Development Consent Order** submitted at Deadline 3 to the EA's standard form and agreement to this disapplication is anticipated. (e) Regulation 12 (requirement for an environmental permit) of the Environmental Permitting (England and Wales) Regulations 2016 in respect of flood risk activity only (Ref 17).

ExQ	Respondent	Question	Applicant's Response
			Regulation 12 of the Environmental Permitting Regulations requires an environmental permit for certain activities, including flood risk activities. The proposed disapplication relates to the requirement for flood risk activity permits only. The Applicant has included protective provisions for the EA at Part 7 of Schedule 15 to the **[REP1-007]**. These protective provisions make effective alternative provision to flood risk activity permits, and the disapplication is therefore made under s120(5)(a). The protective provisions have been updated in the **draft Development Consent Order** submitted at Deadline 3to the EA's standard form and agreement to this disapplication is anticipated. (f) the legislation in Schedule 3 insofar as the provisions are still in force and incompatible with the powers contained within the Order. Schedule 3 lists Acts of local effect that the Applicant believes are or may be still in force and contain provisions which could conflict with the powers in the DCO so as to create an

ExQ	Respondent	Question	Applicant's Response
			impediment to the delivery of the Scheme. Acts of Parliament are primary legislation whilst a DCO is secondary legislation. Accordingly, in the event of a conflict between the provisions of a local Act and the provisions of the DCO, the Act would have priority. Accordingly, to give full effect to the provisions of the DCO, the Acts in Schedule 3 are disapplied insofar as the provisions are still in force and incompatible with the powers in the DCO. Protective provisions are included within the draft DCO for railway entities at Part 6, and for water undertakers in Part 1, of Schedule 15. These provide appropriate protection for the relevant undertakings in the event of interaction with the Scheme, notwithstanding the disapplication. 2) The disapplication of the provisions is not intended to facilitate the permitted preliminary works. Rather, the intention behind the disapplications is to ensure that the Order includes as many consents as possible, consistent with the intention that development consent provides a 'one stop shop' for all consents required for a project. To the extent

ExQ	Respondent	Question	Applicant's Response
			permitted preliminary works may encroach upon the matters covered by the disapplied legislation (though the Applicant considers that this is extremely unlikely given the very limited scope of the permitted preliminary works) the alternative regulatory regimes found in the protective provisions (primarily for the LLFA and EA) would continue to apply. Accordingly, these disapplications should not be considered as a mechanism that enables the permitted preliminary works, but a mechanism that assists the Scheme to be implemented without impediment. 3) The Applicant notes the ExA's request. The Applicant would typically seek to confirm the consent to disapply s150 consents within the Statement of Common Ground with the relevant party. The Consents and Agreements Position Statement will be updated by Deadline 7 to confirm the consent to disapplication and to cross-refer to the relevant SoCG.

ExQ	Respondent	Question	Applicant's Response
			4) If consent to the disapplication of the relevant s150 consents is not agreed, the implications will be as follows: (a) Ordinary watercourse consent would be required to be obtained separately from the LLFA for all relevant works. The LLFA would receive only £50 for each application, and the LLFA would have a fixed period of two months to determine the application. If it did not do so, the consent would be deemed granted. It is unlikely that there would be a material impediment to the implementation of the Scheme; however the level of scrutiny by the LLFA is likely to be reduced due to the fixed fee and the absence of any mechanism to extend review timescales or request further information in respect of an application. (d) Only the byelaws made under paragraphs 5 or 6 of Schedule 25 to the Water Resources Act 1991 are s150 consents. These are byelaws for flood defence and drainage purposes and byelaws for the purposes of fisheries functions. These byelaws are made pursuant to section 210 of the Water Resources Act 1991 (Ref 16) and are made for

ExQ	Respondent	Question	Applicant's Response
			purposes "connected with the carrying out of [the EA's] functions". If the EA does not agree to the disapplication of these byelaws, the Applicant would need to comply with these, save to the extent agreed otherwise with the EA. Depending on the exact byelaws, this could lead to delays or increased complexity in the delivery of the Scheme. It is noted that the protective provisions for the EA provide effective oversight, replicating the control achieved through byelaws in a way that can be tailored to the activities proposed as part of the Scheme. (e) If the EA does not consent to the disapplication of the requirement to obtain flood risk activity permits, the Applicant would be required to obtain such a permit in relation to works near to main rivers, including crossing the River Avon. The application would be made under the Permitting Regulations, either under an exemption, a standard rules permit, or a bespoke permit. The availability of each option

ExQ	Respondent	Question	Applicant's Response
			depends on the precise nature of each flood risk activity. Where a bespoke permit is required, the EA will typically consult on that permit. This consultation can effectively duplicate the matters being heard during the Examination. The EA advise that it usually takes 2-4 months to get a decision about the permit application. Each application must be accompanied by the relevant fee. This process can be more time consuming than the use of protective provisions, which implement the key regulatory oversight from the permitting regime, through plan approval. The protective provisions provide for a decision to be made by the EA within 2 months; and, if not made, the decision is deemed refused meaning it can be referred to the Secretary of State for determination. If the requirement for flood risk activity permits is not disapplied, the main risk is therefore one of delays to the implementation of the Scheme associated with the need to obtain the permits separately.

ExQ	Respondent	Question	Applicant's Response
			It is noted that the EA is comfortable that protective provisions provide a suitable alternative to obtaining flood risk activity permits, with the inclusion of its standard protective provisions within the DCO. The Applicant has updated the protective provisions to the EA's standard form at Deadline 3 and anticipates the EA's consent to the disapplication of these requirements imminently.
DCO1.11	The Applicant	**Article 7 – Defence to proceedings in respect of statutory nuisance Q1** Article 7 provides that no person is able to bring statutory nuisance proceedings under the Environmental Protection Act 1990 in respect of noise. Paragraph 4.2.21 of the EM [REP1-009] sets out that there is no statutory nuisance expected as a result of the authorised development. Given that statement, can Article 7 be deleted from the dDCO? If not, explain why not.	Section 158 of the Planning Act 2008 confers statutory authority for the carrying out of development or doing anything else authorised by the Order (Ref 5). This acts as a defence in any criminal or civil proceedings for nuisance in the absence of any contrary provision in the Order. Section 152 then provides that where the defence of statutory authority provided by section 158 applies, the person affected by that nuisance may only claim compensation. Taken together, the effect is to convert a person's claim for an injunction to stop noise-making activity into one for compensation.

ExQ	Respondent	Question	Applicant's Response
		If the applicant considers that Article 7 is still needed, should noise coming from the site be managed through the Requirements?	The effect of article 7 is to limit the scope of section 158, so that the statutory authority is only available in the circumstances described in paragraph (2). Accordingly, the Applicant notes that the removal of article 7 would be to remove a limitation on the statutory defence to nuisance otherwise conferred by the Planning Act 2008. As noted by the ExA, nuisance from noise is not anticipated from the Scheme, and is not required to be managed through the Requirements. It is therefore very unlikely that the Applicant would need to rely upon the statutory defence conferred by section 158 of the Planning Act. However, should such a circumstance arise, it is considered appropriate that the statutory defence should be limited to only the circumstances listed in article 7(1).
DCO1.12	The Applicant	**Article 7 – Defence to proceedings in respect of statutory nuisance Q2**	1) The Applicant notes this. The footnote has been updated to refer only to the amendment made to section 61(9) of the Control of Pollution Act 1974 in the **draft DCO** submitted at Deadline 3.

ExQ	Respondent	Question	Applicant's Response
		If Article 7 is to be retained, the applicant is requested to review some of the wording in this article, as follows: Article 7(1)(a) refers to '*… the Control of Pollution Act 1974(**a**)*.' Footnote (**a**) states: '*1974 c. 40. Sections 61(9) and 65(8) were amended by section 162 of, and paragraph 15 of Schedule 3 to, the Environmental Protection Act 1990 (c. 25). There are other amendments to the 1974 Act which are not relevant to the Order*.' The ExA note that s65 of the Control of Pollution Act 1974 has been repealed. The applicant should refer to extant legislation only. Please review the footnote. Article 7(1)(c) states that '*the nuisance is a consequence of the use of the authorised development and that it cannot be reasonably avoided.'* The ExA suggests deletion of the underlined words, as they are a repeat of the leading words in the primary paragraph of Article 7(1).	2) The Applicant agrees and has made this change in the **draft DCO** submitted at Deadline 3. 3) The text in brackets serves the purpose of identifying and explaining the purpose of the referenced legislation. In the ExA's suggested drafting, the text in brackets is simply the heading for section 61 of the Control of Pollution Act 1974 and does not enable the reader to understand the effect of subsection (9) without cross-referring directly to that provision (Ref 18). Accordingly, the Applicant considers that the extant drafting is to be preferred as the resulting provision is clearer as to its effect.

ExQ	Respondent	Question	Applicant's Response
		Article 7(2) contains superfluous words. The ExA suggests simplified revised drafting as follows: *Section 61(9) (prior consent for work on construction sites) of the Control of Pollution Act 1974 does not apply where the consent relates to the use of the premises by the undertaker for purposes of, or in connection with, the construction, maintenance or decommissioning of the authorised development.*	
DCO1.13	The Applicant Wiltshire Council South Gloucestershire Council	**Article 9 – Application of Highway Authority Permit Schemes** Article 9(2)(a) provides that conditions attached to a permit cannot amount to a moratoria. A moratoria under sections 58 and 58A of the New Roads and Street Works Act 1991 is where the highways authority can prohibit further road works to the street following 'substantial road works' by providing notice to stakeholders. The EM sets out that the intention of this is 'ensuring that the permit schemes are not an impediment to the delivery of the authorised development'.	1) Provisions to manage the interaction of a project with street works permit schemes can be found in section 9 of the Tillbridge Solar Order 2026, the Fenwick Solar Farm Order 2026, and the Springwell Solar Farm Order 2026. It should be noted that they were not typically included in earlier made DCOs as permitting schemes were not routinely in place. They can also be found in the draft DCOs for the Droves Solar Farm (EN0110013), Rosefield Solar Farm (EN010158), Green Hill Solar Farm (EN010170) and One Earth Solar Farm (EN010159).

ExQ	Respondent	Question	Applicant's Response
		The Applicant: Explain What precedent(s) exist for this type of power benefitting the undertaker. If this aim could still be achieved if the powers were limited to use only on certain roads / prior to the date of final commissioning / during decommissioning. Why the applicant needs to apply the appeal process in Schedule 16 of the dDCO, given the imposition of Article 9(2)(b), which already states that a permit may not be granted subject to conditions where compliance with those conditions would constitute a breach of this Order or where the undertaker would be unable to comply with those conditions pursuant to the powers conferred by this Order. The Councils: The ExA would welcome the views of the Councils with regard to how they think this Article would work in practice in its currently drafted form, and whether the ExA's alternative	2) The Applicant is not clear on how such a restriction is proposed to operate as an effective restraint, noting that save for this limited restriction on the permitting authority's discretion, the Applicant is proposing to fully comply with the permit schemes when carrying out street works under the Order. The article operates in a very limited way to modify the application of the permit scheme such that it cannot be used in a manner that would impede delivery of the Scheme. It applies generally in recognition that all street works for the Scheme will require a permit, but it is not known at this time what other works may be being carried out by third parties (if any) that might enable a highway authority to prohibit the works associated with the Scheme on the basis that there have been prior substantial road works. Any restriction as to the timing or geographical application of this limited restriction, risks the restriction not being available when needed, with the consequence that a moratorium could be imposed delaying delivery of the Scheme. 3) The appeal mechanism exists to deal with a scenario where a permit is granted subject to

ExQ	Respondent	Question	Applicant's Response
		suggestion of restricting the power to use only on certain roads / prior to the date of final commissioning / during decommissioning would be a more suitable outcome.	conditions that the Applicant considers imposes a moratoria or would require a breach of the Order to comply with, but where this is disputed by the highway authority.
DCO1.14	The Applicant	**Article 10 - Power to alter layout, etc., of streets** The power in Article 10 authorises alteration etc. of any street within and beyond the Order limits. The EM [REP1-009] does not explain why both the specific and the general power are needed, and reliance on the use of the same provisions in other DCOs is not sufficient justification. The applicant is required to explain why it requires power to alter any street, including ones outside the Order limits, rather than just those streets identified in the relevant schedules (for example Schedule 4 (streets subject to street works)/ Article 8; Schedule 5 (alteration of streets) / Articles 10 and 11; and Schedule 7 (access to works) / Article 14)? Although there is a requirement to obtain the street authority's consent in Article 10(4), the ExA note that this is subject to the provisions in	1) The article provides general power to alter the layout of streets in recognition that, as the detailed design develops, there is potential for works to the highways to be identified as necessary that were not previously known. In such a circumstance, the works may be carried out pursuant to the powers in the Order (rather than needing to rely on provisions of the Highways Act 1980 etc. (Ref 19)), provided always that the consent of the street authority (which, in respect of public highways, will be the local highway authority) is obtained. This general power ensures that unforeseen highway works can be carried out with the agreement of the local highway authority, and avoiding the fragmentation of the powers under which such works are carried out. The article also makes specific provision for the works listed in Schedule 5 to be carried out. These are the known works to highways and private streets required to facilitate the

ExQ	Respondent	Question	Applicant's Response
		Article 47 (Procedure in relation to certain approvals etc.), and the deemed consent provision if the consent application is not determined in 6 weeks. The applicant is required to justify the applicability of a deemed consent provision in this instance.	Scheme. It is considered appropriate that no further approval of these works under the Highways Act 1980 is required as the DCO process enables the examination of the proposed works (Ref 19). However, the highway authority will still be involved in the approval of the detailed design of any highways works contained in the Construction Traffic Management Plan as a result of being a consultee to Requirement 15. 2) Deemed consent is considered appropriate for the majority of consents required for the Scheme. This is to ensure that the requirement for a consent (that must not, in any event, be unreasonably withheld or delayed) does not lead to undue delay in implementing the Scheme. Deemed consent would only apply in the event that the consenting authority failed to take any action. It does not prevent the consenting authority from refusing consent. Were such consents subject to deemed refusal, a consenting party could delay delivery of the Scheme by refusing to respond to any request for consent. Article 47 does not currently include reference to an appeal

ExQ	Respondent	Question	Applicant's Response
			process to resolve any refusal; instead, the intention is that such disputes would be determined by arbitration under article 44. However, an arbitration process would not be appropriate where the consenting party is not engaging with the application for consent. Were deemed refusal provided, a separate appeal mechanism, akin to that found in Schedule 16, would need to be included in the draft DCO so that the request for consent could be appropriately determined. Such a process may take considerable time to complete, as well as being costly, and therefore is contrary to the critical national priority need for the Scheme. Deemed consent is therefore considered appropriate, save where there are clear reasons to the contrary – for example, if the proposed discharge of a Requirement is accompanied by a statement that the application will give rise to materially new or materially different environmental effects (see Schedule 16, paragraph 2(5)). It is also noted that the timeframe for the consent may be extended by agreement, allowing for circumstances where the

ExQ	Respondent	Question	Applicant's Response
			consenting authority is genuinely considering the application but requires additional time to do so. It is considered that this strikes a proportionate balance between the potential for a consenting authority to require longer than six weeks to consider an application with the risk of impediment to the delivery of the Scheme.
DCO1.15	The Applicant Wiltshire Council South Gloucestershire Council	**Article 11 - Construction and maintenance of altered streets** The Applicant: As construction is set to last at least 2 years, does Article 11(1)(b)(ii) mean that a street altered in the early construction phase would need to be maintained at the Council's expense for the second year of the construction period and thereafter? On the basis that some (if not all) of the altered streets would continue to be used by construction vehicles for the duration of the construction period (and indeed during the maintenance period), is it not feasible that there is potential for damage or degradation of those streets to occur as a result of	Article 11(1)(b) provides that, following an alteration to a street, the Applicant must maintain the street for 12 months. This 12-month period runs from completion of the alteration work in question and is not connected to the wider construction phase of the Scheme. At the expiry of 12 months, responsibility for maintenance reverts to the street authority. This approach reflects the typical sharing of responsibility for highway works, where the developer carries out highway works and is then issued a provisional certificate that confirms the works have met the standards expected by the highway authority. The developer continues to maintain the street for 12 months, after which a final certificate is

ExQ	Respondent	Question	Applicant's Response
		construction vehicle usage beyond the period of 12 months from the date the alteration of that street is completed? In that regard the timing of the Council becoming liable for the maintenance and expense of such streets as imposed by Article 11(1)(b)(ii) is required to be justified. The Councils: Please comment on whether it would be more reasonable to amend Article 11(1)(b)(i) to require the undertaker to maintain the streets it alters for the entire duration of the construction period and for a subsequent 12 months before the Council becomes responsible for ongoing maintenance.	issued. This period enables defects that could not be identified through an inspection to come to light and be rectified by the developer. It is not considered necessary to alter the timescales in article 11(1)(b) for two reasons. First, the timescales may be changed by agreement with the street authority. This allows for a longer maintenance period to be agreed, if appropriate. Secondly, the **Outline CTMP [REP1-096]** provides for road condition surveys to be carried out before construction commences, at 6-month intervals, and on completion of the construction of the Scheme. These will identify any highways defects attributable to the construction of the Scheme, which must be repaired to the satisfaction of the highway authority. Any deterioration of the altered highway would be assessed as against its condition on completion of the alteration works (inspection being implicit in the works being to the reasonable satisfaction of the street authority under article 11(1)(a)); and further

ExQ	Respondent	Question	Applicant's Response
			recorded and rectified pursuant to the measures in the **Outline CTMP [REP1-096]**. In light of this, the Council would not become liable for the cost of any repairs to the highway arising from construction of the Scheme. It is noted that the Applicant is currently negotiating protective provisions with the Council relating to highways works.
DCO1.16	The Applicant	**Article 12 - Temporary closure, restriction or prohibition of use of streets and public rights of way Q1** Article 12(1)(b) authorises the use of motor vehicles on public rights of way (PRoW) and Article 12(1)(c) authorises excluding all pedestrians '*for any reasonable time*'. The ExA note that the EM [REP1-009] at paragraph 4.3.8 explains the need for motor vehicles on PRoW, but it does not cover 12(1)(c). The applicant is requested to update the EM to justify the inclusion of Article 12(1)(c). The applicant is also requested to explain what it means by the words 'for any reasonable time' in Article 12(1), as those words are not	Article 12(1)(c) provides the Applicant with a power to prevent persons from passing along the street or public right of way. This is, in essence, the power to stop people from using the street or public right of way during the period of temporary closure. This power is subject to paragraph (2), which restricts the extent of any closure. The Applicant must provide reasonable access to pedestrians going to and from premises where, if they were unable to use the street or public right of way that is temporarily closed, they would have no other way of accessing the premises.

ExQ	Respondent	Question	Applicant's Response
		defined or qualified. Should the drafting be changed to limit this power?	The power to stop persons using a street or public right of way is consistent with a temporary closure. The requirement to maintain access to premises reflects the obligation that would arise were the temporary closure to be carried out under wider highways law. What is considered a reasonable time for the closure will depend on the circumstances of that closure and any relevant health and safety requirements. The use of 'reasonable time' ensures that the closure cannot be for longer than is actually necessary to achieve the purposes of the closure. What is 'reasonable' in the circumstances will be controlled by the detailed Construction Traffic Management Plan (in respect of highways) and the detailed Public Rights of Way and Permissive Paths Management Plan. Please see section 2.4 of the **Outline CTMP [REP1-096]** in relation to potential traffic management associated with any required highway closures; and paragraph 3.2.4 of the **Outline Public Rights of Way and Permissive Paths Management Plan (PRoWPPMP) [REP-104]** which confirms that

ExQ	Respondent	Question	Applicant's Response
			any temporary closure of a PRoW that cannot be avoided will only be put in place for as long as is reasonably necessary. The detail of any closures will be set out in the detailed management plans, which must be approved by the relevant planning authority. Appropriate oversight of the extent and duration of any temporary closures under article 12 is therefore secured.
DCO1.17	The Applicant	**Article 12 - Temporary closure, restriction or prohibition of use of streets and public rights of way Q2** Article 12(2) provides that the undertaker must '*provide reasonable access for pedestrians going to or from premises abutting a street or public right of way affected by the temporary alteration, diversion, prohibition or, restriction, of a street or public right of way under this article if there would otherwise be no such access.'* The ExA queries why this provision (where it relates to PRoW) is confined to pedestrians only and not other users of PRoW, noting that	1) The restriction in article 12(2) mirrors section 14 of the Road Traffic Regulation Act 1984 (RTRA 1984, Ref 20). That section provides that a traffic regulation order may be made to restrict or prohibit use of a road where works are being or are proposed to be executed on or near the road. The restriction may restrict or prohibit the use by vehicles, vehicles of any class, or by pedestrians. However, sub-section (4) confirms that such a restriction must not be made "with respect to any road which would have the effect of preventing at any time access for pedestrians to any premises situated on or adjacent to the road, or to any other premises accessible for pedestrians from, and only from, the road."

ExQ	Respondent	Question	Applicant's Response
		some PRoW are also open to cyclists and horse riders? The ExA also queries what provisions are in place for people who require vehicular access to/ from a street where there would otherwise be no such access?	Accordingly, the power under the DCO must be exercised in the same way as the equivalent restriction issued under the RTRA 1984. The requirement for access is limited to pedestrians who must utilise the road (or, as the case may be, the PRoW) to access a premises where no alternative route exists. The temporary closure will be taking place to facilitate the construction of works on or near the road or PRoW, it is therefore appropriate that any exceptions whereby members of the public or other non-motorised users may nevertheless utilise the road (which will be within a construction site) are kept to a minimum. 2) As noted above, pedestrian access to premises must be maintained during any period of closure, where no alternative access is possible. Consistent with the RTRA 1984, no provision must be made for vehicular access. This reflects that the road closure relates to works on or near the road, where it is not possible to complete the works without closing the road. In these circumstances, it is not

ExQ	Respondent	Question	Applicant's Response
			appropriate to maintain vehicular use of the road. However, it should be noted that the detail of any road closures will be included within the detailed CTMP, and will therefore need to be approved by the relevant planning authority in consultation with the relevant highway authority under Requirement 15 in Schedule 2 to the **draft DCO [REP1-007]**. Any such road closure would, in practice, operate as though it were put in place pursuant to the RTRA 1984 which is considered appropriate.
DCO1.18	The Applicant	**Article 12 - Temporary closure, restriction or prohibition of use of streets and public rights of way Q3** Notwithstanding any other precedents, provide justification to demonstrate why the power in Article 12(6) is appropriate and proportionate having regard to the impacts on pedestrians and others of authorising temporary working sites in these streets and PRoW.	Paragraph (6) provides that the Applicant may use any temporarily closed street or PRoW as a temporary working site. This provides clarity that the Applicant may carry out the necessary works for which the temporary closure has been affected, without such activity being contrary to the closure itself. This clarification is required, noting that the reason for temporary closures of streets and PRoW is most likely to occur where these are crossed by the electrical cables (Work No. 1(d) or 5) using open trench methods.

ExQ	Respondent	Question	Applicant's Response
DCO1.19	The Applicant	**Article 13 - Use of private roads** The ExA is concerned about the broad power to use any private road within the Order limits (and not just those parcels of land known to be subject to CA where landowners have been informed in advance of the rights to be acquired). The EM [REP1-009] at paragraph 4.3.10 states that the Article creates a power to 'use' a private road for a temporary period that is proportionate to the limited nature of the use. However, there is no explanation of why the private roads cannot be identified and controlled by a Schedule, and nothing restricts the time period of use. Can the applicant identify the locations of where this Article may apply? Does the Article also need to include an advance notice period to private road owners and users? Article 13(3) seems only to cover compensation for road damage, and not disruption to private use. Why is that?	Article 13 provides a power to use private roads within the Order Limits without needing to acquire permanent rights to do so. This is particularly important along the cable route corridor, where it may be inappropriate to take exclusive temporary possession of private streets that continue to be in use to facilitate construction. Permanent rights would also be excessive where access along the private street is required only temporarily for the purposes of construction. 1) It is not considered necessary to list all private roads to which this power applies as it is all private roads within the Order Limits, and all land within the Order Limits (save within the Melksham substation) is subject to powers of compulsory acquisition of temporary possession. Accordingly, all landowners that are potentially affected by this power will be listed in the Book of Reference and already be aware of the Scheme and the potential for greater interactions pursuant to these compulsory acquisition and temporary possession powers.

ExQ	Respondent	Question	Applicant's Response
			2) Article 13 provides a power to use private roads, in common with the existing users, thereby avoiding disruption to private use. It is not considered necessary for prior notice to be mandated in these circumstances due to there being little to no impact on the landowners from the use. It should also be noted that the use of the private road will be incidental to the carrying out of more significant works that would require, absent an agreement, the use of temporary possession and compulsory acquisition powers. 3) Compensation is provided for road damage only in recognition of the limited scope of this power, and that if more than simple use of the road is needed, other powers in the DCO would be engaged. For example, to the extent exclusive possession is required, compensation for the interference caused would be available under article 31 (temporary use of land for constructing the authorised development). The voluntary agreements being negotiated with landowners require the Applicant to repair any damage caused to private roads as a

ExQ	Respondent	Question	Applicant's Response
			result of the Scheme and restore any private roads to their pre-construction condition once the access licence has been terminated. The power under article 13 will only be exercised where a voluntary agreement has not been possible. The Applicant considers that compensation is an appropriate remedy in that scenario.
DCO1.20	Wiltshire Council South Gloucestershire Council	**Article 16 - Traffic regulation measures** <u>The Applicant:</u> Can the applicant explain why this Article appears to apply to any road within and outwith the Order limits? <u>The Councils</u>: Before exercising the power of Article 16(1), which relates to matters such as varying traffic speed, stopping/ waiting/ loading restrictions, restricting the use of a road and so on, Article 16(5)(b) requires the undertaker to publish its intention to make the provision not less than 7 days beforehand in one or more newspapers circulating in the area in which any road to which the provision relates is situated.	Traffic regulation measures may need to be put in place beyond the Order Limits, where it is necessary to maintain the safe operation of the highway network. The power to make traffic regulation measures is included within the Order to avoid the limitations for temporary traffic regulation orders (TTRO) made under the RTRA 1984, which may be made for limited purposes and for a maximum of 18 months. The power to make traffic regulation measures for the purposes of the construction, maintenance and decommissioning of the authorised development ensures that all necessary traffic management can be put in place, even if its

ExQ	Respondent	Question	Applicant's Response
		The Councils are asked to advise whether the minimum notice publication period of 7 days is sufficient, and whether the notice needs to be extended to digital publication and/or on-site notification?	purposes would not meet the requirements for a TTRO to be issued by the traffic authority. It should also be noted that the detailed CTMP will include the proposals for traffic regulation measures for approval by the relevant planning authority in consultation with the relevant highway authority. Please see section 2.4 of the **Outline CTMP [REP1-096]**.
DCO1.21	The Applicant	**Article 17 – Discharge of water** Please advise if there is a need to insert an additional provision into this Article to refer to the Schedule 15 (protective provisions) and Part 9 of that Schedule (drainage authorities)? The ExA refers the applicant to Article 18(5) of the Springwell Solar Farm Order 2026 by way of example of the additional provision that is seemingly missing from Article 17 of the dDCO.	The Applicant has added in a new paragraph (5) into article 17 of the **draft DCO** submitted at Deadline 3 to confirm that the protective provisions for drainage authorities apply. The definition of "drainage authority" is provided within paragraph (8) of that article.
DCO1.22	The Applicant	**Article 18 – Removal of human remains** The applicant's EM [REP1-009] has referred to precedent for this Article in the A303 (Amesbury to Berwick Down) Development Consent Order 2023 and the Cottam Solar	First, it is important to note that article 18 is intended to deal with any human remains that are identified within the Order Limits, not simply those that were interred less than 100 years ago. This is because the provisions of the Burial Act 1857 applies to any burial

ExQ	Respondent	Question	Applicant's Response
		Project Order 2024. Nonetheless, in more recent Orders, for example the Mona Offshore Wind Farm Order 2025 and the Springwell Solar Farm Order 2026, the SoS has removed similar articles which would have allowed the Applicant to remove and rebury modern (<100-year-old) remains, on the basis that this provision is to be used only for, and limited to, known and named burial grounds and which contain human remains that are identifiable. The applicant is therefore required to confirm if there are any burial grounds on the site that are known to have been used in the past 100 years, that would justify retention of Article 18?	ground, irrespective of age, and irrespective of whether it is consecrated. This article has precedent in the A303 (Amesbury to Berwick Down) Development Consent Order 2023, in the context of extensive historical burial grounds in the vicinity of Stonehenge and appears in DCOs for solar projects where the potential for human remains has been identified, as in the case of the Scheme, through archaeological surveys of the Order Limits. Article 18 has been included because there is a risk of human remains associated within the Order Limits identified by the undertaker in the course of its archaeological investigations (these findings are summarised in the **Outline Archaeological Mitigation Strategy (AMS) [APP-230]** and include a burial site in Field D24). The **Outline AMS [APP-230]** also provides the proposed archaeological mitigation in respect of each area where burial features have been identified). The undertaker is not able to rule out the presence of human remains within the Order Limits at this stage in the process. This provision is considered

ExQ	Respondent	Question	Applicant's Response
			necessary so that the discovery of any remains does not delay the implementation of the Scheme. The article operates by permitting the undertaker to remove human remains that were interred *more than* 100 years ago and where no personal representative or relative is likely to object, before seeking instructions from the Secretary of State as to the reinterment of the remains. For any remains interred less than 100 years ago, the process for publishing notices and according with the wishes of the deceased personal representative or relatives is set out in the article. In the absence of this article, where human remains are identified, the Applicant would need to comply with section 25 of the Burial Act 1857. In practice, this means that construction activity in the area where remains have been identified must stop whilst the Applicant applies to the Secretary of State for instructions for the removal of the human remains and subsequent reinterment. It is considered preferable for the Secretary of

ExQ	Respondent	Question	Applicant's Response
			State to include instructions as to the removal of any identified human remains within the DCO in order that such a discovery does not delay the implementation of the Scheme. This is considered appropriate as the AMS makes detailed provision for the treatment of archaeological remains. In the event human remains are not archaeological in nature, the Applicant will be able to commence the process of advertising for the deceased personal representatives or relatives without delay. The Scheme is critical national priority infrastructure and Article 18 ensures that the discovery of a historic burial can be dealt with appropriately and efficiently, in accordance with the AMS.
DCO1.23	The Applicant	**Article 19 - Protective works to buildings** Have any (and how many if so) properties been identified that might fall into the remit of this Article? Can the applicant define the term 'emergency' in Article 19(5)?	1) The Applicant has not identified any properties where it is known, at this stage, that protective works will be required. The Scheme has been designed to avoid potential interactions that could lead to protective works being required, however this cannot be ruled out, noting that new development may come

ExQ	Respondent	Question	Applicant's Response
		Does a definition of emergency need to be included in Article 2(1) (Interpretation)? Would anything in this Article give a defence to offences committed against the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990? Are the notice periods in Article 19(5) (14 days to serve on owners and occupiers) and Article 19(6) (10 days for owners to serve counter-notice) acceptable? Please justify these time limits.	forward before the construction of the Scheme is completed that is affected. 2) Emergency has its natural definition, i.e. a sudden, unexpected, and dangerous situation that poses an immediate threat to life, health, property, or the environment. 3) The Applicant does not consider it necessary to provide a bespoke definition of emergency for this Article and does not consider that any expansion or alteration of the word's natural meaning is needed that would require a definition to be included in the Order. 4) The Applicant understands this concern. The Applicant notes that section 33 of the Planning Act 2008 provides that, to the extent development consent is required for development, the consents listed are not required. That list includes consents under the Planning (Listed Buildings and Conservation Areas) Act 1990 (Ref 21). Schedule 1 provides development consent for, amongst other things, works for the protection of buildings and land (see paragraph (n) in the list of further associated development). The carrying

ExQ	Respondent	Question	Applicant's Response
			out of such protective works in accordance with article 19 is therefore included within the ambit of section 33. Accordingly, no offence would be committed under the Listed Buildings Act through works undertaken pursuant to this article. The Applicant understands that bespoke drafting was included in the equivalent article in the Lower Thames Crossing DCO in the event protective works were required to listed buildings; however, the nature of that project is significantly different to the Scheme, and being a road and tunnelling project there is a much greater risk of the undertaker needing to rely upon that article. This can be seen in the broader scope of the article in the LTC DCO, which applies not only to buildings but authorises protective works to land without buildings. In the case of the Scheme, the design has been carried out to avoid direct impacts to listed buildings, and it is not anticipated that protective works to any building will be required. Accordingly, it is not considered necessary for provision to be made for this.

ExQ	Respondent	Question	Applicant's Response
			5) The period of 14 days is considered appropriate, noting that this article provides for works to protect properties from harm. A longer timescale would delay how quickly the Applicant could get on site to carry out surveys and carry out protective works, with the risk of damage worsening in that timescale increasing with the duration. The timescale for an owner or occupier to serve notice disputing that protective works are required necessarily must have a shorter timescale as it needs to have effect before the Applicant is on site.
DCO1.24	The Applicant	**Article 37 - Consent to transfer the benefit of the Order** Because Article 37 is drafted so as to allow any transfer of benefit by the applicant (undertaker) to any other named person or category of person without the need for the SoS's consent, the applicant should provide full justification as to why a transfer to such persons is appropriate. Article 37(2) requires such approval but 37(3) provides narrow circumstances where this approval is not needed.	1) Article 37 provides a general power of the undertaker to transfer or grant the benefit of the provisions of the Order to another person. That power is subject to the controls within article 37. The primary control is in paragraph (3) which requires the consent of the Secretary of State to the transfer or grant except in the limited circumstances listed. Those circumstances are: - *where the transferee or lessee is the holder of a licence under the Electricity Act 1989*. It is not considered that prior consent is required as another licence holder will be subject to the

ExQ	Respondent	Question	Applicant's Response
		Confirm if Article 37 seeks to permit transfer of CA powers and if so, what provisions are required to ensure that the transferee has sufficient funds to meet the compensation costs of acquisition? Should the Article be amended so that such evidence is required under articles 37(3) and (4)? Confirm why Work No. 9 is carved out in Article 37(3)(b) where the transfer is to a holding company or subsidiary of the undertaker.	same regulatory oversight for the purposes of the generating station (constituting the authorised development) as the Applicant. In view of the continued regulatory oversight, it is not considered that there is any risk that would be controlled through the requirement for prior consent from the Secretary of State. - *where the transfer or grant is in respect of Work No. 9, and the recipient is a company in the same group as the Applicant*. Work No. 9 is the habitat management areas, and there is no risk associated with the transfer of this Work No., unlike those parts of the Scheme that are involved in the generation and transfer of electricity, and prior consent from the Secretary of State is not considered necessary to manage a risk. - *where the time limits for compulsory acquisition of land have elapsed and there no longer exists any potential viable claim in relation to compulsory acquisition powers*. This reflects that the grant of compulsory acquisition powers is made following consideration of, amongst other things, the Applicant's ability to provide compensation for

ExQ	Respondent	Question	Applicant's Response
			the use of those powers. Once the powers can no longer be utilised, the risk of compensation claims not being paid falls away and does not need to be controlled by prior consent to a transfer by the Secretary of State. It is noted that article 37(2) does not require the approval; instead, it provides that, for the purposes of the benefit so transferred, references to the "undertaker" mean the transferee or lessee. 2) It would be possible for the benefit of the compulsory acquisition powers to be transferred under article 37. However, this would require the prior consent of the Secretary of State (as the transferred powers would not have expired such that the exception in paragraph (3)(c) could be relied on), and such powers could not be exercised until a guarantee or other appropriate security had been put in place by the transferee pursuant to article 48 (guarantees in respect of payment of compensation). The Applicant is not clear on what is meant by the "evidence [that] is required under articles

ExQ	Respondent	Question	Applicant's Response
			37(3) and (4)", as article 37(3) mandates that the consent of the Secretary of State is required save in limited, listed exceptions, and article 37(4) requires a notification to be made to the Secretary of State in the event a transfer is made without consent in reliance on the listed exemptions. If no exemption is relied upon, the Secretary of State must consent to the transfer, and will be able to require such evidence as they see fit to satisfy themselves that such a transfer is appropriate. 3) As noted above, Work No. 9 is the habitat management areas. These areas will need to be managed in order to provide the intended ecological outcomes. The Applicant is part of the Island Green Power group of companies, who have promoted a number of NSIP-scale solar projects and smaller solar farms. This provision is included so that, if required, the habitat management areas can be transferred to a separate company within the group for ongoing management.

ExQ	Respondent	Question	Applicant's Response
DCO1.25	The Applicant	**Article 39 - Planning permission, etc** The ExA note the applicant's update to the EM [REP1-009] at D1, which provides further information to justify the inclusion of this Article in the dDCO and notes reference to precedent in London Luton Airport Expansion Development Consent Order 2025 and the A122 (Lower Thames Crossing) Development Consent Order 2025. Nonetheless, equivalent provisions are not included in The Mallard Pass Solar Farm Order 2024, The Longfield Solar Farm Order 2023, The Gate Burton Energy Park Order 2024, The Cottam Solar Project Order 2024, The East Yorkshire Solar Farm Order 2025 or The Heckington Fen Solar Park Order 2025. The SoS also removed similar provisions from The Byers Gill Solar Order 2025, The Mona Offshore Wind Farm Order 2025, The Rampion 2 Offshore Wind Farm Order 2026, and The Springwell Solar Farm Order 2026 in order to ensure compliance with the Supreme Court's judgment in Hillside Parks Ltd v Snowdonia National Park.	The Applicant notes that a number of the solar DCOs identified by the ExA pre-date the decision in *Hillside*. The Applicant is aware that fundamentally different approaches appear to being taken by the Secretary of State for Transport and the Secretary of State for Energy Security and Net Zero. It is the position of the Applicant that the approach of the Secretary of State for Transport is to be preferred, noting that the inclusion of *Hillside* drafting within a DCO is fundamental to limiting the potential for unforeseen adverse effects of the grant of the DCO and construction of the authorised development. The crux of the decision in *Hillside* is that if a later planning permission is commenced that, if built out in full, would render it impossible to complete an earlier planning permission, that first planning permission is extinguished. Whilst the *Hillside* case applies to planning permissions, the principle that a permission will be extinguished if later development makes it impossible to build the full development would

ExQ	Respondent	Question	Applicant's Response
		The Applicant is therefore required to explain how the situation for Lime Down Solar Park is different to those other Orders to justify retention of Article 39 in its current drafting, or in modified drafting.	also apply where the later development is authorised by a development consent order. The purpose of *Hillside* drafting is therefore to avoid the inadvertent extinction of third-party planning permissions simply because the Scheme, if built out, would make it impossible for part of a planning permission to be built out. The Scheme involves a large amount of land, and the timescales for obtaining development consent are typically longer than for obtaining a planning permission. As such, there is potential for new planning permissions to be granted that overlap with the Order Limits. This can be seen with the proposed BESS development being promoted by Grenergy Renewables UK Limited, for which a planning application has not yet been made but which could potentially be granted before the DCO is made. The principles of *Hillside* have effect to extinguish from the moment the later planning permission is commenced. The DCO is equivalent in nature to an outline planning consent; however, unlike for an outline

ExQ	Respondent	Question	Applicant's Response
			planning permission, there is no distinction made between the Scheme authorised by the DCO and the Scheme following the detailed design process and discharge of Requirements. As such, the question of whether a planning permission is impossible to build out would need to be considered against the authorised development as consented. The reverse is not true, as the development consent is granted by statutory instrument, which remains in force, authorising the Scheme, unless and until it is revoked. The Scheme could be implemented, even if to do so would require the removal of new development. The Applicant intends to work with Grenergy in the detailed design of the Scheme so that both projects may be brought forward to support the transition to Net Zero. However, if the *Hillside* drafting were removed, commencing the Scheme would extinguish any planning permission for the Grenergy BESS as the works authorised by the DCO in the same area could make the Grenergy BESS impossible to build out. In turn, this would require Grenergy

ExQ	Respondent	Question	Applicant's Response
			to re-apply for a new planning permission or abandon their BESS project. It is clear that this outcome is not desirable and should be avoided. It is noted that the Supreme Court decision is binding. However, as with all Court judgements, it is only interpreting the legislation and its effects. It is entirely open to the Secretary of State, in making the Order, to make alternative legislative provision, including to provide for a distinct approach to considering whether a planning permission may be implemented where it is affected by a DCO. To do so helps address any lack of clarity that may now exist as to how the *Hillside* principles apply to development authorised under the Planning Act 2008, rather than the Town and Country Planning Act 1990 (Ref 5; Ref 8), providing certainty for developers where land is affected by a DCO. For these reasons, and as set out in detail in the **Explanatory Memorandum [REP1-009]**, the Applicant confirms its view is that *Hillside* drafting should become standard drafting, and that it is required in the DCO for the Scheme to

ExQ	Respondent	Question	Applicant's Response
			ensure that it does not extinguish any planning permission that the Grenergy BESS scheme may obtain in the coming months.
DCO1.26	The Applicant	**Article 40 - Felling or lopping of trees and removal of hedgerows Q1** Article 40 includes broad provisions to lop trees and shrubs anywhere '*near*' the authorised development, and not just within the order limits or encroaching the order limits. Explain what is meant by 'near'. Should Article 40(1) be updated to include the following words in **bold** *'…near* any part of the authorised development ***within the Order limits*** *or* ***encroaching upon the Order limits****, or cut back its roots …."*? Should Article 40(1) include a requirement to consult/seek agreement from Wiltshire Council for felling, lopping or removing, before it invokes the power?	1) The meaning of 'near' is ascertained through the context of the remainder of paragraph (1). In order to have the power to lop a tree or shrub, the Applicant must reasonably believe it necessary to do so because of obstruction or interference with the construction, maintenance or operation of the authorised development, is a danger to persons using the authorised development, or obstructs construction vehicles. The tree must therefore be of such proximity to the Order Limits that it is causing such an interference and would therefore only apply to trees that are effectively adjacent to the Order Limits. 2) The Applicant does not consider the proposed drafting to be necessary and could potentially be insufficient to protect the Scheme. For example, a tree could become damaged such that it is liable to fall towards the authorised development, presenting a danger to persons using the authorised development; however, that tree could, until it

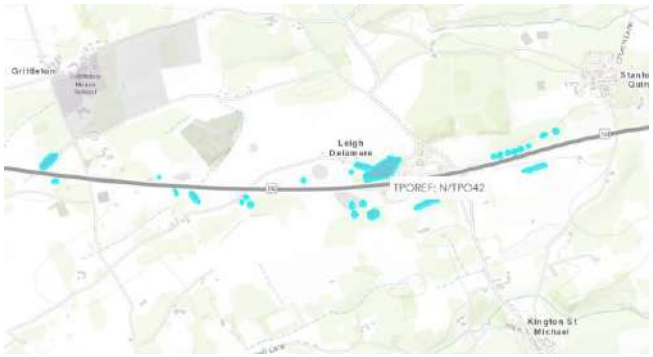
ExQ	Respondent	Question	Applicant's Response
			falls, remain wholly outside the Order Limits. It is considered appropriate to restrict the ambit of this power by reference to the harm that the tree is causing, as opposed to restricting the power geographically. 3) Consultation or agreement is not considered necessary. To the extent works to trees are required for the construction of the Scheme, this will be set out and controlled in the CEMP or LEMP; similar provision will be made in the OEMP, though the Scheme has been designed with appropriate stand-off distances that encroachment from trees is not anticipated. The exception to this would be in an emergency, whereby it would be inappropriate to delay works to render the tree safe whilst seeking agreement from Wiltshire Council. Additionally, any tree felling must not give rise to any new or materially different environmental effects to those set out in the ES, consistent with the process for the discharge of Requirements in Schedule 16, and the extent of the authorised development described in Schedule 1 to the **draft Development Consent Order [REP1-007]**.

ExQ	Respondent	Question	Applicant's Response
			The Applicant notes that consent is required from the highway authority for any trees of hedgerows located within a public highway.
DCO1.27	The Applicant	**Article 40 - Felling or lopping of trees and removal of hedgerows Q2** Article 40(4) states that 'the undertaker may, for the purposes of the authorised development or in connection with the authorised development and subject to paragraph (2), remove the hedgerows specified in the table in Part 1 and the table in Part 2 of Schedule 12 (hedgerows to be removed) to the extent set out in the ecological protection and mitigation strategy approved pursuant to requirement 8 in Schedule 2 (requirements).' However, when describing the extent and location of hedgerow removal in Schedule 12, the applicant refers instead to the 'hedgerows plan'. The ExA assumes that this reference should actually be to the Tree Protection Order (TPO) and Hedgerow Plan [APP-011], but in any event, the ExA questions why the extent of hedgerow removal set out in figures within	The Applicant has corrected the reference within Schedule 12 in the **draft DCO** submitted at Deadline 3 to refer to the "TPO and hedgerow Plan", being the certified document with reference **[APP-011]**. The hedgerows are now listed in order of sheet on which they appear, and within each sheet, in numerical order (excluding preceding text). The TPO and Hedgerow Plan shows the location of each hedgerow that may be subject to removal. The full extent of the hedgerow within the Order Limits is shown in recognition that, until the detailed design of the Scheme is carried out, it is not known which part of the hedgerow will be required to be removed (if any). The extent of the removal is controlled as set out in the **Outline Ecological Protection and Mitigation Strategy (EPMS) [REP1-106]**, within section 5.2 (general precautionary approach to habitat removal works), paragraph

ExQ	Respondent	Question	Applicant's Response
		Annex A of the ecological protection and mitigation strategy [REP1-106] cannot simply be shown on the TPO and Hedgerow Plan [APP-011] instead. The ExA considers that there is unnecessary confusion built into the drafting of Article 40(4) and its corresponding Schedule 12, which should be resolved and simplified. In addition, in relation to updating Schedule 12 with the correct plan name, please also re-order the hedgerow ID column into numerical order.	6.1.2 and section 6.3 in relation to the Cable Route Corridor. The Hedgerow Removal Plan provided at **Annex A to the Outline EPMS [REP1-106]** is indicative at this stage, based on the outline design of the Scheme. It illustrates the effect of the measures within the Method Statements at minimising hedgerow removal. However, the precise hedgerows affected, the location of the removal, and the exact length of any removed sections will only be known following detailed design, and such removals may occur at any point along the hedgerows listed in Schedule 12 and shown on the **TPO and Hedgerow Plan [APP-011]**. Annex A will be updated as part of the detailed EPMS to illustrate the full extent of hedgerow removal; however, it should not be secured at this stage as flexibility is required for detailed design.
DCO1.28	The Applicant Wiltshire Council	**Article 41 - Trees subject to tree preservation orders (TPOs)** Article 41 gives deemed consent for the applicant to fell or lop or cut back the roots of	The Applicant has corrected the reference to Part 3 of Schedule 12 in the **draft DCO** submitted at Deadline 3.

ExQ	Respondent	Question	Applicant's Response
		any tree that is subject to a tree preservation order in Part 4 of Schedule 12 and shown on the TPO and hedgerow plan, or that is within or overhanging land within the Order limits and the relevant tree preservation order was made after the date of the Lime Down Order. The Applicant: There is no Part 4 in Schedule 12. The ExA believes the reference in Article 41 should be to Part 3. Please review and amend accordingly. The ExA note that only two TPOs are included in Part 3 – N/TPO8 and N/TPO42. In the TPO and hedgerow plan [APP-011], N/TPO8 is shown as a considerable area covering most of Grittleton. The applicant is requested to confirm that this is correct and provide a copy of the Council's TPO record(s)/ plan(s) for the trees in question. With regard to N/TP042, there are 9 separate areas shown with this reference number in the TPO and hedgerow plan; again the applicant is requested to confirm that this is correct and provide a copy	The Applicant does not consider that a requirement to consult or agree works to future TPO trees with the Council would be appropriate. Whilst the Order may make provision in relation to specific, listed TPO trees that exist at this point in time, it is not possible to do this for trees that may be placed under TPOs in the future. Those trees have, however, been surveyed and identified in the preparation of the Environmental Statement, and the potential for impacts to those trees fully assessed. This drafting ensures that issuing new tree preservation orders for the trees within the Order Limits cannot be used as a way to impede the delivery of the Scheme. Noting that there would be no difference in environmental effects to a given tree if it is subsequently made subject to a TPO, the additional obligation to consult or agree such works is considered to provide no benefit but instead would increase the administrative burden associated with implementing the Scheme. TPOs within the administrative area of Wiltshire Council can be viewed online here:

ExQ	Respondent	Question	Applicant's Response
		of the Council's TPO record(s)/ plan(s) for the trees in question. Wiltshire Council: Given the importance of trees subject to TPOs, should the applicant be required to consult/ seek agreement from the Council to fell or lop or cut back the roots of any tree that is subject to a TPO during the maintenance, operation or decommissioning stages? Further, following the submission from the applicant of the relevant TPO records/ plans referred to in Part 3 of Schedule 12 and required by EXQ1 DCO1.28 (2) above, the Council may wish to comment further at D4 on the appropriateness of the deemed consent provisions over these trees/ groups of trees.	https://wiltshire-council-open-data-hub-wiltscouncil.hub.arcgis.com/datasets/WiltsCouncil::tree-preservation-orders/about. This confirms N/TPO8 comprises a single 0.75 km^2 area to the southeast of Grittleton and N/TPO42 comprises a number of small areas (total area of 0.1 km^2) both north and south of the M4 near Leigh Delamere. **N/TPO8** (Grittleton Estate, Chippenham) Area Order TPO – Extents within Cable Route Corridor, east of Grittleton and bordering the area of proposed highway improvements at the Alderton Road and The Street Junction in Grittleton. 

ExQ	Respondent	Question	Applicant's Response
			N/TPO42 (M3 - No 3. Leigh Delamere) Mixed Order TPO – Within Cable Route Corridor, north of M4. 
DCO1.29	The Applicant	**Article 46 - Service of Notices** The applicant is requested to justify its approach to Article 46. Service of notices as currently drafted does not require notices to be served through the postal recorded delivery service. Given that some articles within this order require only 14 days' notice to be served and could result in significant human rights implications (such as temporary possession notices), the ExA consider that a more reliable service for the serving of notices should be considered.	Article 46 is drafted so that it is consistent with section 7 of the Interpretation Act 1978 (Ref 22), which confirms that "service is deemed to be effected by properly addressing, pre-paying and posting a letter containing the document and, unless the contrary is proved, to have been effected at the time at which the letter would be delivered in the ordinary course of post." The Applicant notes that there is no requirement to serve notices by recorded post relating to temporary possession under the (not yet in force) Neighbourhood Planning Act 2017 (Ref 9) or to use the survey powers

ExQ	Respondent	Question	Applicant's Response
			under the section 172 of the Housing and Planning Act 2016 or the Electricity Act 1989 (Ref 4; Ref 6). In practice, such notices are typically sent using a service that provides a proof of delivery, so as to protect both the sender and the recipient from uncertainty or disputes relating to delivery; however, it is not considered necessary to mandate this and it is noted that sometimes a recipient will refuse to accept service of a document sent by recorded delivery.
Schedule 1 – Authorised Development			
DCO1.30	The Applicant	**Work No. 2** For the purpose of Work No. 2(h), should the location for the water storage facility for the purposes of firefighting water supply, be identified as above ground or below ground?	The Applicant retains flexibility to locate the water storage above or below ground. This will be determined as part of the detailed design and will take into account the latest guidance and any advice from or preference of Dorset and Wiltshire Fire and Rescue Service.
DCO1.31	The Applicant	**Work No. 3A and No. 3B** For these Work Nos. is there a need to include wording, such as concrete piles/ concrete foundation slabs?	The Applicant considers that construction of foundations to support substations forms part of the infrastructure in Work no. 3A & 3B.

ExQ	Respondent	Question	Applicant's Response
			The design of the foundations has not yet been determined though could include the use of concrete or steelworks. For the avoidance of any doubt, foundations form an integral part of the substation works in Work No.3A & 3B and within Work 1C in relation to sub distribution switch rooms and inverters as set out in Table 3-1 of **ES Volume 1, Chapter 3: The Scheme [APP-055]**. For the avoidance of any doubt, the Applicant has added a reference to foundations for Work No 1(c) and Work No 3 in the draft Development Consent Order submitted at Deadline 3. The Applicant shall complete a Piling Risk Assessment to protect groundwater with final designs approved through the detailed CEMP in consultation with relevant Statutory bodies.
DCO1.32	The Applicant	**Work No. 6** Can the applicant explain what the difference is between '*secondary temporary construction and decommissioning'* (Work No. 6(k)) and	The temporary construction and decommissioning laydown areas in Work No. 7 are the main laydown areas for the Scheme. These will provide storage of materials and equipment prior to installation, the main

ExQ	Respondent	Question	Applicant's Response
		'*temporary construction and decommissioning*' noted in Work No 7?	parking areas for the construction workforce, and provide facilities for the workforce. The secondary temporary construction and decommissioning laydown areas are smaller and will be used for short-term storage of smaller quantities of materials and equipment close to where they are being installed. This approach enables materials to be moved in batches close to where they will be used, making construction more efficient.
DCO1.33	The Applicant	**Work No. 8A and No. 8B** This Work No. relates to creation of accesses for the public highways, visibility splays and works associated with movement of abnormal indivisible loads. Can the applicant clarify if 'remedial work' would also be instigated post construction, during maintenance and post-decommissioning, and whether it needs to be added to the list of works?	A remedial work in the context of works to the highway are works to resolve a defect, for example if the creation of an access was not carried out to the appropriate standard. Work Nos. 8A and 8B operate to provide planning consent for the creation of new accesses and the associated works such as visibility splays. The creation, alteration and reinstatement of those accesses is carried out pursuant to the powers in Part 3 (Streets) of the **draft Development Consent Order [REP1-007]**. A remedial work would be carried out where, for example, work was carried out but fell short

ExQ	Respondent	Question	Applicant's Response
			of being 'to the reasonable satisfaction of the street authority". In this context, remedial works do not form part of the authorised Work but instead constitute rectification of an issue meaning that the Work does not meet the necessary standard – this does not change the nature or description of Work No. 8A or 8B.
DCO1.34	The Applicant	**Associated Development** A number of the works identified as associated development on page 41 of the dDCO [REP1-007] (clean version) appear to duplicate works already included within the individual Work Nos. For example: *(a) fencing, gates, boundary treatment and other means of enclosure;* *(b) bunds, embankments, trenching and swales;* *(d) surface water drainage systems, storm water attenuation systems including storage basins, oil water separators, including channelling and culverting and works to existing drainage networks;*	1) The inclusion of the works identified as further associated development in Schedule 1 is intended to ensure that all works and operations that are required to construct, operate and maintain the Scheme are authorised by the DCO. The numbered works must be carried out within the area shown on the **Works Plans [EN010168/APP/2.3]** (Revision 3). The further associated works are not so constrained and provide flexibility for works to be carried out in the event it is identified, at detailed design, that they are required. This is consistent with the DCO authorising the outline Scheme design. The flexibility provided by this paragraph is restricted by the final words, which limit any such works to within the scope of the

ExQ	Respondent	Question	Applicant's Response
		(h) works for the provision of security and monitoring measures such as CCTV columns, lighting columns and lighting, cameras, lightning protection masts, weather stations, storage containers, communication infrastructure, and perimeter fencing; *(g) ramps, bridges and other means of access;* Provide clarification why that is the case. Explain why the following words in **bold** text should not be added to the final paragraph of the associated development section: *'…**and do not give rise to any materially new or materially different environmental effects to those identified in the environmental statement**'.*	environmental impact assessment recorded in the environmental statement. 2) The Applicant, in drafting the DCO, had regard to the drafting preferences of the Secretary of State for Energy Security and Net Zero. The words suggested by the ExA were included in the draft DCO for West Burton and were replaced by the Secretary of State in order to "*prevent the DCO from inadvertently permitting possible further work with environmental effects that are unlikely to have been assessed*". The clear preference has been for wording that refers to the scope of the environmental assessment, with the precise wording in the draft DCO being preferred for the reasons given in the decision letter on one of the earliest DCO projects, Ipswich Chord: that *"if such elements were excluded at this stage from the scope of the consent given by the Order, they could not be the subject of a subsequent consent under those Regulations at a later stage, nor would the requirements in the Order apply to them"*. Accordingly, it is preferable to include a "catch-all" provision

ExQ	Respondent	Question	Applicant's Response
			within the DCO to proactively include any unforeseen elements of the Scheme into the ambit of the protections given by the Requirements, restricted by the assessed Rochdale Envelope. As confirmed by the Secretary of State in Ipswich Chord: *"in relation to the unspecified works … it is appropriate that consent is limited to works which fall within the scope of the environmental impact assessment recorded in the environmental statement"*. The Applicant has therefore not made the suggested amendment.
Schedule 2 – Requirements			
DCO1.35	The Applicant	**The use of the word 'substantially'** The ExA note that Requirements 6 to 20 which require approval of detailed documents, employ the phrase *'must be substantially in accordance with…'* [the outline version of the said document]. The ExA is concerned that inclusion of the word 'substantially' provides flexibility that is not justified. The ExA also notes that the Environment Agency has also commented on this issue [REP1-151] in	The Applicant considers that the inclusion of "substantially" is necessary to ensure that there is sufficient flexibility for the detailed management plan to be updated so that it properly controls the Scheme following detailed design. It is noted that Lincolnshire County Council, an authority with considerable experience with solar DCOs, confirmed the appropriateness and suitability of this drafting

ExQ	Respondent	Question	Applicant's Response
		relation to Requirements 6, 11 13, 14 and 20, stating that the inclusion of the word may erode the environmental protections put in place, that the overarching plans provide a large scope for the detail to come later, and the Rochdale envelope applies, such that flexibility is built into the process. Delete the word 'substantially' in the wording of Requirements 6 to 20 or provide reason and justification for its inclusion in each of the Requirements.	on the Springwell Solar Farm (EN010149), stating: *"In particular, [the Council] is satisfied that requiring the written scheme of investigation to be "substantially in accordance with" the outline scheme would allow appropriate flexibility to respond to issues arising from detailed design or any other new relevant circumstances whilst still preserving the ability of the planning authority to refuse to approve any scheme it considers inappropriate or inadequate, whether or not it is substantially in accordance with the outline scheme."* (See **[REP3-079]** on the Springwell project). Schedule 16 (Procedure for discharge of Requirements) ensures that any variation in the management plan does not erode the environmental protections, placing an obligation on the Applicant to proactively include a statement to confirm whether the subject matter of the application will give risk to any materially new or materially different environmental effects (paragraph 2(4)). In such circumstances, if the application is not responded to, it is deemed refused, ensuring

ExQ	Respondent	Question	Applicant's Response
			that new effects are not authorised inadvertently. The Applicant remains confident that the inclusion of the word "substantially" is appropriate and provides necessary flexibility for the detailed design of the Scheme and in no way waters down the environmental protection provided by the Requirements and the management plans.
DCO1.36	The Applicant	**Approvals process** The ExA note that a large number of Requirements which require submission of documents for approval by the planning authority do not specify that approval is to be provided in writing. Schedule 16 also does not confirm that approvals or refusals are to be provided in writing. The ExA note that Article 47 includes an obligation that any consent, agreement or approval to be validly given, must be given in writing, but specifically excludes this obligation for Requirements. The applicant is asked to explain that exclusion in Article 47.	The Applicant has updated paragraph 2(2) of Schedule 16 to require that the relevant planning authority must "give notice in writing to the undertaker of its decision". Please see the updated **draft Development Consent Order** submitted at Deadline 3.

ExQ	Respondent	Question	Applicant's Response
		The applicant is also asked to consider making changes to the Requirements and Schedule 16 to specify that all decisions relating to the discharge of Requirements are required to be made in writing, or explain why that is not necessary.	
DCO1.37	The Applicant Wiltshire Council	**Requirement 5 - Detailed design approval** The Applicant: Requirement 5 is missing a '— *(1)'.* Please insert at next iteration of the dDCO. Both Parties: On the basis that Work Nos 1, 2 and 3 would include some form of fencing, gates, boundary treatment, other means of enclosure, signs, and CCTV and lighting columns, the ExA considers that this detail may need to form part of the detailed design approval, and thus may need to be included as a new sub point 5(1)(h). Both parties are asked to comment on that suggestion.	The numbering has been corrected in the updated **draft Development Consent Order** submitted at Deadline 3. The Applicant does not consider that fencing, lighting etc should be added into the list of details to be approved under Requirement 5. This is because these elements are already subject to approval under other Requirements. Both temporary and permanent fencing is required to be approval under Requirement 10. Signage, CCTV and lighting form part of the **Outline CEMP [EN010168/APP/7.12]** (Revision 4) (see Table 7 and sections 2.5 and 2.6, respectively) and will be approved under Requirement 13. Each of these requirements must be approved prior to commencement of that part of the authorised development.

ExQ	Respondent	Question	Applicant's Response
		In addition, both parties are asked to comment on whether the following tailpiece in **bold** text should be added to Requirement 5(2): *(2) The details submitted must accord with Table 2-1, Table 2-2 and Table 2-3 (as applicable) of the design principles and parameters,* ***and the relevant planning authority must be*** **satisfied that there would be no materially new or materially different environmental effects to those identified in the environmental statement.**	2) The Applicant does not consider that the proposed additional text would result in any greater control over the design of Work Nos. 1, 2 and 3 than already exists in the Requirement. Requirement 5 requires that the design "must accord" with the design principles and parameters. This does not allow any flexibility and ensures that the final design is within the parameters assessed for the Environmental Statement. The only way to diverge from the parameters in the design principles and parameters document would be to amend that document under Requirement 3. Requirement 3 expressly states that the relevant planning authority must not approve any amendments to documents unless it has been demonstrated to its satisfaction that the approval is unlikely to give rise to any materially new or materially different environmental effects. In this way, the proposed restriction is already secured in respect of the design of the Scheme and the addition of the wording into Requirement 5 would be an unnecessary and potentially unclear duplication.

ExQ	Respondent	Question	Applicant's Response
DCO1.38	The Applicant Wiltshire Council Dorset and Wiltshire Fire and Rescue Service	**Requirement 6 - Battery safety management** The ExA seeks comment from all parties on whether it is necessary to introduce a review and re-approval mechanism into Requirement 6, so that as technology advances and as batteries are periodically replaced, the Battery Safety Management Plan is updated.	The Applicant considers that the appropriate place to provide for a mechanism for periodical review of the Battery Safety Management Plan is within the **Outline BSMP [REP1-110]**. This is to provide flexibility to agree the approach to incorporating updates to best practice, or any divergence in best practice that corresponds to emerging battery technology, with the relevant stakeholders. A provision for review within the outline plan would be binding as the detailed plan must be substantially in accordance with the outline plan and then implemented as approved.
DCO1.39	The Applicant	**Requirement 7 - Landscape and ecological management plan** The ExA seeks comment on whether it is necessary to include reference to PPW in Requirement 7(1) as noted in **bold** text as follows: *7.—(1) No part of the authorised development may commence **and no permitted preliminary works comprising site clearance may take place** until a written landscape and ecological management plan*	The Applicant does not consider this additional drafting to be necessary, noting the revised approach of securing an environmental management plan specifically for the permitted preliminary works. Requirement 13 (Construction environmental management plan) has been updated in the draft **DCO** submitted at Deadline 3 to secure this new management plan to apply to the carrying out of any permitted preliminary works, ensuring that necessary mitigation for any permitted preliminary works is secured.

ExQ	Respondent	Question	Applicant's Response
		has been submitted to and approved by the relevant planning authority for that part in consultation with the relevant statutory nature conservation body.	
DCO1.40	The Applicant	**Requirement 8 - Ecological protection and mitigation strategy** The ExA seeks comment on whether it is necessary to include reference to PPW in Requirement 8(1) as noted in **bold** text as follows: *8.—(1) No part of the authorised development may commence, **and no permitted preliminary works comprising site clearance may take place** until a written ecological protection and mitigation strategy has been submitted to and approved by the relevant planning authority in consultation with the relevant statutory nature conservation body.*	The Applicant does not consider this additional drafting to be necessary, noting the revised approach of securing an environmental management plan specifically for the permitted preliminary works. Requirement 13 (Construction environmental management plan) has been updated in the **draft DCO** submitted at Deadline 3 to secure this new management plan to apply to the carrying out of any permitted preliminary works, ensuring that necessary mitigation for any permitted preliminary works is secured.
DCO1.41	The Applicant	**Requirement 9 - Biodiversity net gain** The ExA seeks comment on whether it is necessary to include reference to PPW in	The Applicant does not consider this additional drafting to be necessary, noting the revised approach of securing an environmental management plan specifically for the permitted preliminary works. Requirement 13

ExQ	Respondent	Question	Applicant's Response
		Requirement 9(1) as noted in **bold** text as follows: *9.—(1) No part of the authorised development may commence* ***and no permitted preliminary works comprising site clearance may take place*** until *a biodiversity net gain strategy has been submitted to and approved by the relevant planning authority, in consultation with the relevant statutory nature conservation body*	(Construction environmental management plan) has been updated in the **draft DCO** submitted at Deadline 3 to secure this new management plan to apply to the carrying out of any permitted preliminary works, ensuring that necessary mitigation for any permitted preliminary works is secured.
DCO1.42	The Applicant	**Requirement 10 - Fencing and other means of enclosure** The ExA seeks clarity on whether any permanent fencing would be maintained in good condition and appearance (and at the undertaker's expense) during the operation of the authorised development? If so, wording to that effect should be included in the Requirement. If not, provide clarity and justification on who would be responsible for maintaining the fencing in good condition and appearance?	The permanent fencing will be subject to periodic inspection, as set out in paragraph 2.2.2 of the **Outline OEMP [EN010168/APP/7.13]** (Revision 4). This approach ensures that any defects in the fencing will be promptly identified and rectified. To improve clarity on this point, the **Outline OEMP [EN010168/APP/7.13]** (Revision 4) has been updated to expressly confirm that the fencing will be maintained in good condition.
DCO1.43	The Applicant	**Requirement 12 - Archaeology**	1) Sub-paragraph (1) is in square brackets reflecting that the Applicant does not anticipate

ExQ	Respondent	Question	Applicant's Response
		Delete the following symbols […] around Requirement 12(1). Also, the ExA seeks comment on whether it is necessary to include reference to PPW in Requirement 12(2) as noted in **bold** text as follows: *12 (2) No part of the authorised development may be commenced **and no permitted preliminary works comprising intrusive archaeological surveys may take place** until a written scheme of investigation for that part has been submitted to and approved by the relevant planning authority.*	further evaluative archaeological work to be required. The Applicant has provided Wiltshire Council with the full evaluative trenching reports and awaits confirmation that these are signed off. Once this has been received, all evaluative work to inform the mitigation required for the Scheme will have been completed and paragraph (1) will be removed. The intention of the remainder of Requirement 12 is that the AMS provides the framework for the mitigation design that will be included in the written schemes of investigation for archaeological mitigation. The written schemes of investigation can only be drafted once the detailed design of the Scheme is finalised, as they will set out the exact mitigation required in each area, based on the principles in the AMS. The Applicant has updated this Requirement in the **draft DCO** submitted at Deadline 3 to clarify this approach. 2) The Applicant does not consider this additional drafting to be necessary. As clarified at 1), it is anticipated that further evaluative archaeological investigation (which may

ExQ	Respondent	Question	Applicant's Response
			include intrusive archaeological surveys) will not be required, with the work carried out to date being sufficient to confirm that the mitigation strategy is appropriate. Any further evaluative works would be carried out in accordance with the principles in the AMS and would inform the site-specific WSIs. It would therefore not be appropriate to require a WSI, which specifies mitigation requirements, for investigative works that inform the detailed design and, in turn, the contents of the WSI.
DCO1.44	The Applicant National Highways	**Requirement 15 - Construction traffic management plan** Should Requirement 15(3), which requires the relevant planning authority to consult with South Gloucestershire Council and the relevant highway authority before approving the Construction Traffic Management Plan, also include the requirement to consult with National Highways?	Requirement 15 is required to be approved by the relevant planning authority in consultation with South Gloucestershire Council and the relevant highway authority. This reflects that South Gloucestershire Council, as the relevant planning authority for some of the highway improvement works, would ordinarily be the discharging authority. However, it has been agreed that Wiltshire Council will discharge this requirement in full, including those parts that apply to South Gloucestershire Council's area. Additionally, the relevant highway authority must be consulted. This will be one or all of:

ExQ	Respondent	Question	Applicant's Response
			Wiltshire Council Highway Authority; South Gloucestershire Council Highway Authority; and National Highways. Precisely which highway authorities are relevant will depend on whether a single CEMP is submitted for approval, or separate CEMPs for individual parts of the Scheme.
DCO1.45	The Applicant	**Requirement 16 - Public rights of way and permissive paths** The ExA seeks comment on whether it is necessary to include reference to PPW in Requirement 16(1) as noted in **bold** text as follows: *16.—(1) No part of the authorised development may commence **and no permitted preliminary works which may affect existing public rights of way may take place** until a public rights of way and permissive paths management plan for that part has been submitted to and approved by the relevant planning authority.*	The Applicant does not consider this additional drafting to be necessary, noting the revised approach of securing an environmental management plan specifically for the permitted preliminary works. Requirement 13 (Construction environmental management plan) has been updated in the **draft DCO** submitted at Deadline 3 to secure this new management plan to apply to the carrying out of any permitted preliminary works, ensuring that necessary mitigation for any permitted preliminary works is secured.
DCO1.46	The Applicant	**Requirement 17 - Soil management**	The Applicant does not consider this additional drafting to be necessary, noting the revised approach of securing an environmental

ExQ	Respondent	Question	Applicant's Response
		The ExA seeks comment on whether it is necessary to include reference to PPW in Requirement 17(1) as noted in **bold** text as follows: *17.—(1) No part of the authorised development may commence* ***and no permitted preliminary works comprising environmental surveys, geotechnical surveys, intrusive archaeological surveys and other investigations for the purpose of assessing ground conditions, site clearance, remedial work in respect of any contamination or other adverse ground conditions, or diversion and laying of apparatus may take place*** *until a soil resources management plan for that part has been submitted to and approved by the relevant planning authority.* The ExA also seeks comment on whether the Requirement needs to be extended to add provision for the submission of a remediation strategy and verification plan prior to commencement of the development or PPW?	management plan specifically for the permitted preliminary works. Requirement 13 (Construction environmental management plan) has been updated in the **draft DCO** submitted at Deadline 3 to secure this new management plan to apply to the carrying out of any permitted preliminary works, ensuring that necessary mitigation for any permitted preliminary works is secured.

ExQ	Respondent	Question	Applicant's Response
DCO1.47	The Applicant Wiltshire Council	**Requirement 20 - Decommissioning and restoration** NPS EN-3 paragraph 2.10.146 states that *'The Secretary of State should ensure that the applicant has put forward outline plans for decommissioning the generating station when no longer in use and restoring the land to a suitable use (taking into account paragraphs 2.10.68 and 2.10.69)'.* The ExA seeks comment on whether it is necessary for the outline Decommissioning Strategy [REP1-100] to include an outline Restoration Plan.	The **Outline Decommissioning Strategy [REP1-100]** provides, at paragraph 2.1.3, for "the land to be returned to its original use and condition as far as practicable and returned to the landowner". The measures set out in the tables (1 – 19) to the strategy provide for how this restoration will be done. The Applicant is satisfied that the plans for decommissioning and restoring the land are inherent in the outline Decommissioning Strategy, and provision of an outline Restoration Plan would only duplicate the measures set out within the **Outline Decommissioning Strategy [REP1-100]**.

2.8 Ecology and Biodiversity

ExQ	Respondent	Question	Applicant's Response
EB1.1	Natural England	Environmental Impact (Agricultural) Regulations Would the land within the solar PV panel areas (Lime Down A – E inclusive), be subject to the EIA (Agricultural) (England) (No. 2) Regulations 2006 post-decommissioning given it would be out of agricultural use for a period of at least 60 years? Should this be the case, you are asked to provide a commentary as to the requirements of the above Regulations and the process the landowners would need to go through to return the land to agricultural use. Furthermore, if the land under the panels is to be grazed by sheep during the operation phase, what might that mean under the terms of the above Regulations should the intention be to return the land to arable farming instead of grazing.	The Applicant notes this is addressed to Natural England though it is anticipated grazing by sheep is only a potential future land management option and is not relied upon or requirement for the Scheme. This has been done to provide a conservative basis for mechanical grassland management alone. It is also noted that no areas used for Solar PV infrastructure have been grazed by sheep in recent years. The Applicant cannot require landowners to undertake concurrent sheep grazing under its DCO however it will seek opportunities to enable this to occur where landowners wish to do so. The Applicant maintains that the Scheme is reversible, with all fields returned to landowners control following decommissioning. It would be open to the original landowner to return the land to its original land use or another land use they wish to pursue, including arable farming or grazing. The Scheme does not prevent this.

ExQ	Respondent	Question	Applicant's Response
EB1.2	The Applicant Natural England The Environment Agency	Mitigation Hierarchy – CRC ES Chapter 9 [REP1-015] sets out the approach to survey work undertaken in the CRC. The role of the Ecological Clerk of Works (ECoW) is set out in the outline Ecological Protection and Mitigation Strategy (oEPMS) [REP1-106] in terms of construction of both solar PV sites and the CRC. Given the lack of survey work it is not clear what options would be available to the ECoW to re-route the cable route to avoid protected habitats and species. The applicant: You are asked to set out how, without specific species and habitat surveys, the construction of the cable route would follow the mitigation hierarchy at set out in NPS EN-1. Specifically, you are asked to demonstrate how the cable route would avoid sensitive habitats and species, as opposed to just mitigate any harms. Natural England and the Environment Agency:	All areas of the Cable Route Corridor have been subject to comprehensive baseline habitat surveys which has enabled identification of sensitive habitats and an evaluation of the suitability of habitats for various wildlife species to be made, which has in turn informed the Scheme design. The locations of 'Avoidance Areas' as described in **ES Volume 3, Appendix 3-2: Cable Route Construction Method Statement [APP-183],** are where cable installation works will adopt trenchless technologies (such as Horizontal Directional Drilling (HDD)) which will seek to avoid impacts on any habitats or species within Avoidance Areas. These have been identified through an iterative EIA process including taking into account baseline desk study and the findings of habitat surveys. Avoidance Areas have been embedded into the scheme where the Cable Route Corridor crosses certain habitats likely to be of elevated value for biodiversity such as woodlands and watercourses likely to support migratory fish species (as described in Paragraph 9.10.317

ExQ	Respondent	Question	Applicant's Response
		Do either of you have any comment to make on the applicant's approach.	of **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]**. The Applicant considers this to be in accordance with the mitigation hierarchy set out in NPS EN-1. Following on from this, the approach to identifying and mitigating impacts at the detailed design and construction phase will be to avoid impacts in the first instance. The Order Limits with respect to the Cable Route Corridor has a width of 50 m along the majority of its length. Within the typical 50 m wide Cable Route Corridor, the construction working width will in practice be 25 m wide. It will be narrower still where the cable route crosses field boundaries such as hedgerows, where the working width will typically be 10 – 12m wide. Pre-construction surveys and inspections are set out within the **Outline EPMS [REP1-106]** for a number of wildlife species and species groups. The results and findings of these inspections / surveys will then be used to determine the final siting of the cable route. As the Order Limits cover a wider area than is required to be impacted for cable installation

ExQ	Respondent	Question	Applicant's Response
			works, the Scheme benefits from the ability to micro-site the final cable trenches so that any identified protected / sensitive features can be avoided such as badger setts, trees with bat roosting potential, or shelter features used by riparian mammals, as described in Paragraphs, 9.10.161, 9.10.175, and 9.12.24 respectively within **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015].** The Applicant again considers this to be in accordance with the mitigation hierarchy set out in NPS EN-1(Ref 12). Where impacts cannot be avoided, appropriate measures would be adopted to mitigate impacts as far as possible (for example through sensitive timing of works, adoption of sensitive habitat removal techniques, attendance of an ecologist in a watching brief role) or, where appropriate, conduct works under relevant mitigation licences. These are secured within the **Outline EPMS [REP1-106]**.
EB1.3	The Applicant	**Biodiversity Net Gain** Draft DCO [REP1-007] Requirement 9 secures a minimum of 10% Biodiversity Net Gain (BNG), whereas the BNG Assessment [REP1-	The **Planning Statement [REP1-087]** takes account of the individual BNG scores for habitat units, hedgerow units and watercourse units as set out in the **Biodiversity Net Gain**

ExQ	Respondent	Question	Applicant's Response
		089] demonstrates 36.10% BNG in respect of habitat units, 12.74% in respect of hedgerow units and 19.89% of watercourse units. Explain the reason for the difference between the % figure in Requirement 9 and the BNG assessment. Which of the above figures are relied upon in the assessment of beneficial effects in ES Chapter 9 [APP-061] and the wider planning balance within the Planning Statement [REP1-087]? What weight should the ExA afford to the delivery of a minimum of 10% BNG if that is all that is secured in Requirement 9? What is the highest % BNG that the Applicant is willing to commit to within Requirement 9 of the dDCO? You are also asked to respond to the concerns regarding your BNG metric raised by Wiltshire Council in their D2 submission [REP2-048].	**Assessment Report [REP1-089]** in the planning balance and the Applicant considers BNG should be afforded moderate positive weight. However, it should be noted that the overall planning balance does not solely rely upon BNG and takes account of the positive (such as the provision of low carbon electricity, permissive paths, employment generation, economic benefits and skills training), neutral and negative impacts of the Scheme. The figures provided within the **Biodiversity Net Gain Assessment Report [REP1-089]** are a reflection of the combined habitat loss, retention, creation and enhancement proposals assessed within **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]**. The quantified figures are not directly relied upon in assessing beneficial effects within **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]**, which are a consideration of the likely outcomes of the proposed measures on each ecological feature assessed, The BNG figures provide a quantitative measure of the biodiversity benefits associated with the habitat proposals

ExQ	Respondent	Question	Applicant's Response
			(as shown in **ES Volume 2, Figure 3-4-1 to 3-4-5.2 [REP1-029 to REP1-032]**) that have been assessed on a more qualitative basis within **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]**. The highest % BNG the Applicant is willing to commit to for each unit type is the following: +30% Habitat Units +10% Hedgerow Units +10% Watercourse Units These figures are lower than the figures the Scheme is anticipated to deliver as reported in the **Biodiversity Net Gain Assessment Report [REP1-089]**. However, this is in order to retain design flexibility and account for any adjustments as a result of detailed design changes, and also to account for any potential future changes to either the published Statutory Metric or the application of BNG which may affect the figures at the detailed design stage.

ExQ	Respondent	Question	Applicant's Response
			A full response to Wiltshire Council's comments on the BNG Metric within their D2 submission (namely comments WCD1-120 to WCD1-129) has been provided within **Applicant's Response to Deadline 2 Submissions [EN010168/EXAM/9.30]**.
EB1.4	The Applicant Any Affected Person	**Agri-Environment Schemes** Is the applicant or any Affected Person aware of any agri-environment schemes which may be underway on any land parcel within or adjacent to the Order limits, such as Countryside Stewardship, Landscape Recovery Fund, England Woodland Creation Grant, or other agri-environment schemes, which may be affected by the proposed development? If so, please provide details including a map and commentary on the type of scheme(s), as well as information on whether the farmer would either lose the funding or be in breach of the terms of such funding as a result of the proposed development taking place?	In discussions with option holders within the Solar PV Sites, the Scheme has designed out any areas under agri-environment schemes it has been made aware. Examples include the removal of works in the NE corner of field C15 where interactions with the current environment scheme in place have been avoided. Also, field parcels, E5 and E30 were removed from the order limits entirely due to the long-term environmental management schemes in place at this location.
EB1.5	Wiltshire Council	Bat Surveys	Question not directed at the Applicant.

ExQ	Respondent	Question	Applicant's Response
	Natural England	In considering the contents of [REP1-218] can each party confirm, or otherwise, that you are content with the applicant's approach to bat surveys. If you are not satisfied, please provide details. If parties are satisfied, please provide comment on how it meets the requirements of the mitigation hierarchy.	
EB1.6	The Applicant Wiltshire Wildlife Trust	Bat Behaviour [REP1A-069] suggests that bats are confusing solar PV panels for water and that the panels are acting as sensory traps. You are both asked to comment on this submission.	A response to REP1A-069 was provided by the Applicant at Deadline 2 in the **Applicant's Response Deadline 1A Submissions [REP2-040]**. Responses to comments TW-001 and TW-002 regarding the suggestion that bats may confuse solar PV panels for water and that panels act as sensory traps were provided as follows: 'The Applicant notes this comment and welcomes the provision of the article reference published by The Pulse in April 2026. Having reviewed the article (Accessed 18 May 2026: https://www.ecoportal.net/en/bats-confuse-solar-panels-with-water/20246/), several references are made to a UK-based research study on the effects of solar panels

ExQ	Respondent	Question	Applicant's Response
			on bats, but no specific reference or link to the research is provided. Given that this article does not provide a source for the research to which it refers, it has not been possible for the Applicant to verify and review the source material. Although the precise research referred to in the article submitted in REP1A-069 has not been identified as described above, the Applicant considers this is in reference to studies which demonstrate that bats use echolocation to detect and recognise water bodies, and that smooth surfaces can be perceived by bats as water bodies using the same cues (Greif & Siemers, 2010 (Ref 23) & Russo et al, 2012 (Ref 24)).This has led to some concern that the presence of solar panels may have adverse impacts on bats when echolocating, for instance by confusing solar panels for waterbodies, from which bats both glean insects and drink. These studies into this potential impact do not make any reference to solar panels or indicate any potential significant ecological impact is

ExQ	Respondent	Question	Applicant's Response
			presented by this behaviour. Furthermore, these studies have shown how bats are adept at quickly modifying their behaviour to avoid attempting to glean or drink from smooth surfaces. As such it can be inferred that collision risks are unlikely to present a significant issue for bats, or that detrimental impacts on bat populations would arise from mistaking panel surfaces for water.
EB1.7	The Applicant Natural England	Great Crested Newts ES Chapter 9 [REP1-015] states that the District Level Licencing scheme would be entered into to mitigate effects on Great Crested Newts. Both parties are asked to provide an update on this process and submit a copy of the granted license into the examination. Furthermore, both parties are asked to respond to specific concerns raised by Wiltshire Council in their D2 response paragraph 14.5 [REP2-048].	In order to mitigate for potential impacts to great crested newts (GCN) arising within the Cable Route Corridor specifically, the Applicant intends to enter into Natural England's District Level Licensing (DLL) scheme, as stated within **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP-015]**. A DLL enquiry form was submitted by the Applicant to Natural England on 27 October 2025 for entry of Lime Down Solar Park Cable Route Corridor into the DLL scheme. A provisional Impact Assessment and Conservation Payment Certificate (IACPC) was received from Natural England on 03 December 2025. The Applicant returned a signed copy of the provisional IACPC to

ExQ	Respondent	Question	Applicant's Response
			Natural England on 09 January 2026, and a counter-signed IACPC was issued by Natural England on 30 April 2026. This counter-signed document **CONFIDENTIAL Great Crested Newt District Level Licence Impact Assessment and conservation Payment Certificate (IACPC) [REP2-041]** was submitted into the examination by the Applicant at Deadline 2. It should be noted that the **IACPC [REP2-041]** does not constitute a licence, although it demonstrates the agreement of both the Applicant and Natural England for the Scheme to adopt the DLL scheme. An application will be made to Natural England should the Scheme be consented, for a licence under Regulation 55 of the Conservation of Species and Habitats Regulations 2017 (as amended) and the Wildlife and Countryside Act 1981 (as amended) (Ref 25; Ref 26). A licence can only be applied for once the Scheme has been consented. In the Council's response to documents submitted at Deadline 2 **[REP2-048]**, comment WCD1-116 raises concerns regarding the

ExQ	Respondent	Question	Applicant's Response
			omission of reference to the presence of 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, 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.
EB1.8	The Applicant Wiltshire Wildlife Trust	Bird Surveys In its LIR [REP1-137] Wiltshire Council comment that given the lack of breeding and wintering bird surveys in the CRC the impact of	The Applicant considers that a suitably precautionary and reasonable assessment of impacts for breeding and wintering birds has been undertaken pertaining to the Cable Route Corridor and does not consider it necessary or proportionate to have undertaken detailed

ExQ	Respondent	Question	Applicant's Response
		the cable route construction on birds cannot be fully known. The applicant: Explain beyond what has already been submitted how the applicant has have fully considered the potential impact on breeding and wintering birds taking the mitigation hierarchy into account and how this has informed the CRC. Wiltshire Wildlife Trust: You are requested to comment on the suitability of the applicant's approach to breeding and wintering birds in the CRC.	surveys for these taxa to underpin the impact assessment. This is on account of the short-term, temporary, and progressive nature of the works associated with this element of the Scheme, whereby habitat will be reinstated on completion of works in any one area, following a relatively short construction period. Detailed breeding and wintering bird surveys were completed for the Solar PV Sites, where impacts are greater in magnitude and duration. The extensive dataset gathered from these surveys, as well as the findings of a desk study, have been used to inform the evaluation of the breeding and wintering bird assemblage within the Cable Route Corridor. This is considered appropriate given the similarity of the habitats between the Cable Route Corridor and the Solar PV Sites (as identified through detailed surveys). Both the Solar PV Sites and Cable Route Corridor predominantly comprise lowland mixed farmland fields, with a higher proportion of arable land compared to pasture coverage within each, and it is therefore reasonable to assume a similar assemblage of birds are present across the Order Limits.

ExQ	Respondent	Question	Applicant's Response
			It is entirely conceivable that potentially adverse impacts on breeding and wintering birds will occur within the Cable Route Corridor, as reported in **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]**. However, no permanent habitat removal will occur within the Cable Route Corridor, and it is noted that the habitat type of any one field can change both during and between years in response to typical rotational agricultural practices (and thereby the suitability for birds). As such, detailed surveys for breeding or wintering birds are considered highly unlikely to have shaped the siting of the Cable Route Corridor, or the determination of appropriate avoidance or mitigation measures. Appropriate avoidance and mitigation measures for both breeding and wintering birds, to minimise impacts resulting from cable installation works, have been considered and detailed within the **Outline EPMS [REP1-106]**, which is secured by Requirement 8 of the **draft DCO [REP1-007]**. For breeding birds, avoidance measures relevant to cable installation works include

ExQ	Respondent	Question	Applicant's Response
			inspections for nests within all suitable nesting habitat to be removed (including hedgerows, trees and the open fields) prior to commencement of works, where they take place during the breeding season. Should any nests be identified, these will be safeguarded with appropriately sized and adequately protected buffer zones. If necessary, works may also need to be delayed to avoid impacts on nests. Such measures are secured within Method Statements 5 and 10 of the **Outline EPMS [REP1-106]**. With respect to wintering birds, this includes an inspection of new fields immediately prior to the commencement of works during the winter months, to identify any flocks of birds susceptible to disturbance by cable installation works. If such flocks are identified, works will be delayed until the flocks have moved on, to avoid impacts as far as possible. This is secured as part of Method Statement 11 of the **Outline EPMS [REP1-106]**. These measures will be adopted in all areas of the Cable Route Corridor, exercising the precautionary principle, and are not

ExQ	Respondent	Question	Applicant's Response
			discriminatory with regard to the suitability of habitat for breeding or wintering birds. The measures seek to avoid impacts in the first instance (for example by delaying works or avoiding identified nests) and then implementing appropriate mitigation measures if impacts cannot be avoided. It is the Applicant's view, therefore, that the mitigation hierarchy has been correctly and appropriately considered with respect to both breeding and wintering birds in the Cable Route Corridor.
EB1.9	The Applicant	American Mink ES Chapter 9 [REP1-015] identifies American Mink in Lime Down E. You are asked to detail the measures you intend to use to prevent/discourage the spread of American Mink.	American mink is a non-native mammal species listed under Schedule 9 of the Wildlife and Countryside Act (WCA) 1981 (as amended, Ref 26). Section 14 of the WCA states that it is an offence to release or allow to escape into the wild any animal listed in Part 1 of Schedule 9, such as American mink. The assessment of potential effects of the Scheme on American mink presented in Paragraphs 9.10.335, 9.10.33**7**, and **9.10.338** of **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]** concludes that the Scheme is not anticipated to cause the spread

ExQ	Respondent	Question	Applicant's Response
			of American mink beyond current extents, which would otherwise result in an offence. As the Scheme is not contributing to the spread of American mink, no specific measures are proposed. The Scheme is not expected to result in major changes to the watercourse network which could result in the spread of mink from existing home ranges.
EB1.10	The Applicant Wiltshire Council	Beavers ES Chapter 9 [REP1-015] comments that beavers are not presently affected by the proposed development but are known to be present in the River Avon catchment area and thus could be affected during the operation, maintenance and decommissioning phases. Both parties are asked to consider whether the presence of beaver in the River Avon catchment means that they could spread towards the site during the 60-year period. If it is feasible or likely, then both parties are asked what this might mean for the proposal and the ecological enhancement measures such as the	As set out within **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]**, no evidence of beavers was recorded during baseline surveys across the Scheme, and this species is not believed to be present currently within the Order Limits. Several watercourses were however identified as being potentially suitable to support beaver. Beavers are increasing in abundance in the UK and wild populations have now been recorded in the southwest of the country, including within the River Avon catchment. It can be assumed that beavers will continue to expand their range in England as very little competition for territories or foraging resources exist, owing to their limited abundance. The

ExQ	Respondent	Question	Applicant's Response
		riparian habitat planting over the lifetime of the development.	carrying capacity of the watercourse network in the south west (including the River Avon catchment) can be reasonably assumed to be much higher than the current number of individual beaver/beaver territories present. Watercourses within the Solar PV Sites and Cable Route Corridor are hydrologically linked with the Avon River catchment and, given the presence of suitable watercourses within the Order Limits, it is feasible that beaver could spread beyond their current extents and into watercourses within the Order Limits over the 60-year lifetime of the Scheme. Measures for the protection of riparian mammals during Construction, including beavers should they be found to have moved into the Order Limits prior to construction, are set out within the **Outline EPMS [REP1-106]**. Such measures include delivery of a toolbox talk to site personnel, precautionary approach to works including a pre-commencement check of watercourses by a suitably qualified ecologist, and obtaining mitigation licences from Natural England, if required.

ExQ	Respondent	Question	Applicant's Response
			During Operation and Maintenance of the Scheme limited potential impacts on beaver are anticipated should the existing population within the Avon River catchment spread into watercourses within the Solar PV Sites, as the watercourses are not anticipated to be impacted. However, it is recognised by the Applicant that there is potential for conflicts to occur, arising as a result of beaver foraging or dam creation or example. The majority of beaver activity and resulting impacts, including foraging, occur within the first 10-20m from the bank top. Embedded mitigation measures set out **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]** and detailed within the **Outline EPMS [REP1-106]** and **Outline Landscape and Ecological Management Plan (LEMP) [APP-283]** include the provision of protective buffer zones adjacent all watercourses at the Solar PV Sites. These undeveloped buffers encompass most of the area in which impacts are likely to arise from beaver activity and align with Step 2 of DEFRA and Natural England guidance

ExQ	Respondent	Question	Applicant's Response
			'Beavers: Managing Beaver Activities in England' (2025), to make space for beavers (Ref 27). However, beaver foraging may lead to the destruction of vegetation within riparian corridors and field margins, therefore impacting the efficacy of proposed habitat mitigation and enhancement proposals in these areas. Measures to avoid conflicts arising from beaver foraging may include use of additional tree protection, sacrificial planting, or exclusion fencing as a last resort. Measures to reduce the impacts of beaver dam creation on proposed habitat creation and enhancement, and also potentially on the Scheme infrastructure, may include the use of flow devices or dam notching to manage water levels, as well as protection of culverts to prevent damming and maintain culvert function. As a last resort, licences granted by Natural England are available to remove beaver dams or translocate beavers to alternative sites.

ExQ	Respondent	Question	Applicant's Response
			Ecological monitoring of the Solar PV Sites is prescribed within the **Outline LEMP [APP-283]** for the duration of the Scheme. Signs of beaver impacts are often visible and obvious, and it is expected that beaver presence at the Solar PV Sites will be identified relatively quickly by the monitoring ecologists, land managers / contractors, or Scheme operation and maintenance staff. It has been highlighted above how remedial measures are available to mitigate impacts of beaver where their actions may comprise the safe and effective functioning of the Scheme or affect the proposed mitigation and enhancement measures.
EB1.11	The Applicant Natural England	White-Clawed Crayfish Wiltshire Council raise specific concerns over the applicant's approach to white-clawed crayfish in their D2 submission [REP2-048]. In ES Chapter 9 Appendix 9-1 [REP1-083] the applicant has identified suitable habitat for this species at Gauze Brook and Gabriel's Well as well as a number of wet ditches directly	With reference to the three permanent culverts proposed 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 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-**

ExQ	Respondent	Question	Applicant's Response
		connected to these watercourses, thus have assumed their presence. The Applicant: You are asked to set out how your approach is consistent with Natural England's standing advice relating to white-clawed crayfish. Natural England: Please comment on the applicant's approach, citing the mitigation hierarchy and having consideration for the three new circa 6m wide permanent accesses for culverts proposed across 'wet' ditches at Lime Down D. You are also asked to comment on whether a license would be required.	**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 therefore not suitable for white-clawed crayfish, which are reliant on waterbodies holding 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]**. The rationale for not undertaking specific detailed surveys for white-clawed crayfish is

ExQ	Respondent	Question	Applicant's Response
			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 relatively limited across the Order Limits, and furthermore any such suitable habitat will be predominantly retained. The Applicant has assumed white-clawed crayfish to be present in all suitable habitat on a precautionary basis and has sought to avoid impacts on suitable habitats wherever possible. As described in **ES Volume 3, Appendix 3-2: Cable Route Construction Method Statement [APP-183],** there are a number of locations where cable installation works will employ trenchless technologies in 'Avoidance Areas'. Avoidance Areas have been embedded into the scheme where the Cable Route Corridor crosses a number of watercourses considered to be suitable for white-clawed crayfish (and thus presence has been assumed). This includes all locations where the Order Limits intersect rivers or streams categorised as statutory Main Rivers (which are likely to be of highest suitability for white-clawed crayfish) namely

ExQ	Respondent	Question	Applicant's Response
			Gauze Brook, Gabriel's Well, Pudding Brook and Byde Mill Brook. Further measures expected to contribute to avoidance of impacts on white-clawed crayfish (assuming presence in all suitable habitat) include the imposition of buffer zones from suitable habitat and good practice pollution prevention measures, both of which will seek to avoidance degradation of suitable habitat during construction and are secured within the **Outline EPMS [REP1-106]**. Where suitable habitat for white-clawed crayfish may be impacted in discrete and localised locations, for instance for temporary crossing of ditches or watercourses (outside of Avoidance Areas) within the Cable Route Corridor, the Applicant has committed to adopting measures designed to mitigate 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 1**4** of the **Outline EPMS [REP1-106].** Such measures include pre-commencement

ExQ	Respondent	Question	Applicant's Response
			inspections by a suitably qualified Ecological Clerk of Works (EcoCoW) who will oversee works affecting impacted habitat, as well as adopting biosecurity measures to prevent the spread of non-native crayfish as a result of construction activities. 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 EcoCoW. It is the Applicant's view that the assessment of potential effects on this species and the identification of appropriate avoidance and mitigation measures are in accordance with the Natural England standing advice for white-clawed crayfish (*White-clawed crayfish: advice for making planning decisions. Ref 28*).
EB1.12	The Applicant	Security Fencing – Large Mammals ES Chapter 9 [REP1-015] confirms that the security fencing would not include badger gates. Furthermore, the fencing could potentially exclude larger mammals, including brown hare.	Perimeter security fencing would comprise wire mesh and wooden post fencing as shown is Paragraph 3.3.75 and Plate 3-14 of **ES Volume 1, Chapter 3: The Scheme [APP-055]**. The Applicant confirms this type of fencing would not exclude brown hares. The Applicant also confirms that this fencing would be permeable to badgers. The base of the wire

ExQ	Respondent	Question	Applicant's Response
		Has the possibility of badgers digging under fences been considered? Furthermore, the fencing would potentially exclude larger mammals, despite the wording of ES Chapter 9 saying otherwise [REP1-015]. You are asked to detail what measures are proposed to ensure the fencing would allow for the movement of larger mammals and include details of the type of fencing to be employed.	mesh would not be buried where it meets the ground, and as such badgers will be able to either exploit natural undulations in the ground and / or will readily dig at the base of fencing to create a large enough gap to bypass fending. The Applicant's experience of badger gates on operational solar schemes is that they are rarely used, with badgers preferentially found to dig under fences or exploit natural gaps. The inspection of perimeter fencing on installation by an Ecological Clerk of Works is set out in Method Statement 2 of the **Outline EPMS (Rev 2) [REP1-106]**. However, this document has been updated at Deadline 3 (**Outline EPMS (Rev 3) [EN010168/APP/7.19]**). to clarify that this inspection will also ensure fencing remains permeable to all animals, with the exception of deer. It is noted that the BESS compounds and substations will be secured by palisade fencing, which is expected to exclude most larger mammal species. It is possible badgers may successfully attempt to burrow under this fencing, although suitable habitat will not be

ExQ	Respondent	Question	Applicant's Response
			present beyond fencing (which will typically enclose unvegetated surfaces and equipment) and thus would not be attractive to wildlife. As such burrowing animals (most notably badgers) would not be expected to frequently attempt to burrow under palisade fencing, and nor will there be a requirement to ensure this fencing is permeable to wildlife.
EB1.13	The Applicant Wiltshire Council	Security Fencing – Deer Given that the security fencing would exclude deer species both parties are asked to comment on the effect this is likely to have on unfenced areas of the proposed development, such as ecology mitigation areas. You are both also asked to comment on the potential for an increase in grazing pressures and damage to planting, and if this approach would increase the likelihood of funnelling deer into the PRoW and road networks, thereby increasing interaction with users and possibly injury or death.	A range of deer species are likely to roam widely in the local landscape, with both roe and red deer recorded ad-hoc during baseline surveys. Deer are expected to be displaced from the interior of Solar PV Sites due to the presence of perimeter security fencing. This is not expected to compromise habitat creation / enhancement measures within ecological mitigation areas. Although newly-planted young shrubs and trees within unfenced areas would be particularly susceptible to grazing pressure by deer, these will be protected through installing and maintaining protective tree guards as specified in Section 1.3 of the **Outline LEMP [APP-283]** until they have become established.

ExQ	Respondent	Question	Applicant's Response
			The Scheme design has embedded relatively wide (minimum of 15 m) unfenced buffers from all hedgerows and woodlands around the peripheries of the Solar PV Sites, which will allow wildlife, including deer, to move between favoured habitats. These unfenced buffer areas will themselves are anticipated to also provide highly suitable habitat for deer during operation, owing to the habitat creation and enhancement measures proposed for these areas, including grassland, woodland and scrub habitats. It is the Applicant's view that deer are highly likely to favour these habitat corridors for moving around the landscape, and significant increases of deer adopting the PRoW or road networks as a result of the Scheme is therefore unlikely.
EB1.14	The Applicant	Field Margins ES Chapter 9 [REP1-015] commits to avoiding works in field margins. However, you also seek to install cabling with inspection chambers in field boundaries as per ES Chapter 3 [APP-055]. You are asked to explain this potential contradiction and how field margins would be	The reference in **ES Volume 1, Chapter 3: The Scheme [APP-055]** to locating cabling and fibre communication chambers at field boundaries reflects an indicative design principle intended to reduce land take and disruption to agricultural operations where practicable. In this regard it is preferable to locate chambers towards the edges of field as

ExQ	Respondent	Question	Applicant's Response
		protected during construction and decommissioning. Works in field margins would also have the potential to adversely impact on pole cat, dormice and hedgehogs amongst other species. You are asked to explain your approach to avoiding harm and applying the mitigation hierarchy.	opposed to the centre of fields. This principle does not override or negate the embedded mitigation measures set out elsewhere within the Environmental Statement. Within the Cable Route Corridor, the ecological buffers described in **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]** will be implemented where practicable, informed by detailed design and local site conditions. Notwithstanding this, all tree and hedgerow Root Protection Areas (RPAs) will be respected, and works will be designed to avoid encroachment into RPAs in accordance with best practice arboricultural guidance. Hedgerows, hedgerow trees and associated field boundary habitats are therefore afforded protection irrespective of the final cable alignment. Where installation of cabling and fibre communication chambers is proposed close to field boundaries, this will be subject to detailed assessment at the construction stage to ensure that unacceptable ecological or arboricultural effects are avoided. This will be secured via the **Outline EPMS [REP1-106**]

ExQ	Respondent	Question	Applicant's Response
			and **Outline Arboricultural Method Statement [APP-206]**, which define working methods, exclusion zones and protection measures as appropriate. Accordingly, the Applicant does not consider that installing fibre communication chambers towards field edges represents a conflict **ES Volume 1, Chapter 3: The Scheme [APP-055]** and **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]**. With respect to potential adverse impacts on protected notable species present or potentially present at field boundary habitats, the general approach is to retain field boundary habitats wherever possible and so avoid impacts in the first instance. Applying the Precautionary Principle, the presence of protected / notable species (including dormice, polecat and hedgehogs) has been assumed to be present in all suitable field boundary habitat. Where breaches through field boundaries are required for cable installation works, the typical 25 m working width required within the cable route will be narrowed to a maximum of 12 m

ExQ	Respondent	Question	Applicant's Response
			wide as set out in section 2.4 of the **Outline EPMS [REP1-106]** which will be secured by DCO requirement. This will ensure the extent of field boundary habitat removed at boundary crossings is minimised. Where removal of field boundary habitats is unavoidable, further measures will be adopted to avoid and mitigate impacts on species present or potentially present in accordance with mitigation hierarchy. Prior to removal of all sections of field boundary habitat where required for cable installation, the habitat will be thoroughly inspected for protected / notable species and will only progress under the presence of a suitable experienced and licensed Ecological Clerk of Works (EcoCoW) and set out in, and secured by, the **Outline EPMS [REP1-106]**. This document also contains specific method statements designed to manage impacts of field boundary removal on dormice, other small mammals (including polecat and hedgehog) and other protected species which may inhabit field boundary habitat (including nesting birds). Such measures include sensitive timing of works

ExQ	Respondent	Question	Applicant's Response
			and working methodologies, and the necessary course of action should protected / notable species be encountered during works. This approach is considered appropriate and proportionate for the Scheme, particularly given the relatively small extent of field boundary habitat requiring removal in any one location.
EB1.15	The Applicant	Retention of Buildings in the Order Limits ES Chapter 9 [REP1-015] details that buildings with the potential to house bats and/ or birds in the Order limits would be retained. ES Chapter 9 [REP1-015REP1-015] details that buildings with the potential to house bats and/ or birds in the Order limits would be retained. The ExA note, however, that the demolition of buildings and structures as part of site clearance is in included in the definition of PPW in Article 2(1) of the dDCO, while Article 31(1)(b) also allows removal of buildings in connection with the construction of the development. Therefore, how can the ExA be confident that buildings with the potential to house bats and/ or birds in	The Applicant confirms that all of the existing buildings within the Order Limits recorded during baseline surveys with potential to support nesting birds and / or roosting bats (i.e. those described in Table 9-3-2 in **ES Volume 3, Appendix 9-3 Bat Survey Report [APP-200]** are proposed to be retained. However, it is possible new buildings may be erected within the Order Limits in the interim period between the DCO submission and the commencement of construction works. The Applicant therefore requires the necessary ability to demolish buildings as part of the consented Scheme. In the event construction works require the removal or alteration of any newly erected

ExQ	Respondent	Question	Applicant's Response
		the Order limits would be retained, when there is no provision within the dDCO to do so?	buildings, these will be first subject to a thorough inspection by a suitably qualified / licensed Ecological Clerk of Works (EcoCow). Depending on the findings of the inspection, further detailed surveys, mitigation measures, and / or licencing requirements will be determined as appropriate by the EcoCOW. This approach is set out in Section 5.3 of the **Outline EPMS [REP1-106]** and will be secured by DCO requirement.
EB1.16	The Applicant	Arboriculture – Bincombe Wood During the ExA's Unaccompanied Site Inspection 1 (USI1) [EV4-001] the existing single-track road adjacent Bincombe Wood was observed to be in poor condition. You are asked to detail the full extent of the works you intend to undertake to bring the track to a standard necessary to support the construction, maintenance and decommissioning phases. In addition to the above provide a more detailed account of the works to Bincombe Wood to accommodate the construction, maintenance and decommissioning stages	The Applicant notes this comment. Following design discussions and comments from Wiltshire Council the access road for construction has been realigned to avoid the use of the existing single-track road. This will remove the need for any upgrade requirements to facilitate construction traffic. The access track has been realigned. The **Design Principles and Parameters [EN010168/APP/7.4]** (Revision 3) and **Outline CEMP [EN010168/APP/7.12]** (Revision 4) have been updated at Deadline 3 to include the implementation of a 15m buffer zone for all works to North Bincombe Wood.

ExQ	Respondent	Question	Applicant's Response
		including the justification of the necessity of these works and the potential effects these could have. You should also provide details of any alternatives and avoidance measures you considered to entirely avoid adverse effects.	
EB1.17	The Applicant	**Approach to Hedgerow Removal** The ExA asks that the applicant responds to the concerns of Wiltshire Council relating to hedgerows as detailed in its LIR [REP1-137], section 16, pages 135 – 136 inclusive. In responding you are asked to consider the potential for the use of trenchless cable laying techniques to reduce the removal of hedgerows to those strictly necessary. If you cannot commit to the use of trenchless techniques to avoid or reduce harm to hedgerows then the reasoning should be explained with reference to the mitigation hierarchy.	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 and temporary hedgerow removal requirements are set out in **ES Volume 1, Chapter 9: Ecology and Biodiversity [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

ExQ	Respondent	Question	Applicant's Response
			removed). The maximum extent of hedgerow removal for a particular activity is stipulated 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 EPMS [REP1-106**] is in turn secured by Requirement 8 within Schedule 2 (Requirements) of the **Draft DCO [REP1-007]** 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 **Outline EPMS [REP1-106]** and, by extension, the extent of removal in respect of the hedgerows listed in Schedule 12 of the **Draft DCO [REP1-007**], will be subject to the approval of Wiltshire Council in consultation with the relevant statutory nature conservation body. The Applicant intends to include a

ExQ	Respondent	Question	Applicant's Response
			clarificatory footnote within Schedule 12 in the next iteration of the **Draft DCO [REP1-007**]. The Applicant has considered opportunities to minimise impacts on hedgerows throughout the iterative design process and in accordance with the mitigation hierarchy. The majority of hedgerow impacts associated with the cable route are temporary in nature and arise from the need to create suitable working widths for cable trenching and haul route. There are a relatively high number of hedgerow crossings required due to the length and linear nature of the Cable Route Corridor. However, the width of hedgerow crossings has been reduced to minimise the extent of vegetation removal required. For the Cable Route Corridor, the maximum width of hedgerow removal for cable installation works is 12 m as secured within the **Outline EPMS [REP1-105]**. Consequently, whilst a relatively high number of hedgerow crossings are required, the total length of hedgerow affected at each crossing has been kept to the minimum reasonably practicable extent.

ExQ	Respondent	Question	Applicant's Response
			The Applicant has considered the use of trenchless installation techniques, such as horizontal directional drilling (HDD), at hedgerow crossings. However, it is the Applicant's view that the use of trenchless techniques at every hedgerow crossing would not represent a proportionate or practicable solution. The appropriateness of trenchless techniques has been assessed on a location-specific basis and is generally reserved for features considered to more highly sensitive to temporary habitat removal, such as watercourses, woodlands and transport infrastructure. These are contained within 'Avoidance Areas' as shown in the **ES Volume 2, Figure 3-2-1 to 3-2-10: Key Construction Phase Features [APP-082]**. In applying the mitigation hierarchy, the Applicant has first sought to avoid impacts where practicable through route selection and design refinement. Where avoidance is not possible, impacts have been minimised through reducing crossing widths and limiting the extent of hedgerow removal required. Following cable installation, temporarily

ExQ	Respondent	Question	Applicant's Response
			removed hedgerows will be reinstated or replanted as secured through Method Statement 6 of the **Outline EPMS [REP1-105]**. The Applicant therefore considers that the proposed approach represents an appropriate application of the mitigation hierarchy. Whilst trenchless techniques are considered to appropriate in specific circumstances, their routine use solely to avoid temporary hedgerow removal is not considered necessary or proportionate given the limited extent of removal at individual crossings, which will be reinstated on completion of works. To assist with the interpretation of Article 40 of the **draft DCO (Rev 3) [EN010168/APP/3.1]**, the Applicant has included an explanatory footnote to Schedule 12 regarding the hedgerow removal powers.
EB1.18	The Applicant Wiltshire Council	**Hedgerow Heights and Density** ES Chapter 8 [APP-060] details that the applicant intends to allow hedgerows to grow up to 4.5m. Both parties:	It is the Applicant's view that no significant adverse effects on biodiversity are anticipated as a result of maintaining hedgerows at the Solar PV Sites to a height of 4.5m. For most ecological features, taller hedgerows would

ExQ	Respondent	Question	Applicant's Response
		Does this have any potential adverse impact on biodiversity? If so, please provide details. Wiltshire Council: Should replacement and new hedgerow planting have a specific density? If so, you are asked to provide details and justification.	increase the value of this habitat as general rule. Maintaining hedgerows at a height of 4.5m may conceivably impact the ground flora vegetation at the hedge base, owing to increased shading. However, plant communities directly that establish at hedge bases tend to comprise shade-tolerant plants, and the potential effects of increased hedgerow height on wider grassland margins are not anticipated to be significant as these areas will not be in permanent shade. The diverse grassland habitat proposed within field margins, as set out within the **Outline LEMP [APP-283]**, are therefore anticipated to establish successfully alongside hedgerows maintained to 4.5m height. It is possible that increases in hedgerow height from baseline levels may reduce the suitability of fields for ground-nesting bird species, such as skylark, that rely on open-sightlines when nesting. In order to compensate for the loss of suitable skylark habitat within the Solar PV Sites as a result of the Scheme, and to mitigate for the resulting loss of skylark

ExQ	Respondent	Question	Applicant's Response
			breeding territories as detailed within **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]**, nine fields within the Order Limits are proposed as ground-nesting bird mitigation habitat. These fields have been selected based on their large size, limited extent of adjacent woodland, and few potential vantage points for predators. An increase in hedgerow height from baseline levels to 4.5m is not considered to compromise the ability of these fields to deliver mitigation for ground nesting birds, as areas of ground-nesting bird mitigation habitat are proposed in fields that meet the above criteria and the height of hedgerows are thus not critical. Hedgerow management prescriptions set out within the **Outline LEMP [APP-283]** have been proposed to ensure dense hedgerow structure is also maintained, as well as height, as a gappy structure can develop within taller or established hedgerows that are managed inappropriately. A rotational cutting regime, for example, is proposed to ensure dense hedgerow structure, resulting in a

ExQ	Respondent	Question	Applicant's Response
			strengthened hedgerow network across the Solar PV Sites.
EB1.19	The Applicant	Hedgerows – Worst Case Scenario You are asked to provide details of the maximum volume of hedgerows to be lost in a worst-case scenario, this should include the effects of any road widening/ highway improvement works. If this is not possible, please explain why not.	The Applicant has provided a summary of anticipated hedgerow losses here. The following hedgerow removal requirements for the Solar PV Sites are anticipated: a. 41 new gaps for internal access measuring between 6 and 10 m each, requiring approximately 253 m of hedgerow removal in total. b. 19 locations where the Solar PV Sites will be accessed from the existing highways network. Hedgerow removal requirements are expected to require up to 18 m, depending on the presence of existing gaps in each location, and the type of access required (e.g. Abnormal Indivisible Load (AIL) access). This is expected to require approximately 74 m of hedgerow removal. A total of approximately 327 m of hedgerow is expected to be removed at the Solar PV Sites therefore, although it is acknowledged that

ExQ	Respondent	Question	Applicant's Response
			final hedgerow removal requirements are subject to detailed design. The following hedgerow removal requirements for the Cable Route Corridor are anticipated: a. 98 breaches for cable installation trench / haul routes measuring 12 m each. b. Four breaches for cable installation measuring 10 m each, where hedgerows are within Wiltshire Impact Zones for bats. c. 30 locations where up to 18 m of hedgerow removal will be required for access from the existing highways network, anticipated to total approximately 184 m of hedgerow removal. A reasonable worst-case scenario of approximately 1.4 km of hedgerow removal is required within the Cable Route Corridor therefore, although again this is subject to detailed design. The majority of this hedgerow loss within the Cable Route Corridor will be reinstated on completion of cable installation works. No hedgerow loss is anticipated to be required for road widening or any works within Highway

ExQ	Respondent	Question	Applicant's Response
			Improvement Areas. Any required work to hedgerows in these areas is expected to consist of cutting back hedgerows towards the centre-line or temporarily lowering heights of hedgerows, rather than removal of hedgerows themselves. It is the Applicant's view that the volumes provided above represent a reasonable worst-case scenario for the assessment of effects on Ecology and Biodiversity presented in **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]**. To assist with the interpretation of Article 40 of the **draft DCO [EN010168/APP/3.1]** (Revision 3), the Applicant has included an explanatory footnote to Schedule 12 regarding the hedgerow removal powers.
EB1.20	The Applicant	Access Points – Mitigation Measures Works Plan Sheet 9 [REP1-005] shows an access into Works Number 5A(v) via access number 102 [APP-010]. Although this is an existing access it needs to be improved to cater for construction traffic, which would result	In relation to the selection of areas for temporary construction compounds, Section 4.8 of **ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056]** explains the approach that was taken. At the Preliminary Environmental Information Report stage, a desk-based exercise was undertaken for the

ExQ	Respondent	Question	Applicant's Response
		in the removal of hedgerows, dry stone walling and a mature tree. You are asked to detail what design alternatives were considered to avoid and reduce damage to ecologically important features at this access, for example could access 101 have been used to allow for a turning area into 102 to avoid damage to ecological features? Furthermore, you are asked to detail your approach, with reference to the mitigation hierarchy and providing evidence, to selecting areas for construction compounds and access points generally, including widening and other works, to avoid and minimise damage at these locations to ecologically sensitive features.	siting of temporary construction compounds. It was assumed that the compounds would be approximately 100m X 100m and that at least one compound would be required within each Solar PV Site in addition to parameters being established to avoid impacts, in accordance with the mitigation hierarchy. The parameters were as follows: a. The compound should be located close to the proposed access to the Solar PV Sites to limit the construction of temporary access tracks; b. The compounds should not be within 250 m of residential receptors; c. The proposed compound areas should not be at risk of flooding from rivers or surface water; d. The compound areas should not be located in areas of archaeological interest identified through geophysical surveys; and e. The proposed compound area should not be within the buffers defined for the development of the Scheme Layout. Plate 4-5 of **ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-**

ExQ	Respondent	Question	Applicant's Response
			056] shows the locations (in yellow) that were identified for further consideration following the desk-top assessment process. Following the identification of the initial compound locations, these locations were refined to, where practicable, avoid or reduce potential environmental effects, in accordance with the mitigation hierarchy. This included the following refinements and changes: a. Locations were refined to avoid local visual impacts and disturbance; b. Locations were refined to increase distance to residential receptors; c. Locations were refined to limit the construction of temporary access tracks; d. An existing farm storage area in Lime Down E was identified for use as a compound and therefore this was chosen as an appropriate location given its existing use; e. The location of compounds in the context of all the Solar PV Sites were considered to minimise movements of construction materials within the Solar PV Sites and across local roads; and

ExQ	Respondent	Question	Applicant's Response
			f. The compound within Field C22 was enlarged to 120 m by 120 m to avoid the need for a further compound within Lime Down C. For the DCO application, the proposed temporary construction compounds took account of comments provided at the Statutory Consultation in relation to siting which emphasised the requirement to set back the locations from trees, hedgerows and watercourses. As a result, set back distances from these features have been maximised. In relation to the location of access points across the DCO area the following across the following parameters were followed: a. Where possible existing field access locations were chosen to reduce any potential environmental impact of any physical junction works; b. Access locations were chosen to provide direct access into cable route or PV sites to reduce the potential for impacts on any additional routes

ExQ	Respondent	Question	Applicant's Response
			c. Where existing access junctions were not available to provide direct access, the use of mitigation measures such as banksmen are proposed to reduce environmental impacts; d. Where new access junctions are provided along the cable route they will be returned to their existing layout after the temporary construction phase. e. Existing field accesses along the cable route will be returned to their layout after the construction period.

2.9 Flood Risk, Hydrology and Water Resources

ExQ	Respondent	Question	Applicant's Response
FHW1.1	The Applicant Wiltshire Lead Local Flood Authority (The LLFA)	**Policy Compliance - Larger PV Panels** Paragraph 2.10.84 of NPS EN-3 (2023) states: 'Where a Flood Risk Assessment has been carried out this must be submitted alongside the applicant's ES. This will need to consider the impact of drainage. As solar PV panels will drain to the existing ground, the impact will not, in general, be significant.' The ExA note the applicant's need for flexibility leading to the lack of confirmation regarding the type of PV panels to be used. However, the use of larger PV panels, never used in the UK before, introduces uncertainties to their hydrological impact which cannot currently be supported one way or another with evidence on the ground. The applicant's assessment of Hydrology, Flood Risk and Drainage (Chapter 11 of the ES [APP-063] and supporting appendices seem to assume that the hydrological effects of different PV panels would be the same, regardless of panel dimensions. SLD submitted detailed analysis and research regarding surface water	The Applicant considers that the use of larger or tracking PV panels would not give rise to significant hydrology, flood risk or drainage effects beyond those assessed for the Scheme. The final panel specification will remain within the design parameters assessed in **ES Volume 1, Chapter 3: The Scheme [APP-055]** and **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP1-018]**. The Applicant accepts that panel size, height and tracking behaviour can alter the local redistribution of rainfall within a field, including drip-line location, local concentration beneath panel edges and the height from which water falls. These are localised rainfall redistribution effects. They do not alter the fact that the panels are elevated above ground, drain to the existing ground beneath and between the arrays, and are not connected to a sealed drainage network. This is consistent with paragraph 2.10.84 of NPS EN-3 (Ref 32).

ExQ	Respondent	Question	Applicant's Response
		redistribution and concentration along the panels, the creation of drip lines, increased kinetic energy of water falling from the panels, potential soil erosion, significant reduction of evaporation and increase of soil moisture [REP1-174, REP1-175, REP1-177 and REP1-183]. This highlights potentially different impacts of larger PV panels which, coupled with the soil's sensitivity to compaction and low permeability, could lead to faster displacement of surface water runoff and potential increase of flood risk on and off site. The Applicant: As the ES does not include site specific analysis of the impact of different types of PV panels, the applicant is asked to explain their potential effect to demonstrate that they would not have significant impacts. The LLFA: The LLFA is asked to submit comments on the documentation provided by SLD (referenced above).	The distinction that matters for flood risk is between redistribution of rainfall within a field and generation of additional runoff at the field boundary. Panels do not add water to the field and do not remove the ground that receives it. For redistributed water to leave the field as increased runoff, it must travel across the ground surface and reach a field boundary or watercourse as connected overland flow, at a greater rate or volume than under the existing condition. Whether that occurs is governed by ground cover, soil condition, soil compaction, erosion risk and surface flow connectivity. These are the variables controlled through the embedded mitigation and secured management measures. The mechanisms identified by SLD in **[REP1-174, REP1-175, REP1-177 and REP1-183]** are recognised risk pathways, but they are conditional. They may occur where ground cover is degraded, soils are compacted, or connected bare-soil flow paths are allowed to form. They are not unavoidable consequences of larger panels. They are controlled through the **Outline CEMP [REP1-097]**, **Outline SRMP [APP-280]**, **Outline LEMP [APP-283]** and operational

ExQ	Respondent	Question	Applicant's Response
			management controls, including controls on trafficking, soil compaction, reinstatement, vegetation establishment and maintenance, and the avoidance of sustained bare ground beneath and between the arrays. Low soil permeability and sensitivity to compaction are baseline characteristics of parts of the Order Limits and are not effects created by the panels. The assessment therefore targets the relevant change pathways: avoiding deterioration in ground condition during construction and operation, maintaining and improving vegetated cover, and preventing the creation of connected preferential flow routes. The principal construction-stage runoff risk is soil compaction, which is addressed through secured construction and soil management controls. The Applicant has provided a detailed response to the LLFA's related modelling position in **Applicant's Response to Lead Local Flood Authority on Hydraulic Modelling Requirements [REP2-045]**. That response explains why field-scale hydraulic modelling of the panelled areas is neither necessary nor proportionate, and why the

ExQ	Respondent	Question	Applicant's Response
			appropriate control is the secured management of the ground conditions that govern runoff response in practice. A field-scale model could only be produced by assuming future values for runoff coefficient, surface roughness, soil compaction, vegetation condition and surface flow connectivity across the operational lifetime. These are management-dependent variables, not fixed design parameters. Modelling them would imply a level of certainty in future ground condition that the underlying mechanism does not support. The Application instead secures the controls that govern those variables in practice. The Applicant also notes that the request for field-scale quantitative hydrological assessment of the panelled areas does not reflect the pre-application consultation position. As set out in **Applicant's Response to Lead Local Flood Authority on Hydraulic Modelling Requirements [REP2-045]**, the assessment approach, including the distinction between panelled areas, impermeable infrastructure and location-specific fluvial risk, was discussed with the LLFA and its technical adviser before submission and was supported

ExQ	Respondent	Question	Applicant's Response
			in principle. The request for field-scale quantitative hydrological assessment was first raised following submission. The Applicant does not accept SLD's reduced evaporation argument as a basis for concluding that the Scheme would increase flood risk. Flood peaks are governed by rainfall intensity, antecedent conditions, infiltration capacity, runoff generation and hydrological connectivity during individual storm events. SLD's calculation is an annualised water balance derived from exported electrical energy. That does not demonstrate a material increase in design storm runoff or downstream flood risk. Design events are already assessed using conservative antecedent conditions and climate change allowances. Formal impermeable infrastructure, including substations, BESS compounds, hardstanding and access tie-ins, has been assessed separately and quantitatively through the FRA and Drainage Strategy suite **[REP1-038 to REP1-054]**, with attenuation and controlled discharge to greenfield runoff rates provided where required. On this basis, the Applicant

ExQ	Respondent	Question	Applicant's Response
			considers that the potential hydrological effects of different panel types, including larger and tracking panels, have been appropriately assessed and controlled, and would not give rise to significant hydrology, flood risk or drainage effects on-site or off-site.
FHW1.2	The Applicant	**Policy Compliance - Signposting** The ExA note the contents of ES Volume 3, Appendix 5-1 National Policy Statement Requirements [APP-186]. However, SLD's submission [REP1-174] includes a list of flood risk assessment requirements in pages 20-23. The applicant is asked to provide a detailed response to this table, but if the information is already contained within the application documents, please signpost the ExA to the specific relevant part of the documents, rather than just cite the document reference.	The Applicant does not agree with SLD's conclusion that the Flood Risk Assessment meets only 6 of the 23 minimum requirements of NPS EN-1 paragraph 5.8.15 (Ref 12). SLD applies a binary pass or fail scorecard that does not reflect the proportionate, risk-based and mechanism-specific nature of the FRA process, or the solar-specific policy context of NPS EN-3 (Ref 32). Many of SLD's "No" findings are not findings that a requirement is unaddressed. They are objections to the level of detail provided at DCO stage, or a request for whole-Scheme dynamic hydraulic modelling. The Applicant's position, set out in the **Applicant's Response to Lead Local Flood Authority on Hydraulic Modelling Requirements [REP2-045]** and in response to **FHW1.1** and **FHW1.5**, is that hydraulic modelling is applied where the

ExQ	Respondent	Question	Applicant's Response
			mechanism and level of fluvial interaction justify it. This includes detailed modelling at Gauze Brook at Lime Down D and further modelling being progressed for Gabriel's Well at Lime Down E2. Whole-Scheme dynamic hydraulic modelling of panelled areas is not required by NPS EN-1 and would not provide a reliable or proportionate basis for assessment. The FRA assesses flood risk both to and from the Scheme. The Scheme is not predicted to increase off-site flood risk because formal impermeable infrastructure is attenuated and controlled, while panelled-area runoff is managed through ground condition, vegetation cover, soil compaction control and surface flow connectivity controls, as explained in response to **FHW1.1**. A point-by-point response to SLD's table is provided below, with signposting to the relevant application documents.
FHW1.3	The Applicant The LLFA	**Flood Risk Assessment – Quantification of surface water and SUDS** The outline drainage strategies [APP-210 to APP-218] provide no or little quantification of the impact of the proposed development on surface water runoff. This has been	The Applicant notes the ExA's question. The Applicant does not agree that the submitted FRA and Drainage Strategy suite provides no or little quantification of the surface water drainage effects of the Scheme. The assessment has been undertaken on a flood

ExQ	Respondent	Question	Applicant's Response
		consistently raised as a concern by SLD, and it is included in the SoCG as under discussion with Wiltshire Council [REP2-025]. The LLFA includes in [REP1A-017] information regarding Section 19 investigations for Whitley and Beanacre. Its conclusions are that flood risk is pathway-driven and catchment-based (rather than limited to mapped fluvial floodplains) and that ditch networks and overland flow routes act as conveyors. The outline drainage strategies do not include mapping of ditch networks or overland flow routes. Furthermore, the proposed development would introduce many impermeable elements (PV panel supports, smaller electrical infrastructure associated with PV panels, substations, BESS area, etc) which could potentially have important cumulative impact if not addressed on each site. The ExA note that the access tracks would be permeable but, due to soil compaction, they could also become impermeable. The applicant proposes to use sustainable drainage systems (SUDS) and current site drainage to reduce surface water runoff to agreed rates. However, NPS EN-1 (paragraph 5.8.15, page 129) clearly requires	mechanism-specific basis. Quantitative assessment has been provided where the Scheme introduces formal impermeable infrastructure, and a connected drainage system is required. The clearest example is **ES Volume 3, Appendix 11-6: Flood Risk Assessment and Drainage Strategy - Lime Down D / BESS [REP1-047]**, which identifies the proposed impermeable area, greenfield runoff rates, restricted discharge rate, attenuation storage volume, SuDS options, exceedance routing, treatment and maintenance provisions. The **FRA and Drainage Strategy Covering Report [REP1-037]** also sets out the wider drainage principles for the Scheme, including access tracks, smaller electrical infrastructure, soil compaction risk, overland flow paths and construction drainage controls. The site-specific **FRA and Drainage Strategy appendices [REP1-039, REP1-041, REP1-043, REP1-045, REP1-047, REP1-049 and REP1-051]** assess flood risk and drainage matters at each Solar PV Site, with the Cable Route Corridor addressed in **[REP1-053]**.

ExQ	Respondent	Question	Applicant's Response
		the Applicant to *'set out (approximately) the existing rates and volumes of surface water run-off generated by the site'*. The lack of quantification of the volume of water to be attenuated and lack of information regarding the SUDS to be implemented do not demonstrate that flood risk would not be increased and can be managed. We note the applicant's response to the LIR [REP2-038] and Response to D1A Submissions [REP2-040] which state that existing topography, drainage features, overland flow routes, surface water flood risk and watercourse connectivity across solar PV sites have informed the assessment. However, as outline drainage layouts or mapping of existing drainage features have not been submitted, it remains unclear how SUDS would interact with existing drainage features and other proposed mitigation measures. The Applicant is asked to: Provide a high level calculation of the effect of all impermeable areas for each site, setting out the existing rates and volumes of surface	The Applicant accepts that the ExA has requested further consolidation and presentation of this information. The Applicant will therefore update the relevant site-specific **Flood Risk Assessment and Drainage Strategy** appendices and the relevant **ES Volume 2 Figures 11-1 to 11-8 [APP-135 to APP-142]** to provide the additional high-level drainage information requested by Deadline 4. The Applicant's position on panelled areas The Applicant's position remains that the panelled areas should not be treated as impermeable catchments. Solar PV panels are elevated above ground, drain to the existing ground beneath and between the arrays, and do not interrupt ground-level surface water flow routes. This is consistent with NPS EN-3 paragraph 2.10.84 and is explained further in response to **FHW1.1**. The Applicant has provided a detailed rebuttal of the LLFA's request for field-scale hydraulic modelling in the **Applicant's Response to Lead Local Flood Authority on Hydraulic Modelling Requirements [REP2-045]**. That

ExQ	Respondent	Question	Applicant's Response
		water run-off generated by the site and to provide information regarding the type of SUDS and/or any other drainage features that could be used to drain the site. Provide outline drainage layouts for each site showing potential SUDS connections with existing drainage features and exceedance routing. Include any other information required by NPS EN-1, paragraph 5.8.15, bullet point 11 (i to x). Add all SUDS features to the figures within the Landscape and Ecology Mitigation plans [REP1-029 to REP1-032] and provide an explanation of the multi-use purpose of each SUDS feature and how they contribute to water management and ecology. The LLFA: The ExA note the LLFA request for further hydraulic modelling in the Council's LIR [REP2-025]. The LLFA is asked to confirm if the information requested by questions 1 to 4 above would address the key sensitivities listed in	response explains why treating panelled areas as connected impermeable hardstanding would not be appropriate or proportionate. The Applicant's position is also supported by the peer-reviewed evidence base already provided to the LLFA and included in the **Applicant's Response to Lead Local Flood Authority on Hydraulic Modelling Requirements [REP2-045]**. That evidence does not support treating panelled areas as connected impermeable hardstanding. It shows that panels can redistribute rainfall locally, including at drip lines, but whether this becomes a material runoff issue at the field boundary depends on ground cover, soil condition, compaction, slope, surface roughness and hydrological connectivity. Those are the variables controlled through the Scheme design, the **Outline CEMP [REP2-019]**, the **Outline SRMP [APP-280]**, the **Outline LEMP [APP-283]** and the detailed drainage design secured through **Requirement 11: Surface Water Drainage** of the **Draft DCO [REP1-007]**.

ExQ	Respondent	Question	Applicant's Response
		paragraph 2.21 of [REP1A-017] and negate the need for further modelling in principle. If the answer is negative, the LLFA is asked to explain why not and what further information is needed considering the need for proportionality. If the answer is affirmative, the LLFA is asked to confirm if this information could be included in the outline management plans secured through the dDCO. If so, the LLFA is asked to explain which management plans and provide the proposed wording changes.	The Applicant notes that SLD has consistently advanced concerns regarding surface water runoff from panelled areas. Those concerns have been considered and responded to in the Applicant's submissions during the Examination, including in response to **FHW1.1** and **FHW1.2**. The Applicant also notes that the LLFA did not request field-scale hydraulic modelling of panelled areas during pre-application consultation. The Applicant's assessment approach was discussed with the LLFA and its technical adviser before submission and was supported in principle. The request for field-scale quantitative assessment of panelled areas was raised following submission and is addressed in the **Applicant's Response to Lead Local Flood Authority on Hydraulic Modelling Requirements [REP2-045]**. <u>Drainage ditches, watercourses and overland flow routes</u> The Applicant agrees that flood risk can be pathway-driven and catchment-based, and that ditch networks, culverts and overland flow routes can act as conveyance pathways. The

ExQ	Respondent	Question	Applicant's Response
			submitted assessment does not assume that flood risk is limited to mapped fluvial floodplain. These matters have been considered throughout the submitted documents through review of topography, LiDAR, Environment Agency surface water flood risk mapping, watercourse connectivity, ordinary watercourses, existing drainage features and identified overland flow routes. The submitted **ES Volume 2, Figures 11-1 to 11-8 [APP-135 to APP-142]** already provide baseline mapping of fluvial flood risk, ordinary watercourses, EA Main Rivers and mapped surface water flood risk across the Solar PV Sites and Cable Route Corridor. To address the ExA's request, the Applicant will submit revised versions of the relevant **ES Volume 2, Figures 11-1 to 11-8 [APP-135 to APP-142]** at Deadline 3 with additional drainage information added where relevant and proportionate. The revised figures will show, where applicable:

ExQ	Respondent	Question	Applicant's Response
			a. existing ordinary watercourses, ditches and drainage features where that detail is available; b. mapped surface water flood risk and overland flow routes; c. fixed or committed infrastructure with potential drainage implications; d. indicative permanent SuDS features or drainage zones where these are sufficiently fixed; e. conceptual drainage layouts for the BESS and substation locations, including indicative attenuation, discharge, containment or isolation principles where relevant; and f. indicative exceedance routing principles. g. High-level calculations and treatment of Scheme components The Applicant will update the relevant site-specific **Flood Risk Assessment and Drainage Strategy** appendices at Deadline 4 to provide high-level calculations for the fixed or committed elements of the Scheme shown on the submitted plans, where those elements have the potential to affect surface water

ExQ	Respondent	Question	Applicant's Response
			drainage. This includes, as relevant, access tracks, substation and BESS access tracks, conversion units / 33 kV sub-distribution switch rooms, substation infrastructure, highway improvement areas and other permanent infrastructure. The updates will distinguish between: a. infrastructure requiring formal drainage design; b. infrastructure that is permeable by design; c. infrastructure that is too small, dispersed or disconnected to materially alter runoff characteristics; and d. panelled areas, which are not treated as impermeable catchments. Solar PV panels and their mounting structures do not materially increase surface water runoff volumes. The panels are elevated above ground, drain to the vegetated ground beneath and between the arrays, and are not connected to a sealed drainage network. The mounting structures would normally comprise discrete metal posts driven directly into the ground. In those locations, the

ExQ	Respondent	Question	Applicant's Response
			impermeable footprint is limited to the cross-sectional area of the posts at ground level. Although the total number of posts increases with the extent of the panelled area, they remain widely dispersed across a proportionately larger area of vegetated ground and do not form a connected impermeable catchment. Smaller electrical infrastructure, including conversion units, transformers, switch rooms and associated pads, has been considered. Where these elements are fixed or committed at this stage, they will be included in the updated site-specific **Flood Risk Assessment and Drainage Strategy** appendices. These features are small, dispersed and remote from one another. They do not create a connected impermeable catchment requiring site-wide attenuation. Where required, proportionate local drainage measures will be incorporated into the detailed drainage design to prevent local ponding, erosion, preferential flow or lateral migration of surface water, and to maintain existing drainage connectivity. These may include gravel trenches, filter drains, shallow cut-off drains, swales, level spreaders

ExQ	Respondent	Question	Applicant's Response
			or equivalent measures, depending on the final infrastructure location, levels, ground conditions and receiving drainage features. This principle will be included in the relevant Outline Drainage Strategy sections submitted at Deadline 4, with the final measures secured through Requirement 11 of **draft DCO (Rev 2) [REP1-007].** The Solar PV Site access tracks will generally be formed of hardcore or gravel over a levelling layer and will be designed to remain permeable where practicable. The access points and associated tracks serving the substations and BESS have been assessed on a reasonable worst-case basis as asphalt and will be included within the relevant formal drainage calculations and detailed drainage design. Where any other access track section is confirmed at detailed design to be impermeable, it will also be incorporated within the formal drainage design or otherwise designed to ensure no increase in runoff from the Scheme. Where tracks intersect local flow paths, cross-drainage, shallow swales, grips, check

ExQ	Respondent	Question	Applicant's Response
			features or equivalent measures will be provided where required to maintain existing conveyance and avoid preferential flow paths. The construction-stage risk that tracks or trafficked areas could become compacted is recognised. This is controlled through the **Outline CEMP [REP2-019]**, **Outline SRMP [APP-280]** and detailed CEMP, including routing of construction traffic, soil moisture controls, reinstatement, decompaction and reseeding. <u>BESS, substations and formal hardstanding</u> The larger built infrastructure, including the BESS, substations, compounds and other formal hardstanding, has been sequentially sited having regard to flood risk and existing drainage features, and located outside areas of highest flood risk and key flow paths wherever practicable through the design process. Where these elements introduce formal impermeable area, they will be drained through engineered drainage systems designed to attenuate and control runoff to appropriate

ExQ	Respondent	Question	Applicant's Response
			discharge rates. These systems will include SuDS and, where relevant, lined, treated and isolatable drainage to address water quality, spill and firewater risk. The detailed design will be secured through **Requirement 11: Surface Water Drainage** of the **Draft DCO [REP1-007]**. For the BESS and substation locations, conceptual drainage layouts will be provided in the revised site-specific **Flood Risk Assessment and Drainage Strategy** appendices. These will show, at a concept level, the proposed drainage arrangement, indicative SuDS or attenuation features, potential discharge points, containment or isolation principles where relevant, and exceedance routing. This reflects that the BESS and substation areas are the principal formal impermeable infrastructure requiring engineered drainage. <u>Wider Solar PV Sites</u> For the wider Solar PV Sites, the revised **ES Figure 11 series** and site-specific **Flood Risk Assessment and Drainage Strategy**

ExQ	Respondent	Question	Applicant's Response
			appendices will explain how existing drainage features, watercourses, ditches and overland flow routes have informed the drainage strategy. They will not treat panelled areas as impermeable catchments. Where final infrastructure locations, levels or drainage details remain subject to detailed design, the appendices will explain the drainage principles that will apply, including maintaining existing flow routes, avoiding preferential flow paths, using local drainage measures where required, and discharging back to adjacent vegetated ground or existing drainage features in a controlled manner. <u>Landscape and Ecology Mitigation Plans</u> The Applicant does not propose to update **ES Volume 2, Figure 3-4: Landscape and Ecology Mitigation Plans [REP1-029 to REP1-032]** at this stage. The location and form of permanent SuDS features, and drainage zones are not sufficiently fixed to be shown without prejudging the detailed drainage design.

ExQ	Respondent	Question	Applicant's Response
			The Landscape and Ecology Mitigation Plans already identify watercourse buffers, retained vegetation and landscape and ecological mitigation areas. These will inform the integration of permanent drainage features at detailed design, where appropriate and consistent with the landscape and ecological mitigation objectives. The final location and form of any permanent SuDS features will be confirmed through the detailed drainage strategy secured under Requirement 11 of **draft DCO [REP1-007]** and coordinated with the detailed Landscape and Ecological Management Plan. Temporary construction drainage will not be fixed on those plans because it will depend on sequencing, weather, ground conditions and contractor methodology. It will instead be controlled through the detailed CEMP and Water Management Plan, in accordance with the **Outline CEMP [REP2-019]** and **Outline SRMP [APP-280]**. The multifunctional purpose of the permanent SuDS features will include, as applicable, attenuation, conveyance, energy dissipation,

ExQ	Respondent	Question	Applicant's Response
			erosion control, water quality treatment, sediment management, biodiversity enhancement and integration with landscape planting. Swales and filter drains would typically provide conveyance, interception, slowing of flow and treatment. Basins or ponds would provide attenuation, settlement, exceedance storage and biodiversity value. Level spreaders, check features and vegetated buffers would manage local discharge back to ground, reduce erosion and maintain diffuse flow. Lined or isolatable drainage would be used where water quality or containment risk requires it, including for BESS and substation infrastructure. NPS EN-1 paragraph 5.8.15, bullet 11(i) to (x) The information already submitted, and to be consolidated within the revised site-specific **Flood Risk Assessment and Drainage Strategy** appendices and revised **ES Volume 2, Figures 11-1 to 11-8 [APP-135 to APP-142]**, addresses the relevant parts of NPS EN-1 paragraph 5.8.15, bullet 11(i) to (x).

ExQ	Respondent	Question	Applicant's Response
			It will set out the existing surface water drainage context, existing runoff rates and volumes at a high level for fixed or committed impermeable infrastructure, the proposed drainage hierarchy, the types of SuDS and drainage features available, the proposed discharge principles, the relationship with existing drainage features, the multifunctional role of SuDS, exceedance routing, maintenance principles and the controls needed to ensure runoff from the completed development does not increase flood risk elsewhere. <u>Response to LLFA paragraph 2.21 sensitivities</u> The Applicant considers that the information to be provided addresses the key sensitivities listed by the LLFA at paragraph 2.21 of **[REP1A-017]**. Established overland flow pathways will be maintained. Runoff rates and volumes from formal impermeable infrastructure will be controlled through the embedded drainage principles and detailed drainage design secured by the DCO.

ExQ	Respondent	Question	Applicant's Response
			Directly connected downstream receptors are not predicted to be subject to increased flood risk. This is because the Scheme does not treat the panelled areas as connected impermeable catchments, larger impermeable infrastructure has been sited having regard to flood risk and existing drainage features, and formal impermeable infrastructure will be drained, attenuated and controlled where required. The submitted FRA suite has considered the relevant catchment and pathway mechanisms through review of local topography, LiDAR, WFD catchments, mapped surface water flood risk, ordinary watercourses, land drainage ditches, flow directions, Environment Agency Product Data and, where proportionate, Manning's open-channel calculations. The revised site-specific **Flood Risk Assessment and Drainage Strategy** appendices and revised **ES Volume 2, Figures 11-1 to 11-8 [APP-135 to APP-142]** will make this clearer by showing how existing drainage features, ditches, watercourses, overland flow routes

ExQ	Respondent	Question	Applicant's Response
			and proposed drainage measures relate to the fixed or committed Scheme infrastructure. Highway drainage constraints will be addressed where relevant to highway improvement areas, access tracks, existing culverts, receiving drainage features and detailed drainage design. The conceptual drainage layouts for the BESS and substation locations will also show, at a concept level, the proposed drainage arrangement, attenuation, discharge, containment or isolation principles where relevant, and exceedance routing. <u>Summary of proposed updates</u> In summary, the Applicant proposes to address the ExA's request by: Updating the relevant site-specific **Flood Risk Assessment and Drainage Strategy** appendices (Updates in relation to FHW1.4, 5, 9 Deadline 3; Updates in relation to FWH1.3 Deadline 4); Submitting revised **ES Volume 2, Figures 11-1 to 11-8 [APP-135 to APP-142]** with the

ExQ	Respondent	Question	Applicant's Response
			additional drainage and overland flow information described above (Deadline 3); Providing conceptual drainage layouts for the BESS and substation locations (Deadline 4); and Providing high-level calculations for fixed or committed impermeable infrastructure where those elements have the potential to affect surface water drainage (Deadline 4). The detailed drainage design will remain secured through **Requirement 11: Surface Water Drainage** of the **Draft DCO [REP1-007]**. The Applicant does not consider further field-scale hydraulic modelling of the panelled areas to be necessary, proportionate or technically useful.
FHW1.4	The Environment Agency The Applicant	**Flood Risk Assessment – Flood Zone 3b and Floodplain Impacts.** The LLFA considers in Wiltshire Council's LIR [REP1-137] that Flood Zone 3b needs to be	The Applicant notes the ExA's question. The Applicant confirms that sensitive electrical infrastructure within areas of modelled flood interaction will either be located outside the design flood extent or raised with a minimum

ExQ	Respondent	Question	Applicant's Response
		defined for effective planning, design and operation of site. The applicant explains in its D2 submission [REP2-045] and response to the LIR [REP2-038] that detailed hydraulic modelling for the Gauze Brook and the Unnamed river has been undertaken at Lime Down D, and that at Lime Down E2 further hydraulic modelling is being progressed in relation to Gabriel's Well to define local flood behaviour, including Flood Zone 3b where relevant. We understand that the details of the modelling are currently with the Environment Agency (EA) for review. The Environment Agency: The EA is asked to explain if there are any concerns regarding the parameters and outputs of the modelling done so far and the modelling being progressed by the applicant for Lime Down D and E2. The EA is asked to explain if the information submitted by SLD, specifically in document [REP1-176] could support an extension to	0.6 m freeboard above the design flood level, including climate change. For Solar PV Panels, sensitive electrical equipment mounted on the panels will also 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. This position will be clarified by Deadline 3 in **ES Volume 3, Appendix 11-6: Flood Risk Assessment and Drainage Strategy - Lime Down D / BESS [REP1-047]** and **ES Volume 3, Appendix 11-8: Flood Risk Assessment and Drainage Strategy - Lime Down E2 [REP1-051]**. The Applicant will continue engagement with the Environment Agency on any comments arising from its review of the hydraulic modelling.

ExQ	Respondent	Question	Applicant's Response
		Flood Zone 3b in Lime Down D and if so, to which fields. The Applicant: The applicant is asked to confirm the freeboard allowances requested by the EA in their document [REP2-049]	
FWH1.5	The LLFA The Environment Agency The Applicant	**Flood Risk Assessment – Manning Calculations Results** Figure 1 (page 10) of SLD's representation [REP1-174] shows the flows calculated using Manning's open channel flow formula. It is in section 'Fluvial Flooding' which discusses in detail the information submitted in the flood risk assessments submitted by the applicant. All Parties: The LLFA, the EA and the applicant are asked to submit a response to the analysis done by SLD and its conclusions. In your response, please set out the implications for the interaction with surface water flood risk and the potential impact to on site and off site flood risk.	The Applicant notes the ExA's question. The Applicant does not agree with SLD's interpretation of the Manning calculations or with the conclusions drawn from Figure 1 of **SLD's Written Representation, Appendix F1 [REP1-174]**. The Manning calculations were undertaken as a proportionate screening exercise for smaller ordinary watercourses and land drainage features where detailed hydraulic modelling was not necessary or proportionate. The Applicant started from the Environment Agency's published flood mapping, including the 0.1% AEP surface water mapping, which was used as a conservative indication of the wider potential flood extent. The Manning calculations were then used to estimate indicative flood levels for the 1% AEP event

ExQ	Respondent	Question	Applicant's Response
		<u>The Applicant:</u> Paragraph 25 of the SLD representation refers to inconsistencies/mistakes between references to the 0.1% Annual Exceedance Probability (AEP) and the 1% AEP events in the flood risk assessments. The applicant is asked to review, confirm and address any inconsistencies in the flood risk assessments.	plus climate change at selected smaller watercourses and drainage features, using LiDAR-derived cross-sections, channel and floodplain roughness assumptions, and local slope. In simple terms, the calculations were used to check whether the assessed 1% AEP plus climate change flood level would be below, broadly consistent with, or materially greater than the conservative 0.1% AEP mapped extent. Where the 1% AEP plus climate change result was below or broadly analogous to the 0.1% AEP mapping, the Applicant considered that the Environment Agency mapping provided an appropriately conservative basis for assessment. The Manning calculations did not identify locations where the smaller ordinary watercourses or land drainage features would give rise to a significant flood risk to the Scheme, or where the Scheme would be likely to increase off-site flood risk through displacement of floodwater or interruption of existing flow routes. They also informed the micro-siting of infrastructure by helping to identify local flood flow pathways, indicative flood levels and areas where infrastructure should be avoided or managed

ExQ	Respondent	Question	Applicant's Response
			through embedded mitigation. They were not intended to be a full dynamic hydraulic model of the catchments and were not presented as such. SLD's Figure 1 is not a new flood model. It takes selected flow figures from the Applicant's Manning calculations and compares them with flows observed or reported elsewhere. That is not a like-for-like comparison. Flood flow depends on where the flow is measured, the size and slope of the catchment, the rainfall event, the route the water takes and the capacity of the channel. A flow calculated for one ditch or watercourse cannot therefore be directly compared with a flow reported from another location or event. The comparison does not show that the FRA has underestimated flood risk. The Applicant does not consider that this is a reliable basis for concluding that the FRA underestimates flood risk or that the Scheme would increase flood risk. The Manning-derived values are indicative equivalent flows associated with broad cross-sections and mapped flood levels. They should not be read as measured point

ExQ	Respondent	Question	Applicant's Response
			flows in small channels or directly compared with gauged river flows without accounting for catchment area, rainfall event, routing, channel capacity and local hydraulic conditions. The relevant conclusion from the Manning calculations is that they assist in understanding existing watercourse and drainage pathway flood behaviour. They do not demonstrate that the Scheme would cause or worsen flooding. The calculations were used to test the relationship between conservative mapped flood extents, indicative 1% AEP plus climate change water levels and the local drainage features that interact with the Order Limits. That exercise did not identify locations where those smaller features would give rise to a significant flood risk to the Scheme, or where the Scheme would be likely to increase off-site flood risk through displacement of floodwater or interruption of existing flow routes. The calculations also helped inform the micro-siting of infrastructure and the identification of locations were embedded mitigation, such as maintaining flow routes, avoiding changes to ground levels or preserving drainage

ExQ	Respondent	Question	Applicant's Response
			connectivity, would be required. The results do not demonstrate a material increase in flood risk caused by the Scheme. In relation to interaction with surface water flood risk, the Applicant does not agree that SLD's analysis demonstrates an increased on-site or off-site flood risk. The Manning calculations relate to existing channels, ditches and flow pathways. They do not show that solar PV panels would increase runoff volume, obstruct ground-level overland flow routes, or convert the panelled areas into connected impermeable catchments. Those matters are addressed in response to **FHW1.1**, **FHW1.3** and in **Applicant's Response to Lead Local Flood Authority on Hydraulic Modelling Requirements [REP2-045]**. The Applicant's position remains that surface water flood risk has been assessed on a mechanism-specific basis, as set out in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP1-017]**, the **FRA and Drainage Strategy Covering Report [REP1-037]** and the site-specific **FRA and Drainage Strategy appendices [REP1-039, REP1-041,**

ExQ	Respondent	Question	Applicant's Response
			REP1-043, REP1-045, REP1-047, REP1-049, REP1-051 and REP1-053]. Solar PV panels drain to the ground beneath and between the arrays. Panel supports are discrete and do not represent a material increase in connected impermeable area. Access tracks are proposed to be permeable where practicable and will be managed to avoid preferential flow paths. Where any access track section is confirmed at detailed design to be impermeable, it will be incorporated within the formal drainage design or otherwise designed to ensure no increase in runoff from the Scheme. The principal construction-stage runoff risk is soil compaction, which is controlled through the **Outline CEMP [REP2-019]**, **Outline SRMP [APP-280]** and detailed CEMP and SRMP. Formal impermeable infrastructure, including the BESS, substations and associated hardstanding, will be drained, attenuated and controlled through engineered drainage systems secured by **Requirement 11: Surface Water Drainage** of the **Draft DCO [REP1-007]**.

ExQ	Respondent	Question	Applicant's Response
			The Applicant has adopted different assessment tools for different flood mechanisms. Manning calculations are suitable as a proportionate sense-checking method for smaller ordinary watercourses and land drainage features. They were used to compare the assessed 1% AEP plus climate change levels with the conservative 0.1% AEP surface water mapping used for context, to understand local drainage pathways and to inform the micro-siting of infrastructure. That exercise did not identify locations where those smaller features would give rise to a significant flood risk to the Scheme, or where the Scheme would be likely to increase off-site flood risk through displacement of floodwater or interruption of existing flow routes. Detailed hydraulic modelling has been undertaken for Gauze Brook, and further modelling is being progressed for Gabriel's Well, because those locations involve direct Main River and floodplain interaction. The distinction is therefore not that Manning identified a problem requiring modelling, but that different tools were selected at the outset for different levels of flood risk interaction, an approach that was

ExQ	Respondent	Question	Applicant's Response
			discussed with and accepted by the Environment Agency and Wiltshire Council as the Lead Local Flood Authority during the assessment process. The Applicant has reviewed the point raised at paragraph 25 of **SLD's Written Representation, Appendix F1 [REP1-174]** regarding references to the 0.1% AEP and 1% AEP events. The Applicant accepts that the wording in some of the site-specific FRA and Drainage Strategy appendices could be clearer in distinguishing between: a. the 0.1% AEP Environment Agency surface water mapping used as a conservative mapping proxy for flood extent and water level context; b. the Manning calculations used to estimate indicative flow / level relationships at selected cross-sections; and c. the 1% AEP event plus the relevant climate change allowance used to inform the assessment of design flood levels. The Applicant will review and update the relevant site-specific **FRA and Drainage**

ExQ	Respondent	Question	Applicant's Response
			Strategy appendices [REP1-039, REP1-041, REP1-043, REP1-045, REP1-047, REP1-049, REP1-051 and REP1-053] to correct or clarify any inconsistent references to the 0.1% AEP and 1% AEP events at Deadline 3. For clarity, the 0.1% AEP surface water mapping was not used as a detailed hydraulic model of the design event. It was used as a conservative proxy to understand potential flood extents and indicative water levels where detailed modelling was not proportionate. The design assessment then considered the 1% AEP event plus the relevant climate change allowance. The Applicant will also cross-refer, where relevant, to the revised **ES Volume 2, Figures 11-1 to 11-8 [APP-135 to APP-142]**, which are proposed to be updated in response to **FHW1.3** to provide additional drainage and overland flow information. On this basis, the Applicant does not agree that SLD's analysis demonstrates a material on-site or off-site flood risk effect arising from the Scheme. The Manning calculations remain a proportionate screening tool for smaller

ExQ	Respondent	Question	Applicant's Response
			ordinary watercourses and drainage features, and the Applicant will clarify the relevant FRA wording to avoid any ambiguity between the 0.1% AEP mapping and the 1% AEP plus climate change assessment basis.
FHW1.6	The LLFA The Environment Agency	**Flood Risk Assessment – Cable Route Corridor** SLD notes in its submission at D2 [REP2-051] that the main risks regarding disruption to existing small scale drainage and potential disturbances to groundwater flow paths are not addressed. Considering this and the information included in the outline management plans, the LLFA and EA are asked to confirm if they think these issues are sufficiently addressed and if not, explain why not and where it should be addressed.	Question not directed at the Applicant.
FHW1.7	The Applicant	**Flood Risk Assessment – BESS and substation Fire Scenario** The firewater containment and drainage strategies for the BESS [REP1-124] and substation [REP1-125] explain that a design scenario comprising a localised fire combined with a 1 in 10yr rainfall event has been used as a credible basis for defining containment	The Applicant accepts that the 1 in 100 year event plus climate change is the correct basis for surface water drainage and flood risk design over the lifetime of the Scheme. It is not the correct basis for sizing firewater containment. Drainage design and firewater containment answer different questions. Drainage design

ExQ	Respondent	Question	Applicant's Response
		requirements. However, the 1 in 100yr event plus climate change can also be considered credible given the lifetime of the proposed development and to align with the flood risk analysis undertaken. The applicant is asked to set out the different containment requirements using the 1 in 100yr event plus climate change scenario for the BESS and substation. In your response explain the volume of water to be contained, potential impact with drainage or other infrastructure onsite, and other relevant considerations.	tests the resilience of the development over its operational life. Firewater containment tests the temporary retention of potentially contaminated water during and immediately after an incident. The two should not be aligned because they do not assess the same event. The Applicant's containment design basis is a localised fire combined with a 1 in 10 year rainfall event, as set out in **Firewater Containment and Drainage Strategy – Lime Down D BESS [REP1-124]** and **Firewater Containment and Drainage Strategy – Lime Down Substation [REP1-125]**. This reflects CIRIA C736, which uses accumulated rainfall on a 10% AEP basis for containment design. The Applicant is not aware of any containment guidance requiring a coincident fire and 1 in 100 year plus climate change event. The lifetime point applies to the storm event in isolation. Firewater containment is engaged only during the short period, measured in hours to a few days, when firewater is generated and retained following a fire. The relevant question is therefore not whether the

ExQ	Respondent	Question	Applicant's Response
			storm occurs within a year, but whether it occurs within that short window. This is a combination of two independent low-probability events, and the probability of both occurring together is the product of the two. It is therefore materially lower than either event considered alone. An annual probability is the chance of an event across a whole year. A 1 in 100 year storm has a 1% chance of occurring in any given year, not in any given day or week. Scaled to a 48 hour containment window, its probability is approximately 0.01 × (48 ÷ 8,760), or around 1 in 18,000, even if a fire were assumed certain to occur. A fire is itself a rare event, so the combined probability is lower still. Sizing containment for two rare events assumed to coincide compounds conservatism beyond what containment guidance requires, which is why CIRIA C736 pairs the fire with a 10% AEP rainfall rather than an extreme design storm. In normal operation, clean surface water is attenuated and discharged through the surface water drainage system. During a fire, the relevant system is isolated using shut-off

ExQ	Respondent	Question	Applicant's Response
			valves or equivalent so that potentially contaminated water is retained for testing, treatment, tankering or controlled disposal. This principle is set out in **ES Volume 3, Appendix 11-6: Flood Risk Assessment and Drainage Strategy Lime Down D (Rev 2) [REP1-047]**, **Firewater Containment and Drainage Strategy – Lime Down D Battery Energy Storage System [REP1-124]** and **Firewater Containment and Drainage Strategy - Lime Down Substation [REP1-125]**. The detailed design is secured through Requirement 11 (Surface Water Drainage) of the **Draft DCO [REP1-007]**, with operational controls secured through the **Outline OEMP [REP2-021]** and **Outline BSMP [REP1-110]**. The submitted containment approach is therefore based on the appropriate credible firewater scenario and relevant guidance.
FHW1.8	The Applicant	**Sequential and Exception Test** To pass the Exception Test the applicant should demonstrate that *'the development would provide wider sustainability benefits to the community that outweigh the flood risk;'* as	The Applicant confirms that no formal provision of, or financial contribution towards, flood risk management infrastructure has currently been agreed with Wiltshire Council or any Parish Council as part of the DCO application.

ExQ	Respondent	Question	Applicant's Response
		per National Planning Policy Framework, paragraph 178. Paragraph 5.2.1 of Annex C included in the Planning Statement [APP-267] refers to examples of wider sustainability benefits including, *'an overall reduction in flood risk to the wider community through the provision of, or financial contribution to, flood risk management infrastructure'*. The overall reduction in flood risk is explained in paragraphs 5.2.4 to 5.2.8. The applicant is asked to confirm if any provisions of or financial contributions to flood risk management infrastructure have been considered or agreed with Wiltshire Council or Parish Councils (separate from the community benefit scheme mentioned in paragraph 5.2.12 (noting the latter cannot be taken into account in the planning balance)). If so, the applicant is asked to provide further information.	However, the Applicant is actively seeking to assist with the understanding of existing flooding issues in and around Corston. In response to local community concerns and the interest raised around potential flood alleviation opportunities associated with Gauze Brook including those raised at the Open Floor Hearing on 24 April 2026, the Applicant is voluntarily commissioning additional topographic survey and updated hydraulic modelling for Lime Down D. Its purpose is to establish whether workable flood alleviation, catchment management or natural flood management measures in and around Gauze Brook could produce a meaningful benefit for Corston and downstream communities. Potential conceptual measures will be tested through the updated hydraulic model, so that any future discussion is informed by a robust technical evidence base. The modelling outputs will be provided to Wiltshire Council, the Environment Agency and the local community via the relevant Parish Councils. The intention is that the survey

ExQ	Respondent	Question	Applicant's Response
		The applicant is asked to revise section 'An overall reduction in flood risk' to clarify this point.	information, updated model and conceptual outputs can then be used by the relevant authorities and local stakeholders to inform any future flood alleviation opportunities they may wish to take forward. This work does not form part of the submitted Flood Risk Assessment and Drainage Strategy, which demonstrates that the Scheme would not increase flood risk elsewhere. Furthermore, it is not relied upon as mitigation required to make the Scheme acceptable in flood risk terms, but is being progressed voluntarily by the Applicant to provide a positive community benefit exercise to seek to help alleviate existing flood risk issues and to provide a useful evidence base for the local area.
FHW1.9	The Applicant	**Construction** The EA has raised concerns in [REP2-049] regarding the assessment of the flood risk impacts during the construction phase. The EA considers that further assessment is needed to understand and address the impact that the construction phase may have on the floodplain	The Applicant notes the ExA's question. Discussions with the Environment Agency and Wiltshire Council LLFA remain ongoing through the Statements of Common Ground. The Applicant notes the Environment Agency's request for further clarity on construction phase effects on floodplain capacity and flood

ExQ	Respondent	Question	Applicant's Response
		capacity and flow routes. The LLFA highlights in Wiltshire Council's LIR [REP1-137] the lack of demonstrated pre- and post-construction exceedance flow routing for 1 in 100yr plus climate change event as one of the most significant risks during construction and requests a new requirement ('Pre-and post-construction exceedance flow routing plan'). The ExA note the applicant's responses to the LIR [REP2-038]. The applicant is asked to provide an update on the discussions with the EA and the LLFA on these points. If further assessment is needed, the applicant is asked to provide timescales for the assessment. If no further assessment is required at this stage but would be required before construction starts, the applicant is asked to explain how it would be secured in the dDCO and outline management plans.	flow routes. The Applicant will update the **Outline CEMP [REP2-019]** 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 at Deadline 3 to confirm that construction phase works will maintain floodplain capacity and flood flow routes. The Applicant notes Wiltshire Council LLFA's request for a new "Pre-and post-construction exceedance flow routing plan" requirement. The Applicant does not consider a standalone requirement is necessary. Construction phase surface water management, temporary drainage and exceedance routing are already secured through Requirement 13 of the **Draft DCO [REP1-007]**, which requires approval of the detailed CEMP before construction. No further assessment is required at this stage. The final construction layout, haul routes, compound locations, stockpile locations, temporary works and construction sequencing are not fixed and will be confirmed

ExQ	Respondent	Question	Applicant's Response
			by the appointed contractor. A detailed exceedance routing plan prepared now would therefore be premature. The detailed CEMP will include a construction-stage Water Management Plan, or equivalent, as secured through Table 5: Hydrology, Flood Risk and Drainage of the **Outline CEMP [REP2-019]**. The Water Management Plan will set out how temporary drainage, runoff from disturbed ground, silt and sediment control, existing flow routes, temporary crossings and exceedance flows will be managed during construction. Where temporary works, temporary drainage, construction sequencing or construction access could materially affect an existing flow route or local floodplain interaction, the Water Management Plan will identify the need for any localised further assessment, modelling or design verification before the relevant works commence. Soil compaction and reinstatement risks will also be controlled through **7.15 Outline Soil Resources Management Plan [APP-280]**. The Applicant's position remains that blanket hydraulic modelling of the Solar PV Sites or

ExQ	Respondent	Question	Applicant's Response
			panelled areas is not required. That position is set out in the **Applicant's Response to Lead Local Flood Authority on Hydraulic Modelling Requirements [REP2-045]**. Construction phase risks are temporary, localised and capable of being managed through the detailed CEMP, temporary drainage design and site-specific method statements. The Applicant will continue engagement with the Environment Agency and Wiltshire Council LLFA on the wording of the relevant updates.
FHW1.10	The LLFA The Environment Agency	**Operation – Surface Water Run-off Discharge to Watercourses** The applicant explains in the outline drainage strategies [APP-210 to APP-218] that surface water would be generally discharged into SUDS and local drainage features which would eventually discharge into local watercourses and main rivers. Given that quantification of the surface water run-off volumes to be discharged is not available at this point, the LLFA and the EA are asked to provide information regarding the	The Applicant notes that this question is directed to the Environment Agency and LLFA but provides the following clarification. As set out in the Applicant's responses to **FHW1.1**, **FHW1.3** and **FHW1.5**, the panelled areas are not connected impermeable drainage catchments. Solar PV panels are elevated, drain to the existing ground beneath and between the arrays, and do not increase surface water discharge rates or volumes from the panelled areas.

ExQ	Respondent	Question	Applicant's Response
		ability of the receiving watercourses to receive these discharges without increasing flood risk in the wider catchment.	Formal impermeable drainage areas, including the BESS, substations and associated hardstanding, are assessed separately. Where controlled discharge is required, peak discharge rates will be restricted to 70% of the equivalent greenfield rate, as set out in the FRA and Drainage Strategy suite **[REP1-037, REP1-039, REP1-041, REP1-043, REP1-045, REP1-047, REP1-049, REP1-051 and REP1-053]**. The receiving watercourses will therefore not be required to accept an increased peak discharge from the Scheme. For rainfall events where runoff from formal impermeable drainage areas would otherwise exceed the committed 70% greenfield rate, attenuation and flow control will reduce the peak discharge below the equivalent baseline rate. On that basis, the Applicant considers that the proposed drainage strategy appropriately manages runoff from the Scheme. The Scheme does not introduce an uncontrolled increase in runoff to receiving watercourses. Detailed drainage design, including final contributing areas, attenuation volumes, flow

ExQ	Respondent	Question	Applicant's Response
			controls and outfall arrangements, is secured through Requirement 11 of the **Draft DCO [REP1-007]**.
FHW1.11	The Applicant	**Decommissioning** There is no information regarding what would happen to the installed SUDS at the end of the proposed development's life. The applicant is asked to confirm if all SUDS would be removed during decommissioning and what would be the measures in place to ensure that flood risk is not increased as a result.	The Applicant confirms that SuDS and drainage features installed to serve the Scheme would be removed during decommissioning, unless otherwise agreed with the relevant planning authority through the detailed Decommissioning Strategy. Drainage would be maintained during decommissioning until the infrastructure it serves has been removed and the affected land has been reinstated. Temporary drainage, silt control and runoff management measures would be used during decommissioning to ensure that flood risk is not increased on site or elsewhere. Following removal, affected areas would be reinstated to a stable drainage condition, including restoration of ground levels, soil structure and existing surface water flow routes where relevant. These measures would be secured through the detailed Decommissioning Strategy,

ExQ	Respondent	Question	Applicant's Response
			prepared in accordance with the **Outline Decommissioning Strategy [REP1-101]** and Requirement 20 of the **Draft DCO [REP1-007]**.
FHW1.12	The Applicant	**Flood Risk to Infrastructure – Sites C1 and D** Figure 11-3.2 Lime Down C1 Fluvial Flood Risk Map [APP-137] shows the 132kV substation at high risk of surface water flooding in the south area of field C33. The ExA note the need for the substation to be in a central location within the site. The Applicant: The applicant is asked to explain why the substation is located there and not in the north of field C33 or in other field at lower risk of all types of flooding within site C such as C19 which is also close to the cable route corridor. The first bullet point of paragraph 2.4.13 of [APP-213] states *'The substation will be sequentially located within Field C33 to avoid obstructing the mapped surface water flow route where feasible (…)'*. The applicant is asked to explain the need for the words *'where*	The Applicant notes the ExA's question. The 132 kV substation within Lime Down C1 is shown as an indicative location within Field C33 at this stage. The final substation platform location and arrangement will be confirmed through detailed design. Field C33 has been selected as the appropriate field for the substation because it provides a central location within Lime Down C1 for electrical design, access and connection purposes, while allowing the substation to be microsited within the field to respond to flood risk, environmental and constructability constraints. The Applicant does not consider that the whole of Field C33 should be read as the final substation platform footprint. The detailed design will first seek to locate the substation platform in the northern / lower risk part of Field C33, outside the mapped surface water flow route where practicable. The wording "where feasible" in paragraph 2.4.13 of **6.3 ES**

ExQ	Respondent	Question	Applicant's Response
		feasible'. If the substation is located where it does not obstruct a surface water flow route, the substation platform would not need to be elevated to allow for freeboard. In your response, please consider the EA's comment 073 in document [REP2-049] regarding the potential need for further assessment and compensatory storage. Please provide an update on the discussions with the EA regarding this point. The LLFA: An ordinary watercourse between fields D22 and D1 is mapped in the flood risk assessment [APP-215] but the analysis suggests low risk of flooding. As this watercourse runs between the potential location of the 400kV substation and the BESS area, the LLFA is asked to confirm the findings of [APP-215] and submit any further relevant information available if not already included in the document.	**Volume 3 Appendix 11-4 Flood Risk Assessment and Drainage Strategy Lime Down C1 (Rev 2) [REP1-043]** reflects that the final platform arrangement must also take account of electrical layout, access, construction, safety, land and environmental constraints. It is not intended to allow the detailed design to obstruct a surface water flow route without assessment or mitigation. If the detailed design can avoid the mapped surface water flow route, no further flow-route mitigation or compensatory storage would be required for that flow route. If the detailed design cannot avoid the mapped surface water flow route in full, the design will need to demonstrate that the existing surface water flow route is maintained or appropriately diverted, and that the substation would not increase flood risk on-site or off-site. This may require localised hydraulic assessment, modelling or design verification before approval of the relevant detailed design. The Applicant's position is therefore that the preferred design response is avoidance through micrositing. Where avoidance is not

ExQ	Respondent	Question	Applicant's Response
			practicable in full, any change to the existing surface water flow route would be managed through detailed design so that conveyance and storage are maintained and there is no increase in flood risk elsewhere. Any compensatory storage would only be required if the detailed design identifies a material loss of flood storage or material obstruction of a flow route. The detailed design of the substation is secured through Requirement 5 of **draft DCO [REP1-007]**. Surface water drainage for the substation is secured through Requirement 11 of **draft DCO [REP1-007]**. The Applicant will continue engagement with the Environment Agency on this matter through the Statement of Common Ground. At the time of this response, discussions remain ongoing.
FHW1.13	The LLFA	**Interaction with Future Plans for Gauze Brook Restoration** St Paul Malmesbury Without Parish Council in their post hearing submission [REP1A-016] refer to work with Hullavington Partish Council and Wiltshire Council's Flood Resilience officer	The Applicant refers the ExA and LLFA to its response to FHW1.8 above.

ExQ	Respondent	Question	Applicant's Response
		to alleviate flooding in the Gauze Brook. The ExA note the applicant's response in [REP1A-013] (SS-002, pages 348-349) which explains that the proposed development does not include in-channel works or permanent structures that would prevent future interventions and restauration. The LLFA is asked to provide further information regarding the plan's timescales and any other relevant details (outline business plan, design, impact, funding, etc). The LLFA is asked to confirm agreement or otherwise with the applicant's conclusions.	
FHW1.14	The Applicant Easton Grey Parish Council	**Impact on Existing Water Infrastructure** Easton Grey Parish's post hearing submission [REP1A-018] refers to impact from the scheme on the community sewage plant. The Applicant: The applicant is asked to explain if the proposed development could impact on the community sewage plan and if so, how it would be mitigated.	The Scheme is not expected to impact the Easton Grey community sewage plant. No foul water from the Scheme is proposed to discharge to the community sewage plant. Construction welfare would be self-contained and managed through the detailed CEMP. Operational foul water from substations would be stored in sealed tanks or cesspools, with periodic removal by tanker to an appropriately licensed disposal facility.

ExQ	Respondent	Question	Applicant's Response
		Easton Grey Parish Council: Easton Grey Parish Council is asked to explain if there has been any communication with Wessex Water regarding the impact of the development on the sewage plan and if so, to submit the relevant information and correspondence.	Surface water from the Scheme would not be discharged to the foul sewer or community sewage plant. Panelled areas drain to ground and are not connected impermeable drainage catchments. Formal impermeable drainage areas would be attenuated and controlled through the drainage strategy secured by Requirement 11 of the **Draft DCO [REP1-007]**. Where any existing drainage, sewer or utility infrastructure is identified within or close to the working area, it would be protected through detailed design and construction method statements, secured through the detailed CEMP under Requirement 13 of the **Draft DCO [REP1-007]**. On this basis, no impact on the community sewage plant is anticipated and no specific mitigation is required beyond the secured drainage, foul water and construction management controls.
FHW1.15	The Applicant	**Water Quality** The EA raises in its D2 submission [REP2-049] a number of currently unresolved water quality concerns: piling (EA-023), BESS	Discussions with the Environment Agency and Wiltshire Council remain ongoing through the Statements of Common Ground. The Applicant considers that the outstanding water quality

ExQ	Respondent	Question	Applicant's Response
		foundation solution (EA-024), suitable mitigation where groundwater may be encountered (EA-027), thermal implications of cables (EA-030), reference to breakout contingency procedure in the cable route construction method statement (EA-038), reference to firewater management information in the oOEMP (EZ-046), insufficient water mitigation measures in the oCEMP (EA-070). Wiltshire Council in its LIR [REP1-137] highlights water quality impacts during construction and decommissioning. Several IPs have also raised concerns regarding the potential for pollutants from damaged panels, substations and BESS area (under fire and non-fire conditions) to enter surface water and groundwater, especially in Source Protection Zones. The applicant is asked to provide an update on the discussions with the EA and Wiltshire Council and the likelihood of their resolution. The applicant is also asked to set out the mitigation measures secured through the environmental management plans (including	matters are capable of resolution through targeted document updates and the detailed design and management plans secured by the **Draft DCO [REP1-007]**. The remaining points relate to piling and foundation risk, groundwater encounter and dewatering controls, cable thermal effects, breakout contingency procedures, firewater post-incident management and consistency of water quality mitigation in the **Outline CEMP [REP2-019]** and **Outline OEMP [REP2-021]**. These do not identify an unmitigated significant water quality effect. However, it should be noted that ground investigation will be undertaken prior to the construction phase (as secured through the **Outline CEMP [REP2-019]**) and this in turn will be used to finalise foundation design, undertake appropriate piling risk assessment and where required, inform hydrogeological risk assessment to help manage identified risks to receptors such as private water supplies. This ground investigation and associated hydrogeological testing will also be used to help inform cable selection,

ExQ	Respondent	Question	Applicant's Response
		the Water Management Plan, referred to in the oCEMP) to ensure effecting monitoring and management of water quality for all sites.	considering the thermal impacts of cables on water receptors. Construction water quality risks will be controlled through the detailed CEMP, including the Water Management Plan. This will address temporary drainage, silt control, runoff management, watercourse protection, fuel and chemical storage, concrete works, washdown, drilling fluid management, dewatering, monitoring and emergency response. BESS and substation water quality risks will be controlled through sealed or otherwise controlled drainage, isolation valves, containment, inspection and testing before discharge, and tanker removal or controlled disposal where required. These principles are set out in the **Firewater Containment and Drainage Strategy - Lime Down D Battery Energy Storage System [REP1-124]** and **Firewater Containment and Drainage Strategy - Lime Down Substation [REP1-125]**.

ExQ	Respondent	Question	Applicant's Response
			Operational controls will be secured through the detailed OEMP and final Battery Safety Management Plan. Decommissioning water quality risks will be controlled through the detailed Decommissioning Strategy. The Applicant will continue engagement with the Environment Agency and Wiltshire Council on the relevant updates.
FHW1.16	The Applicant	**Water Supply** From the information submitted, it is not clear if Bristol Water or Wessex Water would supply the water needed for the development. The applicant is requested to provide an update on the proposed water supply during construction, operation/maintenance and decommissioning, including who would supply the water and confirmation that an agreement has been reached. Should this agreement also be referenced in the Consents and Agreements Position Statement [APP-272]? Wiltshire Council in its D2 submission [REP2-048] requests that rainwater harvesting for non-potable uses be explored when feasible. The ExA note that surface water runoff	As stated in the **Outline Water Resources Strategy [APP-290],** Bristol Water confirmed that they are able to provide a water connection from an existing 4-inch cast iron water main in a location close to field A1 of the Scheme near Sherston. Bristol Water also confirmed that a flow of 7 m^3/hour was possible from this connection, which is sufficient to provide the 169m^3/day peak water demand required for the Scheme during its construction phase, especially given the conservative estimation of water demands used in this assessment. The Applicant notes the possibility of rainwater harvesting for non-potable uses where feasible

ExQ	Respondent	Question	Applicant's Response
		harvesting is not considered a priority as stated in the outline Water Resources Strategy [APP-290]. However, the applicant is asked to consider the potential water and carbon benefits of reusing water on-site and comment on its feasibility.	and has updated the **Outline CEMP (Rev 4) [EN010168/APP/7.12]** to reflect this.
FHW1.17	The Applicant	**Water Framework Directive** The EA explains in [REP2-049] that it is waiting for a groundwater bodies plan and proportionate signposting to ES Chapter 11. The applicant is asked to confirm if this has been now provided to the EA and if the issue is likely to be resolved (as explained in the document).	The groundwater bodies plan has not yet been provided to the Environment Agency. It will be submitted at Deadline 3. **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]** (Revision 3) has been updated at Deadline 3 to include proportionate signposting to the groundwater bodies plan and the Water Framework Directive Assessment. The Environment Agency has indicated that the matter is resolved in principle and that it expects to be able to resolve the issue once the plan and signposting have been provided. The Applicant therefore considers that this issue is likely to be resolved following submission of the updated material.
FHW1.18	The Applicant	**Draft DCO - Article 2(1) (Interpretation)**	The Applicant notes the ExA's concern. The current overarching drainage strategy is

ExQ	Respondent	Question	Applicant's Response
		Article 2(1) of the dDCO [REP1-007] refers to an 'outline drainage strategy' and cross refers to a document of the same name to be certified in Schedule 13. Schedule 13 cites the document as: *'Outline drainage strategy, [EN010168/APP/6.3], September 2025.'* Schedule 2, Requirement 11(2) also refers to an outline drainage strategy. The ExA note that examination library documents [APP-210 to APP-218] are called 'Flood Risk Assessment and Drainage Strategy'. Having reviewed those documents, it is not sufficiently clear that there is a definite and obvious drainage strategy component within them. The applicant is therefore requested to either clearly signpost in their contents page where the details of the drainage strategy can be found, or submit a stand-alone outline drainage strategy (or one for each site A to E and the CRC if that is the preferred approach) so that it/ they can form the basis of a certified document(s) in Schedule 13.	located in Section 6 of **6.3 ES Volume 3 Appendix 11-1 Flood Risk Assessment and Drainage Strategy Covering Report (Rev 2) (Clean) [REP1-037]**. To address the ExA's request for clearer signposting, the Flood Risk Assessment and Drainage Strategy documents will be retitled as Flood Risk Assessment and Outline Drainage Strategy documents at Deadline 4. The revised documents will include an updated covering report and updated supporting appendices for Lime Down A, Lime Down B, Lime Down C1, Lime Down C2, Lime Down D, Lime Down E1, Lime Down E2 and the Cable Route Corridor. These are currently submitted as the site-specific Flood Risk Assessment and Drainage Strategy appendices at **[REP1-039]**, **[REP1-041]**, **[REP1-043]**, **[REP1-045]**, **[REP1-047]**, **[REP1-049]**, **[REP1-051]** and **[REP1-053]**. Each relevant supporting appendix will include a clearly labelled Outline Drainage Strategy section, so that the drainage strategy component is definitive, clear and readily identifiable.

ExQ	Respondent	Question	Applicant's Response
			The Outline Drainage Strategy sections will incorporate the additional drainage information provided in response to the ExA's written questions, including the matters addressed in response to FHW1.3. This will provide a clear basis for certification and for the operation of Requirement 11 of **draft DCO [REP1-007]**. For clarity, the Outline Drainage Strategy documents will set out the drainage principles, design objectives and performance requirements that have informed the flood risk and drainage assessment of the Scheme, and which will guide the detailed drainage strategy required under Requirement 11. These include, where relevant, principles relating to runoff management, attenuation and storage, discharge arrangements, water quality treatment, exceedance management, containment and isolation measures, maintenance and flood risk management. The detailed drainage strategy will be prepared at the detailed design stage and must be substantially in accordance with the relevant Outline Drainage Strategy documents. It will take account of the final technology selection,

ExQ	Respondent	Question	Applicant's Response
			platform layouts, access arrangements, impermeable areas, levels, outfall arrangements and site-specific constraints. The Outline Drainage Strategy documents will therefore secure the drainage principles and outcomes assessed at this stage, while retaining appropriate flexibility over the final drainage layout, drainage components and detailed engineering solutions to be approved through Requirement 11.
FHW1.19	The LLFA	**Draft DCO – Ordinary Watercourse Consent and Environmental Permitting** Article 6 of the dDCO [REP1-007] disapplies section 23 (prohibition of obstructions, etc. in watercourses) of the Land Drainage Act 1991 and regulation 12 (requirement for environmental permit) of the Environmental Permitting (England and Wales) Regulations 2016. Article 17 of the dDCO controls the discharge of surface water and requests consent from the relevant undertaker. Part 9 of the dDCO ('For the protection of drainage authorities') includes provisions in relation to work around watercourses. The LLFA raised concerns in Wiltshire Council's LIR [REP1-137] about risk of	Question not directed at the Applicant.

ExQ	Respondent	Question	Applicant's Response
		pollution and flow disruption due to horizontal directional drilling and temporary crossings near ordinary watercourses works without Ordinary Watercourse Consent do not include and apply agreed LLFA principles. The LLFA requested a specific requirement in page 97 of the LIR ('Horizontal Directional Drilling Method Statement and Frac-Out Contingency') 1) The LLFA is asked to confirm agreement or otherwise with the wording of articles 6 and 17 of the dDCO regarding ordinary watercourse consent. 2) The LLFA is requested to explain if Article 17 and the provisions in Part 9 of the dDCO provide enough protection to ensure that the LLFA principles would be actioned or if further wording within the dDCO is needed instead of the addition of another requirement. 3) If the response is negative, the LLFA is requested to submit the proposed changes to the wording of the dDCO. 4) The LLFA is asked to consider if specification of the consents needed for decommissioning is needed, as all	

ExQ	Respondent	Question	Applicant's Response
		stages of the development are already covered in Article 6 of the dDCO.	
FHW1.20	The LLFA The Applicant	**Draft DCO – Requirements 11 (Surface and foul water drainage) and 20 (Decommissioning and restoration)** The LLFA in Wiltshire Council's LIR [REP1-137] highlighted few issues regarding SUDS, including the need for verification of SUDS before operation, SUDS retirement and decommissioning plan, decommissioning run-off management, and soil reinstatement performance target. The LIR proposes new requirements to manage surface water including: Operational Drainage Inspection, Testing and Maintenance Plan, Detailed Construction Environmental Management Plan, Pre- and Post-Construction Exceedance Flow Routing Plan, SUDS Retirement and Decommissioning Drainage Plan and Soil Reinstatement Targets and Verification. This number of new requirements and level of detail may not be needed if appropriate reference is made to the information required in the outline drainage strategy(s) and relevant outline management plans. However, the ExA note	The Applicant notes the ExA's question. Requirement 11 of **draft DCO [REP1-007]** already requires drainage details to be approved for the relevant part of the authorised development before that part commences. The Applicant considers that this provides an appropriate mechanism for drainage details to come forward in a phased or part-by-part manner, reflecting the final detailed design and construction sequence. The detailed drainage strategy submitted under Requirement 11 will identify any phasing requirements necessary for the relevant part of the authorised development, including where drainage or SuDS features are required to be installed before the impermeable infrastructure which they serve. The Applicant does not consider that a separate checklist requirement is necessary. However, the Applicant would be content to include brief wording in the Flood Risk Assessment and Outline Drainage Strategy documents to be submitted at Deadline 4 to

ExQ	Respondent	Question	Applicant's Response
		the need for a phasing approach for design, implementation and decommissioning of SUDS and considers that it may be possible to embed this into Requirement 11. Taking this into consideration the ExA requests the following: The LLFA: Comments regarding the introduction of a phasing approach in Requirement 11 and, if appropriate, proposed revised wording. Any information that should be included in the outline drainage strategies [APP-210 to APP-218] and relevant outline management plans to support the preparation of the final documents and a timely discharge of the relevant requirements. Confirmation regarding the need for the LLFA to be included as a consultee for the discharge of Requirement 20 under 20(5) The Applicant:	identify the type of information expected to support the detailed drainage design submitted under Requirement 11. This would include, where relevant, drainage catchments, impermeable areas, discharge rates, attenuation and storage requirements, flow controls, outfalls, exceedance routing, water quality treatment, containment and isolation measures, phasing requirements, inspection and maintenance principles and any site-specific design constraints. The Applicant considers that the matters identified by Wiltshire Council LLFA are already capable of being secured through the existing Requirements and outline management plans, without the need for additional standalone requirements. Construction phase drainage, temporary drainage, runoff control, silt management and construction-stage water management will be secured through the detailed CEMP required under Requirement 13 of the **draft DCO [REP1-007]**, which must be substantially in accordance with **Outline CEMP [REP2-019]**. Operational drainage inspection, testing and

ExQ	Respondent	Question	Applicant's Response
		The applicant is asked to provide comments regarding the need to introduce phasing in the wording of Requirement 11. The applicant is asked to consider if a checklist showing all the information to be covered in the final drainage strategy should be included in documents [APP-210 to APP-218] (or any subsequent strategy, noting ExQ1 FHW1.18 above) to support timely discharge of the Requirement.	maintenance will be secured through the detailed OEMP required under Requirement 14 of the **draft DCO [REP1-007]**, which must be substantially in accordance with **7.13 Outline OEMP [REP2-021]**. Decommissioning drainage, runoff management and SuDS retirement will be secured through the detailed Decommissioning Strategy required under Requirement 20 of **draft DCO [REP1-007]**, which must be substantially in accordance with the **Outline Decommissioning Strategy [REP1-101]**. Soil reinstatement matters are also addressed through the outline soil management controls and will be reflected in the relevant detailed construction and decommissioning documentation. The Applicant therefore does not consider that additional drainage-specific requirements are necessary. The existing Requirements provide a proportionate mechanism to secure the drainage principles, phasing, maintenance and decommissioning controls, while retaining appropriate flexibility for the final detailed design and construction sequence.

ExQ	Respondent	Question	Applicant's Response

2.10 General and Cross-Topic Questions

ExQ	Respondent	Question	Applicant's Response
GCT1.1	The Applicant	**Outline Construction Environmental Management Plan** A set of plans is required to be attached to the oCEMP [REP1-096] which shows the field parcels referred to in the various mitigation and monitoring commitments (for example glint and glare and cultural heritage).	The fields referred to within the **Outline CEMP [REP2-019]** can be identified in **ES Volume 2, Figure 2-2: Figure 2-2-1 to 2-2-5 Field Boundaries and Numbering [APP-078].** The Applicant has updated the Outline CEMP for Deadline 3 to cross-refer to this plan to provide further clarity around where mitigation is being proposed.
GCT1.2	The Applicant Wiltshire Council	**Section 106 Contributions** In paragraph 9.101 of its RR [RR-4934] Wiltshire Council requests a developer monitoring contribution (amount to be agreed) to support its monitoring of the Ecological Protection and Mitigation Strategy, amongst other things. The ExA note the applicant's silence on this request in its response to RRs [PDA-009]. The ExA requires an update from both parties with respect to discussions on developer monitoring contributions for both the construction and operational and maintenance periods. Those discussions should also include consideration of index linking. Signed s106 agreements are required	The Applicant is aware that the approach to monitoring has been raised by Wiltshire Council across a number of topics and its preference is to agree a consistent approach with Wiltshire Council to monitoring across the Scheme. This would include monitoring under the Ecological Protection and Mitigation Strategy and all other management plans. While a section 106 agreement is one mechanism through which an approach to monitoring can be agreed, the Applicant is in discussions with Wiltshire Council about other options for securing this, including a post-consent, or extension of the current, Planning Performance Agreement. Provision for monitoring could also be included within the

ExQ	Respondent	Question	Applicant's Response
		to be submitted prior to the close of the Examination in order for the SoS to be able to take them into account. If the applicant considers that monitoring would not be required by the Council, how can the SoS be assured that the mitigation measures would be implemented and maintained for the life of the development? The ExA also notes Wiltshire Council's request for £20,000 pa for the improvement and enhancement of PRoW, and the applicant's response [PDA-009] that it is only able to commit to improvements and/ or enhancements to PRoW within the Order Limits, such that financial contributions to PRoW network maintenance and upgrades beyond the Order limits would need to be agreed through the Community Benefit Fund which operates and is to be agreed outside of the DCO process. The ExA considers the applicant's position on this matter ignores the potential displacement of users to PRoW outside of the Order limits and the benefit of creating new PRoW routes to help to link up to PRoW within the Order	relevant management plans submitted for approval, enabling the contribution to be tailored to the monitoring required. The Applicant will provide an update on progress regarding these discussions in the next version of the Statement of Common Ground with Wiltshire Council and will seek to have the approach to monitoring agreed before the end of examination. The Applicant intends for the agreed approach to include an index linking mechanism. Regarding displacement of PRoW users outside of the Order Limits, the Applicant's position is that while specific assessment of displacement from one PRoW to another has not specifically been assessed, the assessment in **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]** does include consideration of overall impacts to PRoWs across the 2 km Study Area, and as such these have been used to give a summarising level of effect as reported in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** wherein no significant effect to the PRoW

ExQ	Respondent	Question	Applicant's Response
		limits. The applicant is requested to discuss this matter further with the Council and include and provide updates in the SoCG [REP2-025].	is assessed as likely to occur. This has then been considered in respect to the experience for users, and the extent to which this would dissuade physical use or reduce mental wellbeing benefits from access to the countryside in **ES Volume 1, Chapter 18: Human Health [APP-070]**, which also finds no significant adverse effect at any phase of the Scheme to physical and mental wellbeing. The Applicant considers it a proportionate and robust position that impacts to the PRoW network as a result on the Scheme should be mitigated by onsite measures, as secured through the management plans by the Requirements in Schedule 2 to the **Draft DCO [REP1-007]**. This has been done to ensure users who continue to use PRoWs affected by the Scheme are impacted as little as its practicable. Displacement onto different PRoWs is a matter that has a large number of variables: route length, PRoW use purpose (recreation, exercise, or travelling between points), and personal choices; that are largely outside the control of the Applicant and could occur irrespective of the Scheme. Hence, any

ExQ	Respondent	Question	Applicant's Response
			upgrades or enhancements to PRoWs not within the Order Limits are considered to be a community benefit, rather than a mitigation measure for the Scheme. As such, the Applicant considers it most appropriate for these to be funded through the Community Benefit Fund. Whilst this therefore cannot be considered in the planning balance for the Scheme, it allows for any PRoW enhancements to be delivered as community initiatives based on direct community engagement. The Applicant notes that this question has been tied to Question HW1.2, wherein a specific assessment of displacement has been requested. In response to the request, the Applicant will provide an additional technical note on displacement effects that can be identified on the PRoW network affected by the Scheme at Deadline 4. The Applicant will also seek to use this time to discuss the outcomes of this assessment with Wilshire Council's PRoW team and will present any discussions undertaken in the next iteration of the Statement of Common Ground.

ExQ	Respondent	Question	Applicant's Response
GCT1.3	The Applicant	**Replacement of Panels and Batteries** During the operational period you intend to replace the solar PV panels after the initial 30-years and the batteries up to 5 times [APP-055]. 1) Would the frames of the solar PV panels need to be replaced? 2) What guarantees are there the frames/ panels would be the same size as those being replaced, especially considering the advancements in technology? 3) If there are no guarantees, would this mean that there may be a need to replace the frames and for additional piling to be carried out at that time? 4) Would the connection agreement have to be reviewed or revised as part of the operational phase planned replacement on the basis that as the technology advances panels become more efficient and more productive, or is the proposed development designed with future proofing in mind (such as the capacity of the substations and cabling)?	1) The mounting structures will be designed with material specifications and corrosion protection to maintain structural integrity. Periodic inspections and preventive maintenance will be undertaken to ensure the structure's continued load-bearing capacity and corrosion resistance throughout the operational period. The frames, within which the solar panels sit, are integral to the solar panels and would be replaced along with the panels. The frames and panels are affixed to the mounting structures which have a 40-year warranty from the manufacturer and with regular maintenance are anticipated to last longer. There is currently no data available as to the failure rate of equivalent mounting structures after 40 years. If ad-hoc replacement of the mounting frames is required, it could be undertaken without replacing the pile in the ground avoiding the need for extensive intrusive ground works. 2) Paragraph 3.5.34 of **ES Volume 1, Chapter 3 The Scheme [APP-041]** states that no intrusive ground works are anticipated as panels are being replaced. The Applicant cannot confirm that in 40

ExQ	Respondent	Question	Applicant's Response
		5) If the output of the solar farm is to remain restricted as per the current connection agreement for the life of the Order, would using more efficient, or more productive panels when they are replaced result in the need for less panels and thus more waste, and what would this mean for the overall layout of the solar PV sites?	years' time new panels and frames would slot into the mounting structures without adjustment. However, in the event a different panel size was required, the mounting structures are made of metal, and it is anticipated that modifications could be made to enable the continued use of the mounting structures. 3) If it were established that panels and frames could only be replaced in a different size, and that modifications to the mounting structures to accommodate this was not possible, then additional piling may be needed and the impacts of this would need to be considered at the time to understand if the activity would give rise to new or materially different environmental effects to those assessed in the ES and if further consents would be required. It is considered very unlikely that panel sizes would have changed to such an extent within the lifetime of the Scheme, and that backwards compatibility with mounting structures was not factored into industry developments, given the ongoing need for the solar industry to be able to obtain ad-hoc and scheduled replacement panels.

ExQ	Respondent	Question	Applicant's Response
			4) The majority of the operational phase is expected to take place using operational panels installed at the point of construction, which has been designed to fit the grid connection offer capacity, the substations and the cabling. At the point of large-scale replacement of panels, the connection agreement could theoretically be reviewed but the substations and cabling have been designed with the current offer i.e. 500MW export in mind so there would be limited opportunities to significantly increase the output of the site. 5) If the output of the solar farm were to remain restricted as per the current connection agreement for the life of the Scheme, using more efficient, or more productive panels when they are replaced could result in the need for fewer panels but there would not be more waste – the panels that had been operational would go for recycling as described in **ES Volume 2 Chapter 20: Other Environmental Matters [APP-072]** and its associated appendix **ES Volume 3, Appendix 20-3 Materials and Waste Methodology and Baseline [APP-260]**. There would then be fewer replacement panels which would

ExQ	Respondent	Question	Applicant's Response
			result in less waste overall than has been considered as part of the ES which assumed a full replacement of all panels. Alternatively, if more efficient panels were used, then a commercial decision would need to be made regarding the overplanting level as described further in the response to Examiner's Question ALT1.4 – it may be preferred to increase the overplanting ratio and therefore generate the maximum grid capacity across a longer time period within each year rather than reduce the overall number of panels. In that case the amount of waste would remain as assessed in the replacement scenario in the ES.
GCT1.4	The Applicant National Grid Electricity Transmission Plc	**Works at Melksham Substation** The applicant: 1) You are asked to detail how the proposal ties in with the necessary works at Melksham substation to facilitate the grid connection. 2) Does the ES consider these works and if so please signpost where this has been considered? If not, please provide these details.	The Existing National Grid Melksham Substation is included within the Order Limits of the Scheme. As described in **ES Volume 1 Chapter 3: The Scheme,** the Grid Connection Cables would connect to the national grid at the Existing National Grid Melksham Substation. Minor modifications would be undertaken by National Grid relating to extending the existing busbars within the substation under the powers of the Applicant's DCO (or NGET's existing permitted

ExQ	Respondent	Question	Applicant's Response
		3) To secure these works should the dDCO include a Grampian style requirement? <u>National Grid Electricity Transmission Plc:</u> You are asked to provide an update on discussions regarding the grid connection and the works required at Melksham substation	development rights). Works undertaken by the Applicant would comprise the installation of a new 400 kV feeder bay and associated connection works. Accordingly, the necessary works to the Existing National Grid Melksham Substation comprise Work Number 4 '*works to the National Grid substation to facilitate connection of the authorised development to the National Grid including population of the substation bay*' and Work Number 5 *'works in connection with electrical cabling'* as set out in Schedule 1 to the **Draft DCO [REP1-007]**. The likely environmental effects arising from these works have been considered, where relevant, within the topic assessments reported across the **ES Chapters [APP-052 to APP-074]** (updated where stated in the **Guide to the Application (Rev 6) [REP2-002]**), based on the assumed construction activities, such as in **ES Volume 1, Chapter 14: Noise and Vibration [REP1-021]**. It is noted that the Design Principles and Parameters document does not secure any specific design parameters for Work No. 4 as all of the required apparatus and equipment will be located within the existing Melksham

ExQ	Respondent	Question	Applicant's Response
			Substation (as opposed to a new or extended substation). Assessment of these works has still been possible based on construction assumptions and the design parameters for Work No. 5 which connects into Melksham Substation. A Grampian condition is not considered necessary to secure the works at the existing National Grid Melksham Substation, given they would be secured via the **Works Plan [REP1-005]** and the works description in Schedule 1 to the **Draft DCO [REP1-007]**. It is also noted that the Secretary of State, in the Decision Letter on the Springwell Solar Farm project [EN010149] confirmed that a Grampian condition would not be necessary, even though in that case, the National Grid substation that the Springwell project was to connect into did not yet exist and a planning application for it had not yet been submitted. As set out at paragraph 4.14 of the Decision Letter: *"The Secretary of State … does not agree that a restriction should be imposed restricting the commencement of the Proposed Development until [National Grid Navenby Substation] has been granted planning permission".*

ExQ	Respondent	Question	Applicant's Response
			This was on the grounds that the need case for the Springwell project was well established (through being Critical National Priority infrastructure) and that the applicant's assessment sufficiently met the policy requirements in NPS EN-1 and EN-3, such that there would be clear benefits to climate change, alternatives had been considered appropriately, and the requirements in relation to grid connection had been met. The Scheme is not reliant on a future National Grid substation, but is connecting into the existing Melksham Substation, requiring comparatively minimal works that fall within the ambit of National Grid's permitted development rights within its substations. As such, there can be even less justification for a Grampian condition than was confirmed to be wholly unnecessary by the Secretary of State on the Springwell project.
GCT1.5	The Applicant	**Transmission Losses** You are requested to provide details on the expected transmission losses from the solar PV sites to Melksham substation and from import and export to and from the BESS.	The Applicant provided its response to a similar question at Deadline 1A at Action Point 4 (electronic page 63 of 70) of the **Written Summary of the Applicant's Oral Submissions and Responses at Issue Specific Hearing 1 and Responses to Action Points [REP1A-012].** That response

ExQ	Respondent	Question	Applicant's Response
			applies to any energy transfer, in either direction, between the Existing National Grid Melksham Substation and the 400kV Substation, i.e. solar generation exported to the grid; energy exported from the BESS to the grid; and energy imported from the grid to the BESS. **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. 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 the examination of the Scheme. 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".

ExQ	Respondent	Question	Applicant's Response
			Paragraphs 3.2.6 to 3.2.7 of **NPS EN-1 (Ref 12)** establish the urgent need for new large-scale low-carbon infrastructure (such as the Scheme) 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 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 Scheme to that need, providing calculated figures for the current indicative design will not aid the examination of the Scheme. 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).

ExQ	Respondent	Question	Applicant's Response
			However, the Applicant can confirm that there will be losses, as there are with any line-length transmission of energy, between the Solar PV Sites and the 400kV Substation at Lime Down D, however these are all expected to be within industry normal ranges.
GCT1.6	The Applicant	**Mitigation Route Map** The applicant is required to provide a single document containing a mitigation route map of the controls and mitigation measures that have been identified across a number of documents, which the Environmental Statement and related control documents rely on to avoid, reduce and/ or offset significant impacts of the development. The route map should set out the specific impact requiring mitigation and the effect to be achieved (purpose of the mitigation), and the way in which the mitigation measures have been, or would be, translated into clear and enforceable controls, either via DCO Requirements, protective provisions, s106 obligations, other consent regimes, or side	The Applicant notes this comment and will prepare a Mitigation Route Map to expand on the Commitments Register to encompass the additional information required. As the measures set out in the outline management plans are still evolving in response to comments made during the Examination, this will be submitted at a future deadline.

ExQ	Respondent	Question	Applicant's Response
		agreements between the Applicant and a third party. The ExA note that the applicant has submitted a Commitments Register [REP1-114]; however, this is not expansive enough to provide an audit trail of the controls and mitigation measures on which the ES relies to avoid, reduce and where possible offset significant impacts of the development. The Applicant is advised that there are many examples of mitigation route maps provided in other NSIP applications, but Sizewell C Project and Byers Gill Solar Project libraries contain good examples of the format sought. The ExA considers that the current commitments register could be expanded to capture the additional information sought, or a separate document could be produced. Either way, the document should be updated as necessary throughout the examination and the final version should be included as a certified document in the dDCO. There is precedent for certification of such a document	

ExQ	Respondent	Question	Applicant's Response
		in the Lower Thames Crossing Development Consent Order.	
GCT1.7	The Applicant	**National Energy System Operator (NESO) Connection Dates** It is understood from SLD's WR [REP1-167] and confirmed by the Applicant in [REP1A-012], that a Gate 1 connection offer is available for the BESS. Given the wording of NPS EN-1 paragraph 4.11.12, the applicant is asked to provide an explanation as to how the ExA can be satisfied that appropriate network connections are in place for both the solar PV sites and the BESS. Given this apparent disconnect between delivery of both the solar PV sites and the BESS, would the applicant agree that the BESS is therefore not associated development in considering the Department for Communities and Local Government 'Guidance on associated development application for major infrastructure projects', April 2013?	NPS EN-1 (Ref 12) Paragraph 4.11.12 states that: *"The Secretary of State should be satisfied that appropriate network connection arrangements are/will be in place for a given project regardless of whether one or multiple (linked) applications are submitted"*. In its Post Hearing Note associated with Agenda Item 6.1 (electronic page 56 of 70) of the **Written Summary of the Applicant's Oral Submissions and Responses at Issue Specific Hearing 1 and Responses to Action Points [REP1A-012]** the Applicant noted that the **Grid Connection Statement [APP-270]** confirms that the Applicant is party to a grid connection agreement for both the solar and BESS components of the Scheme (latest NESO reference A/IGP15/21/2302/1EN (1)). The Applicant is expecting NESO to propose variations to that agreement as part of its Connections Reform process. NESO have provided some clarity on the Connections Reform process outcomes in

ExQ	Respondent	Question	Applicant's Response
			relation to Gate 1 projects[5]. The guidance explains that Gate 1 agreements will remain in place until the scheme is resubmitted to a future connections application window and meets the criteria for Gate 2, or the developer terminates the project. In Planning for New Energy Infrastructure (the government's consultation response to the new NPSs)[6] the government explains that *"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"*. It is the Applicant's view, which is consistent with the attributes of projects which can contribute to the Clean Power 2030 milestone, that this explanation applies to projects of all scales which require consent across all of the planning landscape, i.e. NSIPs and TCPA-consented schemes. The government has therefore committed to *"ensure that language*

[5] https://www.neso.energy/industry-information/connections-reform/gate-1-information

[6] https://assets.publishing.service.gov.uk/media/69121170bda892e068aa6454/nps-revisions-2025-consultation-government-response.pdf

ExQ	Respondent	Question	Applicant's Response
			used across government publications does not inadvertently constrain ambitious deployment of clean energy technologies" for example through the application of the Clean Power 2030 capacity ranges to the re-prioritisation of projects as part of Connections Reform (Ref 33). Therefore, and within the context of the new connections process, the Applicant maintains that its connection agreement is appropriate and expects it to remain appropriate for both the solar and the BESS. It is noted that paragraph 4.11.6 of NPS EN-1 (Ref 12) expressly contemplates the potential for an Applicant to take a commercial risk and progress seeking consent for a project that has not received or accepted a formal offer of a grid connection. It is clear that the risk that a grid connection is not available for a project, or part of a project, is not a reason to refuse consent. In respect of the NESO reforms, the Applicant understands that many proposed BESS projects received a Gate 1 offer, even where co-located with a solar project that received a Gate 2 offer. The Applicant

ExQ	Respondent	Question	Applicant's Response
			continues to hold a connection agreement for both aspects of the Scheme, and notes that receipt of development consent for the Scheme would provide further justification for the BESS element to secure a Gate 2 connection in a future re-prioritisation round. The Applicant further submits that the importance of consenting critical energy projects, even where uncertainty remains about the availability of a grid connection, can be seen in paragraph 4.14 of the Secretary of State's decision letter in the Springwell Solar Farm project [EN010149]. In the decision, the Secretary of State made it clear that there should be no restriction on the applicant commencing works until the National Grid substation that the project would be connecting into had been granted planning permission. It was confirmed that the applicant had a grid connection agreement with NGET for the project, and that NGET "as a regulated business, has a legal obligation to meet any requests for new power connections from developers that make such requests".

ExQ	Respondent	Question	Applicant's Response
			This approach can also be seen in the grant of the Five Estuaries Offshore Wind Farm [EN010115] and North Falls Offshore Wind Farm [EN010119], both due to connect into a new, not-yet-consented East Anglia Connection Node National Grid substation; and the Morgan Offshore Wind Project: Generation Assets [EN010136] which was granted development consent on 29 August 2025, whilst a separate application for development consent for that project's transmission assets [EN020032] was still in Examination. This was discussed in detail in paragraphs 4.14 to 4.23, including in the context of potential future development in the area. Further, NPS EN-3 (Ref 32) emphasises that the "government is supportive of solar that is "co-located with other functions (for example, agriculture, onshore wind generation, or storage) to maximise the efficiency of land use" (paragraph 2.10.10). It continues to note that this is particularly important where the project is sited on agricultural land, with paragraph 2.10.32 advising that consideration

ExQ	Respondent	Question	Applicant's Response
			may be given as to whether the project can be co-located with other functions, such as storage. The Applicant sees no disconnect between the delivery of the solar PV sites and the BESS. While the BESS Gate 1 status means that the connection location and date are not yet firm, that should not be taken to imply that they will be different to the firm location and date for the solar PV sites connection. The April 2013 associated development guidance (as relevant to this project) includes tests for: direct relationship, subordinacy, not only additional revenue and proportionality. However, in relation to timing, the guidance is not absolute and therefore does not preclude development which does not conform to the suggestion. The guidance states (Applicant's emphasis) that: *"It is expected that associated development will, in most cases, be typical of development brought forward alongside the relevant type of principal development or of a kind that is usually necessary to support a particular type of project"*.

ExQ	Respondent	Question	Applicant's Response
			The Applicant maintains its view that the BESS is associated development for the reasons stated below: <u>BESS as associated development</u> Paragraph 5 of the **Guidance on associated development applications for major infrastructure projects** describes four tests for associated development. The tests are: **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. **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

ExQ	Respondent	Question	Applicant's Response
			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. In the context of the Scheme, the following points are noted: **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.

ExQ	Respondent	Question	Applicant's Response
			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 which it connects and therefore is also demonstrative of a direct relationship between the BESS and the solar array. **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. Further, the BESS would operate in a subordinate fashion to the solar array, in that the output from the solar array would influence

ExQ	Respondent	Question	Applicant's Response
			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. 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). **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, NPS EN-3 states: *"Solar farms are one of the most established renewable electricity technologies in the UK and the cheapest form of electricity*

ExQ	Respondent	Question	Applicant's Response
			generation" (NPS EN-3 (2023) Para 2.10.10 and NPS EN-3 (2025) Para 2.10.5 (Ref 32)). 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 level of carbon free energy sent to the grid. **Proportionate in nature and scale**: The BESS is proportionate to the Scheme in nature and scale. This is because: 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

ExQ	Respondent	Question	Applicant's Response
			The footprint of the BESS is much smaller than the footprint of the solar array
GCT1.8	The Applicant	**Environmental Impact Assessment Methodology** ES Chapter 6 paragraph 6.7.7 [APP-058] states that, as a general rule, effects categorised as moderate or greater are considered significant, whereas those classified as moderate/minor or below are not. Table 6.5 further explains that moderate adverse effects are likely to be important at a local level and on their own or in combination of other effects, and could materially influence the decision-making process. In contrast, minor effects are described as unlikely to be critical in the decision-making process. Table 6.5 does not provide a definition of dual category classifications. This overlapping classification raises questions as to whether the distinction between significance categories is sufficiently clear or whether it introduces a degree of subjectivity that leaves the assessment open to the discretion of the assessor to downplay	The Applicant confirms that effects assessed as moderate or greater are considered significant, whereas effects assessed as moderate/minor or below are not considered significant. The purpose of the dual classification is to recognise that certain effects fall between two categories of significance, where the magnitude of impact and/or receptor sensitivity does not align precisely with a single category. A 'moderate/minor' effect represents an effect that is judged to be at the lower end of the moderate category (e.g. through the application of embedded mitigation) and/or the upper end of the minor category which would not pose a significant effect. This approach provides a precautionary and transparent means of distinguishing effects that do not meet the defined threshold, whilst still acknowledging where effects are approaching that level.

ExQ	Respondent	Question	Applicant's Response
		the effects. Against this backdrop, the ExA seeks clarification as to how an effect described as moderate/minor can simultaneously be considered both significant and not significant.	The Applicant does not consider that this approach introduces undue subjectivity or allows for the downplaying of effects. It has been applied in other consented Solar NSIPs, including Cottam Solar Project [EN010133] and West Burton Solar Project [EN010132]. An example is presented for Grade II Listed Fosse Lodge (NHLE: 1198366), located to the south of Lime Down C. Following the application of embedded mitigation, which includes the removal of panels from Field C10, offsets away from approach fields and enhancement screening of existing hedgerows and tree belts, **ES Volume 3, Appendix 12.1: Heritage Statement [APP-219]** identified that there was a potential for less than substantial harm (at the lower end). Using the methodology established in Tables 12-3 to 12-5 in Section 12.6 of **ES Volume 1, Chapter 12: Cultural Heritage [APP-064]**, this equates to a low magnitude of impact, which for an asset of medium sensitivity results in a moderate / minor adverse effect. With consideration to the low magnitude of impact the adverse effect is not considered to be

ExQ	Respondent	Question	Applicant's Response
			significant. The code LM relates to Hedgerow Reinforcement.
GCT1.9	The Applicant	**BESS Units – Operation** A number of IPs, for example [REP1A-063], state that the BESS would charge overnight using electricity generated by gas turbines supplying the National Grid. The Grid Connection Agreement referred to in the Grid Connection Statement [APP-270] allows for the import of up to 250 MW of electrical energy to be stored in the BESS and to be exported at a different time, back to the grid. This implies that half of the BESS capacity is installed to service the existing grid and is not therefore associated development. Would the applicant agree with this suggestion? In addition, as the BESS element of the Scheme has been re-prioritised as part of NESO's connection reform activities as Gate 1 (as yet unconfirmed indicative connection date), how can its inclusion and retention in the project and at the proposed size be justified?	**Overnight charging from gas** **Paragraph 3.4.1 of ES Volume 1 Chapter 3: The Scheme [APP-055]** explains that the operation and maintenance phase of the Proposed Development is anticipated to commence in 2029. **Section 2.9 of the Statement of Need [REP1-085]** explains that it is governments aim to deliver a clean power system by 2030 and keep the power system clean thereafter; and that means over 95% of total GB generation is from clean sources. In an electricity system with these characteristics, gas turbines will be balancing power only when low-carbon sources, including flexible sources and storage, are not able to meet demand. The Clean Power 2030 Action Plan (Ref 33) states that: *"Between 40-50 GW106 of dispatchable long-duration flexible capacity could be needed by 2030. Whilst we expect the majority of this capacity will come from unabated gas, it will be running less frequently as we support the deployment of low carbon alternatives and approach 2030"*. (page 110).

ExQ	Respondent	Question	Applicant's Response
			Even in the current energy system, gas turbines run less when demand is lower, and when low-carbon energy supplies are higher. Paragraph 8.3.4 of the **Statement of Need [REP1-085]** provides NESO's view of the future electricity system: *"Traditionally, risks to meeting electricity security of supply, have been at times of high demand [however] as we move to higher volumes of weather-dependent renewable energy, we will also face additional challenges around both the oversupply and undersupply of renewable generation"* (NESO Future Energy Scenarios (Ref 34), p99). Storage assets support the operation of the renewable technologies they are co located with by storing energy when it is generated in abundance and releasing it later when it is needed. The BESS is proposed as associated development to the main solar sites to support their operation by storing abundant energy and releasing it when it is needed. At times when it is not needed to support the solar the BESS would perform the same task to the benefit of

ExQ	Respondent	Question	Applicant's Response
			the grid and consumers. **Figures 20 to 23** of the **Statement of Need [REP1-085]** provide illustrative but non-exhaustive examples of such operations. Section 9.2 of the Applicant's **Statement of Need [REP1-085]** provides an explanation on the mechanics of pricing in the GB electricity market, which by extension explains why BESS support co-located schemes by storing energy when supply is stronger than demand, and release that energy when demand is stronger than supply. This action is to the benefit of the GB consumer through supporting security of supply, providing downward pressure on prices at times of low renewable generation, and increasing the proportion of low-carbon energy used to meet demand. The Applicant considers that overnight charging of a BESS with electricity supplied from gas turbines is a very insignificant, remote and commercially irrational hypothesis. In all but the most remote and most unlikely circumstances, it would be much lower risk and lower cost for gas turbine operators to keep energy in a fossil fuel form until it is

ExQ	Respondent	Question	Applicant's Response
			needed, rather than incurring efficiency- and conversion- related losses associated instead with burning that fuel, generating electricity, transmitting electricity to the BESS and storing it there for later dispatch. This is because doing so would make the "stored then dispatched" energy more expensive than any energy generated directly from the fossil fuel if at any later time it was needed. <u>Use of BESS capacity</u> It is incorrect to imply from the 250MW import capacity (a measure of the maximum instantaneous level of power the BESS can draw from the Grid) that 'half the BESS capacity is installed to service the existing grid.' Instead, it would be correct to state that: **Paragraph 7.10.30** of **ES Chapter 7 Climate [APP-059]** explains that a 1,000 MWh BESS (energy storage capacity) has been assessed. All of the energy storage capacity could be used by either energy generated by the solar panels or imported from the grid (up to the energy capacity limit). The import power

ExQ	Respondent	Question	Applicant's Response
			capacity of the grid connection means that the BESS could charge from the grid at a maximum of 250MW (i.e. would take 4 hours to go from empty to full). However, the BESS could export power to the grid (whatever the origin of its stored energy) at a maximum of 500MW (i.e. would take 2 hours to discharge). The Applicant set out its reasoning for including BESS as associated development orally in ISH1 and at Deadline 1A at Agenda Item 4.1 (electronic page 14 of 70) of the **Written Summary of the Applicant's Oral Submissions and Responses at Issue Specific Hearing 1 and Responses to Action Points [REP1A-012]**. <u>Justification for BESS at size proposed</u> The UK policy view is that a low-cost, net zero consistent system is likely to be composed predominantly of wind and solar (NPS EN-1 (2023), Para 3.3.20 and NPS EN-1 (2025) Para 3.3.23). Flexible assets, including storage, are also needed to balance supply with demand (Para 3.3.25 of both NPS EN-1 (2023) and NPS EN-1 (2025)). National policy

ExQ	Respondent	Question	Applicant's Response
			is supportive of solar that is co-located with storage to maximise the efficiency of land use (NPS EN-3 (2023), Para 2.10.10). Table 1 of the **Statement of Need [REP1-085]** sets out government's Clean Power capacity ranges for 2030 and 2035 and notes that a capacity range has been established specifically for battery storage. Further, the Government confirmed in its 2025 consultation response to Planning for New Energy Infrastructure (Ref 35) that: *"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."* The Applicant confirms that the Clean Power capacity ranges have been incorporated into NESO's connections re-prioritisation process to assess 'strategic alignment' and inform a project's gate status and position in the newly reforming connections queue. The Applicant's view remains that the need for storage as established in Clean Power 2030 Action Plan and supported by the policy

ExQ	Respondent	Question	Applicant's Response
			positions described above, applies to the Scheme, regardless of its gate status, and this justifies the retention of storage in the application as associated development. Finally, the Applicant's view is that the scale of BESS proposed is appropriate for and proportionate to the Scheme because: 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.
GCT1.10	The Applicant	**BESS – Import/ Export Allowance** The ExA is seeking to understand how the contractual caps on the proposed development are controlled (export of the electricity produced at the Solar PV Sites not to exceed 500 MW and import from the grid and subsequent export back to the grid of 250	The Applicant's grid connection agreement allows it at any point in time to import up to 250MW of power (an instantaneous measure) or export up to 500MW of power (also an instantaneous measure) from or to the National Electricity Transmission System (NETS) through a single connection. While the

<table>
<tr><th>ExQ</th><th>Respondent</th><th>Question</th><th>Applicant's Response</th></tr>
<tr><td></td><td></td><td>MW). Does this mean that the agreement is for 750 MW export?

Please explain how the grid import/export allowance works in practice.</td><td>import can only flow from the NETS to the BESS, the export could either from the Solar PV Sites, or the BESS, or both simultaneously, provided that the total power export at any point in time, summed from all sources (BESS + Solar) does not exceed 500MW.

In summary: the agreement is for 500MW export.</td></tr>
<tr><td>GCT1.11</td><td>The Applicant</td><td>Land Availability and GHG Assessment

Paragraph 5.1.2 of the SoR [APP-018] states that option agreements have been entered into with each of the owners of 8 landholdings that make up the 5 solar PV sites. The length of those option agreements was discussed briefly at Issue Specific Hearing 1, and it was identified that the applicant cannot confirm that it has secured options over all of the solar PV sites to cover the 60-year lifetime of the project.

You are asked to provide a breakdown of land parcels within the solar PV sites which have not been secured in option agreements for</td><td>(1)

To assist the ExA, the Applicant has sought the agreement of the relevant option holders to disclose the maximum lease term applicable to each area of the Solar PV Sites. Where consent to disclosure has been obtained, the relevant terms are set out below.

<table><tr><th>Solar PV Site</th><th>Maximum lease length</th></tr><tr><td>Lime Down A</td><td>40 years</td></tr><tr><td>Lime Down B (Solar PV infrastructure areas only)</td><td>40 years</td></tr></table></td></tr>
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<table>
<tr><th>ExQ</th><th>Respondent</th><th>Question</th><th>Applicant's Response</th></tr>
<tr><td></td><td></td><td>the lifetime of the project, along with the timeframe that has been secured.

While the ExA appreciates that you are seeking the fallback of CA over all of the solar PV land parcels, which means you could secure a 60 year operating period over them, it was made clear to the ExA at Issue Specific Hearing 1 that in circumstances where you are unable to extend the term of a lease by agreement, the relevant part of the scheme would be required to be decommissioned earlier than the maximum 60 year lifespan (because by then it would be time barred from employing CA powers). Based upon that, the ExA would like you to explain whether a reduced operating capacity on those affected land parcels has been factored into the lifetime GHG assessment.

Please also explain what implications may arise when those affected land parcels are required to be decommissioned but contain supporting infrastructure for other parts of the project, which remain in operation.</td><td><table><tr><td>Lime Down C</td><td>40 years</td></tr><tr><td>Lime Down D (Solar & Substation land)</td><td>42 years</td></tr><tr><td>Lime Down D (Solar & BESS areas)</td><td>40 years</td></tr><tr><td>Lime Down E</td><td>40 years</td></tr></table>(2) The Applicant acknowledges the comments it made in ISH1 and confirms this is still its position. The Applicant has included the GHG assessment at 40 years in the Climate Response to Wiltshire Council Appendix B of Written Rep and SLD Appendix J1 [EN010168/EXAM/9.33]

(3) In the scenario where the Applicant is unable to voluntarily extend the length of the Lease for a parcel of land which houses critical infrastructure required for the remainder of the Scheme, the Applicant will attempt to seek both all necessary consents and voluntary agreement at the time, to relocate the infrastructure elsewhere to enable the ongoing operation of the wider Scheme. If the Applicant is unable to do so, then any Sites which rely on such infrastructure will also be</td></tr>
</table>

ExQ	Respondent	Question	Applicant's Response
			decommissioned. Alternatively, if a parcel is required to be decommissioned, and its decommissioning does not affect the operation of the wider Scheme, then assuming it is still viable to do so, the wider site will remain in operation, at the Applicant's discretion.

2.11 Habitat Regulations Assessment

ExQ	Respondent	Question	Applicant's Response
HRA1.1	Natural England	**Survey Work** Given the original HRA [APP-275] submitted into the examination did not have the benefit of 17ha worth of survey work (the ExA note the missing survey work has now been submitted into the examination), does not provide specific details contained in the BNG Assessment Report [REP1-089] regarding hedgerow removal, and lacks specific surveys to fully inform functionally linked land (FLL) to the Bath and Bradford-on-Avon Bats Special Area of Conservation (SAC), is Natural England confident a positive assessment of the HRA can be made? The ExA asks that you justify your response.	Question not directed at the Applicant.
HRA1.2	The Applicant Natural England	**Bath and Bradford-on-Avon SAC** Following Natural England's WR [REP1-156] regarding their position on bats and the ability for Lime Down C to provide FLL for lesser horseshoe bats associated with the Bath and Bradford-on-Avon Bats SAC, the applicant and	Further to Natural England's Written Representation, the Applicant met with Natural England on 18 May 2026. Following this meeting the Applicant has agreed to assess Lime Down C as potentially representing functionally linked land for lesser horseshoe bats associated with the Bath and Bradford-on-Avon Bats SAC. An updated version of the

ExQ	Respondent	Question	Applicant's Response
		Natural England should provide an update on their discussions. It is also noted that Natural England and the applicant have agreed mitigation measures to reduce the harm on bats. <u>Both Parties:</u> Both parties should comment on what discussions took place with regard to avoiding any impacts on the SAC, before discussing and agreeing mitigation measures. <u>The applicant:</u> In addition to the above, the applicant is asked to provide details as to how the mitigation measures would be secured through the dDCO.	**Habitat Regulations Assessment Report [APP-275]** has been prepared accordingly and submitted at Deadline 3. Natural England have reviewed the updated version of the Habitat Regulations Assessment Report to be submitted at Deadline 3 and have confirmed via email to the Applicant on 12 June 2026 that the position between both parties on the ability for Lime Down C to provide FLL for lesser horseshoe bats associated with the Bath and Bradford-on-Avon Bats SAC is now agreed. Furthermore, Natural England and the Applicant have reached agreement on the mitigation measures which would need to be included within Lime Down C to ensure that significant impacts to SAC lesser horseshoe bats resulting from fragmentation could be avoided. The Statement of Common Ground between the applicant and Natural England Wiltshire Council [REP2-026] records the agreement reached on this matter. These agreed measures comprise: a. Retention of hedgerows across Lime Down C with any required new gaps in

ExQ	Respondent	Question	Applicant's Response
			hedgerows to be limited to a maximum of 10m with the exception of one larger gap of up to 18 m for the proposed access off the Fosse Way. b. Construction Lighting will be controlled to prevent light spill onto suitable commuting habitats. The **Outline EPMS [REP1-106]** details how sections of hedgerow to be permanently removed for new internal access tracks where no existing gap is present will typically be between 3.5 m to 6 m wide, with a maximum of 10 m of hedgerow to be removed in any one location for this element of the Scheme. It also details how sections of hedgerow to be removed to provide access from the existing highway network, including for Abnormal Indivisible Loads (AIL) will require a maximum of 18 m of hedgerow loss at any one access point, although would typically be less than this at most access points. At Lime Down C, one AIL Location is present at Solar PV Access Location 19 **(ES Volume 2, Figure 13-11 Construction Access Locations: Solar PV Sites [APP-156]**).

ExQ	Respondent	Question	Applicant's Response
			Appropriate limitations and controls for the use of artificial lighting during construction, designed to avoid impacts on bats and other light-sensitive species are detailed within the **Outline EPMS [REP1-106]** as well as the **Outline CEMP [REP2-019]**. Measures set out within the **Outline EPMS [REP1-106]** and the **Outline CEMP [REP2-019]** are secured by Requirements 8 and 13 respectively within the **draft DCO [REP1-007]**. With regard to avoiding impacts on the SAC, previous consultation between the Applicant and Natural England included discussion on how buildings with potential to support roost sites for lesser horseshoe bats would be retained and protected as part of the Scheme. Natural England noted there may be potential for loss of access potential roost sites from Solar PV Panel installation, following which the Applicant confirmed that likely field boundaries habitats used for commuting would be adequately buffered to maintain connectivity. The Scheme has been designed with a minimum 15 m buffer from hedgerows and

ExQ	Respondent	Question	Applicant's Response
			woodland as secured within the **Outline EPMS [REP1-106]**. In addition, the Applicant and Natural England previously discussed how in-field habitats at Lime Down C, which can be expected to be most impacted by the installation of Solar PV infrastructure, were unlikely to represent key foraging habitat for populations of bats associated with the SAC. The majority (over 90%) of land within Lime Down C comprise arable fields which are of low value for foraging bats, being typically associated with a low abundance and diversity of invertebrate prey. The Applicant and Natural England were in agreement that consequently, the installation of Solar PV infrastructure within these fields were unlikely to result in significant adverse effects on the SAC through loss of foraging habitat.

2.12 Health and Wellbeing

ExQ	Respondent	Question	Applicant's Response
HW1.1	Wiltshire Council	**Mental Health and Wellbeing** The ExA note that in your submission at Procedural Deadline A [PDA-014] there is reference to a good practice Supplementary Planning Document by Suffolk County Council relating to community engagement and wellbeing. Please submit this document into the examination and advise if any discussions have been had with the applicant on producing something similar and securing it within the dDCO.	The Applicant can confirm that Suffolk County Council's Energy and Climate Adaptive Infrastructure Policy: Community Engagement and Wellbeing Supplementary Guidance Document (SGD) has been shared and discussed in meetings between the Applicant and Wiltshire Council's Public Health Team during pre-submission engagement (Ref 36). This document has been provided within the Deadline 3 submission package. Given the guidance primarily focusses on pre-submission community engagement, it is not considered to be directly relevant to the post-consent engagement process. There are also challenges about how best to frame any commitments to implement the guidance, given it sets out a more high level, principled approach to engagement (rather than specific commitments that developers are expected to adhere to). Irrespective, the Applicant is committed to exploring with Wiltshire Council how best to embed the principles of this guidance into engagement moving forward in a way that is both clear and enforceable, but it

ExQ	Respondent	Question	Applicant's Response
			would not be appropriate to include direct reference to this guidance within a DCO requirement or management plan given the nature of its contents. However, if Wiltshire Council can specify what specific engagement principles from the guidance it considers should inform the Community Liaison Group, the Applicant can consider how best to secure these at a future deadline (for example through relevant management plans).
HW1.2	The Applicant	**Alternative Access to Public Rights of Way Network** Further to the assessment of the impacts on health and wellbeing in ES Chapter 18 [APP-070], have you considered the prospect of displacement and alternative points of access to the PRoW network for those users who do not wish to experience the construction, operation, maintenance or decommissioning aspects of the proposed development without losing the benefit of being outdoors.? If not, the applicant is asked to undertake this assessment to demonstrate how adverse impacts resulting from the proposed	The Applicant confirms that the assessment of impacts to PROW users with respect to health and wellbeing has considered changes to access to the PROW network and changes to PROWs affected by the Scheme as assessed in **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**. Displacement from one PROW to another has therefore not specifically been assessed, however consideration of overall impacts to PROWs across the 2 km Study Area have been used to give a summarising level of effect. This has then been considered in respect to the experience for users, and the extent to

ExQ	Respondent	Question	Applicant's Response
		development could be minimised on existing users of the PRoW network by signposting and improving routes away from the solar PV panels. This question should be considered with ExQ1 GCT1.2 regarding Wiltshire Council's request for s106 contributions to address displacement and PRoW linkages.	which this would dissuade physical use or reduce mental wellbeing benefits from access to the countryside in **ES Volume 1, Chapter 18: Human Health [APP-070]**. In response to the request, the Applicant will provide an additional technical note on displacement effects that can be identified on the PROW network affected by the Scheme at Deadline 4. The Applicant will also seek to use this time to discuss the outcomes of this assessment with Wilshire Council's PROW team and will present any discussions undertaken in the next iteration of the Statement of Common Ground.
HW1.3	Wiltshire Council The Applicant	**Mental Health** ES Chapter 18 table 18-7 [APP-070] states that emergency hospital submissions resulting from self-harm in the study area are higher than the UK average. <u>Wiltshire Council:</u> Given the level of public concern and interest generated by the proposed development, the Council is asked to comment on whether the	Discussions involving the Applicant's approach to signposting of mental health services during the DCO application process were undertaken primarily with Wiltshire Council's Public Health team, with whom the Applicant undertook several virtual meetings over the pre-submission stages. Whilst the approach was not specifically agreed, the Applicant sought to include recommendations from Wiltshire Council's Public Health team wherever practicable, albeit bound to the existing level

ExQ	Respondent	Question	Applicant's Response
		applicant's proposed mitigation of signposting those with concerns to existing mental health services is sufficient? <u>The applicant:</u> You are asked to detail any discussions you have had with the existing services referenced in ES Chapter 18 that have informed the approach.	expertise within the Applicant's team at the time those discussions were held. The extent, details and outcomes of these discussions were published at Table 18-2 of **ES Volume 1, Chapter 18: Human Health [APP-070]**. The Applicant furthermore seeks to clarify that this approach to signposting mental health services has been undertaken for matters raised during the pre-submission stages and DCO application process, rather than being as a result of the construction, operation, and decommissioning of the Scheme. Hence, it has not been assessed separately in the ES as it falls outside the temporal scope of assessment. Mental health mitigation, including design measures, protection of PROWs, and commitment to ongoing community engagement through the construction, operation and decommissioning of the Scheme are set out in the establishment of the Community Liaison Group, the **Design Principles and Parameters [REP1A-008]**, **Outline LEMP [APP-283]**, **Outline CEMP [REP2-019]**, **Outline OEMP [REP2-021]**, **Outline PROWPPMP [REP1-104]**, and

ExQ	Respondent	Question	Applicant's Response
			Outline Decommissioning Strategy [REP1-100]. These are secured by Requirements 4, 5, 7, 13-16, and 20 of Schedule 2 to the **Draft DCO [REP1-007]**. During non-statutory consultation in September 2024, the Applicant reached out by direct email contact to NHS Bath and North East Somerset, Swindon and Wiltshire Integrated Care Board, Royal United Hospitals Bath NHS Foundation Trust, and South Western Ambulance Service NHS Foundation Trust as the designated NHS service providers known to operate over northwest Wiltshire. As stated in **ES Volume 3, Appendix 18-1: Matters Relevant to Human Health Raised Through Consultation [APP-244]**, no response was received by the Applicant team directly, nor through the non-statutory consultation process. During statutory consultation, the same providers, as well as NHS Bristol, North Somerset and South Gloucestershire Integrated Care Board, Great Western Hospitals NHS Foundation Trust, North Bristol NHS Trust, Wiltshire Heath and Care NHS partnership, Avon and Wiltshire

ExQ	Respondent	Question	Applicant's Response
			Mental Health Partnership NHS Trust, and NHS England were contacted as Section 42 prescribed consultees and statutory undertakers relevant to health. This is demonstrated in **Consultation Report Appendix G-1: Statutory Consultation under Section 42 of the Planning Act 2008 [APP-041]**. No responses were recorded by any of these contacted prescribed consultees and statutory undertakers and as such they are not featured in **Consultation Report Appendix G-5: Section 42 Applicant Response Tables [APP-045]**. This absence of interaction from service providers indicated to the Applicant that said service providers were not specifically concerned with the Scheme having an impact on their ability to deliver their services to the affected population. As such, the Applicant focussed on discussing an appropriate approach with Wiltshire Council's Public Health Team.

2.13 Landscape and Visual

ExQ	Respondent	Question	Applicant's Response
LV1.1	The Applicant	**Landscape Fabric – Quantifying Loss and Provision** Wiltshire Council raises concern in its LIR [REP1-137] that effects to landscape fabric are under-assessed. SLD also raises concern in its D1 submission [REP1-170] that mitigation measures have been double counted as enhancement. Table 8-15 and 8-16 in the ES [APP-060] present the proposed planting as landscape enhancements but the same overall figures for each planting typology in Table 8-16 are identified as mitigation measures in Table 8-18. To provide clarity surrounding the effects to landscape fabric and the extent to which proposed planting is for the purposes of mitigation or enhancement, the applicant is asked to quantify the following by planting typology: 1) Loss of landscape fabric components. 2) Additional landscape fabric components, including both mitigation and enhancement measures. 3) Extent of proposed planting under point 2) above that would be required for the	It is noted in Paragraph 4.35 of Ref 5Ref 30Ref 6OBJRef 6OBJ). However, due to the Scheme's location on the edge of the CNL avoidance measures have been incorporated into the Scheme Design as part of the Mitigation Hierarchy as set out in Section 8.9 of the LVIA. This includes: • Avoiding development adjacent to the National Landscape where it would affect its setting; and • Avoiding development where it would be visually intrusive and affect the character and visual experience of the landscape. There were 3 options relating to the how to manage these land parcels. These include: Option 1 - to remove the entire field from the Scheme; Option 2 - to maintain hedgerows within the red line boundary and remove the field; or Option 3 - to retain the whole parcel within the Scheme.

ExQ	Respondent	Question	Applicant's Response
		purpose of mitigating adverse landscape or visual effects. 4) Extent of proposed planting under point 2) above that would be for enhancement only.	Option 3 was applied to Site A: The northern part of A1, A11 and A12; Site B: B12; and Site C: C1, C6, C8, part of C9 and the majority of C10. These fields, within the setting of the CNL, provide opportunities for positive enhancement (including new hedgerows and wildflower meadows) to further the purposes of CNL. It is recognised by the Applicant that 'enhancement' measures described above are distinct to the embedded mitigation measures as set out Table 8-15 and 8-16 in the **ES [APP-060]**. Although the tables are titled differently, they provide the same information as each other. The Applicant will provide an update to the **LVIA [APP-060]** to rename Table 8.15 and 8.16 and Paragraph 8.9.37 from Landscape Enhancement to Landscape Mitigation to align with Table 8-18. In Response to Questions 1-4, the Applicant has provided a tabulated response to Questions 1-4 attached as Appendix LV1-1 This includes a plan of the enhancement measures on the edge of the CNL.

ExQ	Respondent	Question	Applicant's Response
LV1.2	Wiltshire Council	**Landscape Fabric – Technical Note** Wiltshire Council states in its LIR [REP1-137] that the very large-scale land use change combined with the discordant industrialising nature of new introduced development would significantly and adversely impact upon the receiving landscape fabric baseline condition at a site and local level. The applicant provided a technical note on landscape fabric and landscape character [REP1-121] at D1 with the intention of clarifying its approach to the assessment of landscape fabric and landscape character. The technical note explains that the applicant has separated the assessment of landscape fabric as the assessment of the physical elements and features within the Order limits from the assessment of effects on landscape character. Wiltshire Council is asked: 1) Whether it agrees with the application of the applicant's methodology set out in the technical note? 2) If so, do Wiltshire Council agree with the applicant's assessment of landscape fabric effects in the ES [APP-060] or do Wiltshire Council maintain that the	Question not directed at the Applicant.

ExQ	Respondent	Question	Applicant's Response
		effects to landscape fabric have been under-assessed by the applicant?	
LV1.3	The Applicant	**Landscape Fabric - Hedgerow Heights** It is not currently clear which hedgerows, either existing or proposed, would be managed to a height of 4.5m. It is also not clear what would happen to these hedgerows at decommissioning. For example, the oDS [APP-279] states that it is likely that established habitats such as hedgerows and woodland would be retained by the landowner, whereas in response to Wiltshire Council's RR [PDA-009] the applicant states that any adverse impact of hedgerow height on landscape or visual receptors would not be significant or permanent as hedgerows could be clipped low again following decommissioning. The applicant is asked: 1) To provide a plan showing the location and length of hedgerows which would be managed to a height of 4.5m or alternatively annotate the Tree Protection Order and Hedgerow plan [APP-011] with this detail. 2) If the proposal is to reduce the height of hedgerows at decommissioning to ensure that resultant adverse visual and	**Response to Question 1** The Applicant has annotated the **Tree Protection Order and Hedgerow plan [APP-011]** showing hedgerows which would be managed to a height of 4.5m. **Response to Question 2** Hedgerow management post decommissioning will be secured within the **Outline Decommissioning Strategy (Rev 2) (Clean) [REP1-100]** as detailed in the **Outline LEMP[APP-283]**. Following successful removal of panels and associated infrastructure, all hedgerows within the Order Limits will be assessed to consider best ecological and land management practices applicable at the time of decommissioning. Consideration should be given to hedgerow heights, widths, overall plant health, species diversity, landscape character, visual amenity,

ExQ	Respondent	Question	Applicant's Response
		landscape impacts would not be significant or permanent, to confirm how that would be secured in the control documents.	as well as use by protected or notable wildlife species etc. If appropriate at the time, measures to reduce the height of hedgerows to their current would take place during the two-year decommissioning phase and would be programmed to follow the removal of infrastructure to ensure that landscape and visual effects are as assessed in the LVIA. Any cutting to reduce heights of hedgerows would take place outside of the key nesting bird season in line with best practice.
LV1.4	The Applicant	**Landscape Fabric – Beneficial Effects** The ES [APP-060] states there would be moderate beneficial effects to landscape fabric from year 15 of the operational phase and in the decommissioning phase as a result of	**Question 1 Response** The LVIA in **ES Volume 1 Chapter 8 [APP-060]** has assessed Landscape Fabric and Landscape Character independently. Landscape Fabric relates only to land within

ExQ	Respondent	Question	Applicant's Response
		proposed planting measures. The applicant is asked: 1) Can this be considered a benefit of the proposed development in relation to landscape effects if it would only be there to provide mitigation screening for a large-scale solar development which itself would have significant adverse effects on landscape and visual receptors? 2) If proposed planting measures are deemed inappropriate to the character of the receiving landscape due to size or species mix proposed, can it be considered to be a landscape fabric benefit?	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, whereas Landscape Character is a distinct, recognisable, and consistent pattern of elements in the landscape that makes one landscape different from another, rather than better or worse. The methodology used in the LVIA has been developed in response to the increasing number of large-scale solar farms where there is potential for large scale landscape change. 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 influencing the separate assessment on Landscape Character. Keeping this assessment independent of the assessment of Landscape Character avoids for any 'double counting'. It is noted, NPS EN-1 recognises at para 5.10.5 that "Virtually all nationally significant energy infrastructure projects will have

ExQ	Respondent	Question	Applicant's Response
			adverse effects on the landscape, but there may also be beneficial landscape character impacts arising from mitigation". Large Scale Solar developments are unusual in that due to the 'overlaid' nature of the development, the scheme can be delivered with minimal vegetative losses, and substantial vegetative gains. Conversely, if a scheme were to result in the opposite conclusions, e.g., substantial vegetative losses of a similar scale to those gains provided by a large scale solar scheme, it would only be appropriate that this was recognised within the LVIA. The LVIA takes account of this through the assessment on Landscape Fabric. The physical change in land use as a result of the development to the fabric of the landscape is from arable farmland to grassland (albeit below solar infrastructure). A solar scheme is essentially 'overlaid' across a landscape and is considered reversable (the infrastructure would be required to be removed at the end of the lifetime of the consent): This allows the important landscape features such as hedgerows, trees and watercourses to remain

ExQ	Respondent	Question	Applicant's Response
			and continue to contribute to the landscape character of the receiving area. The introduction of ground mounted solar infrastructure does not change the physical fabric of the land within the Site to the same extent as a quarry scheme or a residential development for example. **Response to Question 2** It is recognised that developments of this nature directly change the character of the landscape within the boundaries of the Site itself, with the individual fields proposed for infrastructure presenting as a solar array, a change from a 'greenfield' open agricultural farmland to renewables. The assessment of Landscape Character (and Visual Amenity) also recognises the adverse effects associated with the proposed high hedgerows required to provide screening of the Array and associated infrastructure. This change is what then ultimately indirectly impacts the character of the wider receiving landscape. It should be noted that this change is not limited to renewable projects, and that any development of a greenfield site would

ExQ	Respondent	Question	Applicant's Response
			result in the same level of adverse impact at the site level. The Landscape Character change associated with the addition of the array and associated infrastructure is considered within the assessment of effects on Landscape Character. For further details of losses and gains to the Landscape Fabric please refer to Appendix LV1.1 attached.
LV1.5	Wiltshire Council	**Landscape Fabric – Enhancement Opportunities** Do Wiltshire Council consider that the applicant's proposed planting measures would contribute to the enhancement opportunities as identified in the Broad Management Objectives for Landscape Character Type (LCT) 16: Limestone Lowland Landscape Character Area (LCA) (16A: Malmesbury-Corsham Limestone Lowlands) and the management guidelines and strategy actions for LCA8: Hullavington Rolling Lowland?	Question not directed at the Applicant.
LV1.6	Wiltshire Council	**Landscape Character – Assessment Methodology**	**Response to Question 1** GLVIA3 sets out that 'An assessment of landscape effects should consider how the

ExQ	Respondent	Question	Applicant's Response
	Stop Lime Down The Applicant	In the ES [APP-060] the applicant has assessed effects to landscape character relative to each study area (1km, 2km, 5km) as a single receptor rather than each of the separate landscape receptors (LCTs, LCAs) that make up each study area. The ExA understands that the intention of this approach is to look at the effects of the proposed development on the holistic patchwork of landscape character within each study area. However, it is not clear to the ExA that this approach captures the impacts on the different landscape receptors and the individual characteristics identified in the relevant landscape character assessments. Wiltshire Council and SLD: Wiltshire Council and SLD are asked if they consider that the applicant's approach is acceptable? The applicant: The applicant is asked to either: 1) Provide further justification for its approach including reference to relevant guidance and precedent from other Nationally Significant Infrastructure Project (NSIP) scale solar projects; or	proposal will affect the elements that make up the landscape, its aesthetic and perceptual aspects, its distinctive character and the key characteristics that contribute to this.' (Ref 29). GLVIA3 does not suggest that an LVIA should consider individual Landscape Character Areas (LCAs) or Landscape Character Types (LCTs) as individual Landscape Receptors, rather that LCAs / LCTs are used to identify the Baseline. GLVIA3 sets out that the 'study area should include the site itself and the extent of the wider landscape around it which it is likely that the proposed development may influence.' And that 'This will normally be based on the extent of Landscape Character Areas likely to be significantly affected either directly or indirectly' not that these LCAs should be identified as individual receptors. The Study Areas have been informed through a combination of desktop study, as well as professional judgement on similar scale projects. They have been established through consideration of the existing landform and vegetation, as well as the scale of the Scheme

ExQ	Respondent	Question	Applicant's Response
		2) Provide an updated assessment defining the effects relative to the separate landscape receptors rather than to each study area as a whole.	and heights of the proposed infrastructure and the potential for significant effects. Identification of the Study Areas has considered the diminishing nature of visual perception as distance from visual receptors increases. As a result, the proposed Study Areas for visual receptors are smaller than the proposed Landscape Study Areas, which consider the interconnectivity of the wider landscape context. It is important to note that the impact of changes to the landscape can appear different depending on the scale at which they are assessed. For example, a development that fundamentally changes the character of a small geographic area when considered against a very large National Character Area (NCA) could be argued to only result in Negligible effects to the overall character of the NCA. However, when assessed against a LCA /LCT that were not much greater than the size of the development itself, the effects could be considered Major. However, the actual landscape change in both scenarios is the same, it is just the arbitrary use of a man-made

ExQ	Respondent	Question	Applicant's Response
			line, and defined area that is used to assess the level of effect that changes the findings. This can be particularly misleading when looking at more local scale LCAs / LCTs where assessments use the same approach, and use the scale / size of the LCA / LCT to 'justify' the magnitude of change, e.g., 'effects are only apparent across a small part of the LCA, and so effects must therefore be Minor…' Professional experience, which has included testing this approach on similar DCO projects (the Applicant directs the ExA to the Green Hill Solar Project -Application ref: EN0101700.) has derived an LVIA Methodology that used Study Areas to undertake an assessment of impacts arising from a development on Landscape Character. The LVIA uses 1km, 2km and 5km Study Areas to examine Landscape Character harm associated with the Development and the extent to which effects on Landscape Character extend from the Scheme. Due to the interconnected relationship landform has, the assessment for each Study Area considers the effect of the Scheme on the

ExQ	Respondent	Question	Applicant's Response
			landscape as a single receptor, made up of all of the LCAs / LCTs within the Study Area. these LCAs / LCTs are used to inform the Baseline within each of the Study Areas against the effects of the Scheme are assessed, for example all National Character Areas and all County and District Landscape Character Types and Areas within the individual Study Areas. This approach ensures that the assessment looks at the effects of the Scheme on the unique holistic patchwork of landscape character within each Study Area and avoids focusing the assessment on the effects to individual local or national LCAs where it would be difficult to then ascertain the effect of the Scheme on landscape character as a whole. When considering how these changes affect the broader landscape character within the 1km Local Study Area, the 2km Wider Study Area and the 5km Outer Study Area, the significance may be greater or diminish over distance. Small alterations to the landscape components within a Site may disrupt or

ExQ	Respondent	Question	Applicant's Response
			support the overall patterns and distinctive character that define the landscape character of the area. **Applicant response to Question 2** On the basis of the above, the Applicant does not consider that an update to the assessment relative to the separate landscape receptors rather than to each study area is required. However, this can be provided at a future deadline if it would be of assistance to the ExA.
LV1.7	The Applicant	**Landscape Character – Local 1km Study Area** The applicant is asked to confirm whether the assessment of landscape character effects within the local 1km study area included the land within the boundary of Lime Down A to E? and: 1) If so, the applicant is asked to justify the reduction in the significance of effect at year 15 of operation given the scale of land-use change within the boundary of Lime Down A to E?	The Applicant confirms that the assessment of landscape character effects within the local 1km study area (and indeed all the study areas) includes the land within the boundary of Lime Down A to E. In response to Question 1, the reduction in the significance of landscape effects at year 15 of operation is as a result of the maturing mitigation measures within the Sites which will, as it matures, strengthen the level of vegetation and assimilate the development into the landscape.

ExQ	Respondent	Question	Applicant's Response
		2) If not, the applicant is asked to explain why the landscape character effects within the boundary of Lime Down A to E have not been assessed?	The scale of land-use change within the boundary of Lime Down Sites A to E is recognised in the assessment within the local 1km Study Area and concludes there are Moderate Adverse (Significant) effects to Landscape Character as a result of the Lime Down Scheme during construct and Year 1 reducing to Moderate Minor Adverse at Year 15 when proposed mitigation has matured.
LV1.8	The Applicant	**Landscape Character – Setting of Norton Village** SLD states in its WR [REP1-167] that a person in Norton leaving by any of the principal routes out of that village would always come into contact with the proposed development and would experience a surrounding effect. Wiltshire Council states in its WR [REP1-138] that it considers the proposed development has not been adequately assessed against the landscape setting of Norton. Given the way in which the applicant has concluded on effects to landscape character relative to the different study areas, it is not clear to the ExA that the setting of individual villages such as Norton have been properly assessed.	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) [APP189]**. As no significant effects were recorded due to the distance to infrastructure from the receptors and the fact that the village is nestled within a valley, Norton was not carried through to the further ES Assessment) 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

ExQ	Respondent	Question	Applicant's Response
		The applicant is asked to demonstrate how it has considered the landscape setting of Norton in its assessment, including: 1) How the landscape character on the approach to and from the village contributes to its setting; and 2) How the adverse effects on the surrounding landscape adversely effect the character of the village itself.	Landscape surrounding Norton (within the 1km Study Area) during construction as a result of the Scheme and the change from agricultural land to a solar infrastructure. **Response to Question 1** Due to the location of the village within a valley and the rising topography in all directions, its immediate setting is constrained. Existing vegetation on edge of the village provides further containment. The wider setting of the village is only perceived on the minor roads leading to and from the village on higher ground. **Response to Question 2** The adverse effects of the Scheme within the surrounding landscape of the village will have no direct effects on the village itself. Due to the location of the village within a valley and the rising topography in all directions there is very limited visibility of the Scheme. Once on higher ground on any of the minor roads leading to and from the village the visual assessment acknowledges that there are some Significant adverse effects to visual amenity. Refer to

ExQ	Respondent	Question	Applicant's Response
			Assessments for Receptors TR057, TR060, TR061 and TR202 which are summarised in **[APP-192]**.
LV1.9	The Applicant Wiltshire Council Cotswolds National Landscape Board Stop Lime Down	**Cotswold National Landscape – Setting** The parties are asked to define in spatial terms the extent of the area outside of the boundary of the Cotswolds National Landscape (CNL) that is considered to form the setting of the CNL.	The CNL Board (In its Position Statement – Development in the setting of the Cotswolds AONB) considers the setting of the Cotswolds AONB to be "*the area within which development and land management proposals, by virtue of their nature, size, scale, siting materials or design can be considered to have an impact, positive or negative, on the landscape, scenic beauty and special qualities of the Cotswolds AONB*". The Statement clarifies references to setting from the Cotswolds AONB Management Plan: *"The surroundings of the Cotswolds AONB are also important to its landscape character and quality. There are views out of the AONB and across back into land within the AONB and views towards or into it from surrounding areas, all of which can be very significant. Development proposals that affect views into and out of the AONB need to be carefully assessed to ensure that they conserve and*

ExQ	Respondent	Question	Applicant's Response
			enhance the natural beauty and landscape character of the AONB". In consideration of the above and with reference **Volume 3, Appendix 8.6: Assessment of Effects on the Cotswolds National Landscape and its Special Qualities Appendix 8-6 [APP-197]** the applicant has prepared a plan showing the Spatial Extent of Setting of the CNL which is attached.
LV1.10	The Applicant	**Cotswold National Landscape - Furthering the Purpose of the CNL** In the Assessment of Effects on the Cotswolds National Landscape and its Special Qualities [APP-197], the applicant concludes that the proposed development would further the purposes of the CNL as a result of beneficial landscape effects within the setting of the CNL including: • The creation of wildflower meadows within fields A1, C1, C6, C8, C9 and B12. • The creation of wildflower meadow verges in A11, A12 and C10.	Due to the Scheme's location on the edge of the CNL avoidance measures have been incorporated into the Scheme Design as part of the Mitigation Hierarchy as set out in Section 8.9 of the LVIA. This includes: • Avoiding development adjacent to the National Landscape where it would affect its setting; and • Avoiding development where it would be visually intrusive and affect the character and visual experience of the landscape. There were 3 options relating to the how to manage these land parcels. These include:

ExQ	Respondent	Question	Applicant's Response
		• Maintaining hedgerows at their current height of c1.5m bordering the CNL within Site C. On the other hand, in its RR, the Cotswold National Landscape Board (CNLB) [RR-0944] states that the proposed development would fail to further the purpose of the CNL designation in respect of the statutory duty outlined at section 85 of the Countryside and Rights of Way Act 2000. It is not clear to the ExA whether wildflower meadows and meadow verges would be visible to visual receptors within the CNL It is also not clear to the ExA how maintaining the current height of existing hedgerows can be considered to be a positive enhancement to the landscape. 1) Can these measures really be considered to be positive enhancements that further the purpose of the CNL? If so, provide further justification to support this position. 2) Provide further evidence to demonstrate that all reasonable steps have been taken to ensure that the proposed development would further the purpose	• Option 1 - to remove the entire field from the Scheme; • Option 2 - to maintain hedgerows within the red line boundary and remove the field; or • Option 3 - to retain the whole parcel within the Scheme allowing the opportunity to include positive enhancement measures. Discussion with the CNL on these options took place as part of the Consultation process on 24th April 2025 are noted in Table 2: Summary of Engagement Undertaken in **Volume 3, Appendix 8.6: Assessment of Effects on the Cotswolds National Landscape and its Special Qualities Appendix 8-6 [APP-197]**. Following this consultation, information was received from CNL on positive enhancement measures from CNL's Nature Recovery Lead including the provision of wildflower meadows and scrub. Following this and further consultation the Scheme was revised as part of the iterative design process. The following changes were made; • No infrastructure within parcels on the edge of the CNL boundary in the northern part of

ExQ	Respondent	Question	Applicant's Response
		of the CNL or provide evidence to demonstrate that this is not feasible.	A1, A11 and A12, B12, C1, C6, C8, part of C9 and the majority of C10. • Parcels C1, C6, C8, C9 and C10 have remained within the Scheme and provide opportunities for positive enhancement measures. • Parcels C2, C3 and C4 which are not on the edge of the CNL but were considered to be within the setting of the CNL, were removed from the Order Limits. **Response to Question 1** Proposals set out within the LEMP in the northern part of A1, A11 and A12, B12, C1, C6, C8, part of C9 and the majority of C10. The proposals within C1, C6, C8, C9 and C10 do not include mitigation measures to reduce the effects of the Scheme in adjacent parcels. They are distinct enhancement measures which further the purposes of the CNL. These areas within the setting of the CNL have been specifically targeted for positive enhancement to further the purposes of the CNL. As all existing hedgerows within the Scheme are proposed to be strengthened and allowed

ExQ	Respondent	Question	Applicant's Response
			to grow out to provide landscape and visual mitigation, it was recognised that a different management regime for hedgerows on the edge of the CNL was required to conserve its character and open views. As mitigation of adverse effects is not required on the edge of the CNL due to the offset to infrastructure, maintaining hedgerows at their current height of c1.5m bordering the CNL within Site C was proposed. It is agreed that this should not be considered to be a positive enhancement measure but rather a specific management objective to maintain open views of the landscape from the CNL. It was important to distinguish this from the proposal to strengthen and allow hedgerows to grow out to 4.5m across the rest of the Scheme where mitigation of adverse effects are required. **Response to Question 2** The creation of wildflower meadows and margins as well as areas of scrub and new hedgerows as set out within the LEMP are proposed in the northern part of A1, A11 and A12, B12, C1, C6, C8, part of C9 and the majority of C10. These features would be

ExQ	Respondent	Question	Applicant's Response
			visible in Site C where hedgerows are to be managed at their current height of c1.5m. These measures are distinct enhancement measures which have been informed by consultation with the CNL, the CNL Management Plan and Nature Recovery Strategy and are considered to beneficial landscape improvements which further the purposes of the CNL designation. As noted above, these parcels of land could have been removed from the Red Line Boundary but have been retained within the Scheme to provide positive enhancement. This provides a mechanism for the land to be managed to bring about positive outcomes which will demonstrably add value to the host landscape within the setting of the CNL.
LV1.11	The Applicant Cotswolds National Landscape Board	**Cotswolds National Landscape – Potential Main Issues for Examination** In its RR, the CNLB [RR-0944] refers to 8 Potential Main Issues for Examination (PMIE) agreed with the applicant (also set out by the applicant in [APP-289]). The CNLB state that PMIEs 2, 3 and 5 have been resolved.	**Response to Question 1** The Applicant awaits further clarification from the CNL regarding the removal of the southern part of Field A1 following the CNL review of the submitted LVIA and the updated photomontages for Viewpoint 6 in **ES Volume 2 Figure 8-14 Baseline Photography and Photomontages - Viewpoint 1 22 (Part 1)**

ExQ	Respondent	Question	Applicant's Response
		1) With Regards to PMIE 3, the applicant and the CNLB are asked to clarify how its recommendation that consideration should also be given to removing the southern part of Field A1 was dealt with and whether the CNLB still consider that panels should be removed in this location? 2) The RR from the CNLB refers to the production of a series of sections to illustrate the degree of potential visibility of Solar PV Panels in Field C7 from publicly accessible viewpoints within the CNL. The applicant is asked to submit these sections into the examination or identify where they are already provided.	**(Rev 3) [REP2-010]** which were submitted at Deadline 1. **Response to Question 2** The Sections were prepared by the Applicant as part of the pre application Consultation with the CNL Board and Wiltshire Council in March/April 2025. The sections and commentary on the effect of the Scheme between the Applicant, Wiltshire Council and the CNL are submitted at Deadline 3 attached to this document.
LV1.12	Cotswolds National Landscape Board	**Cotswold National Landscape – Special Qualities** In its RR, the CNLB states [RR-0944] that it considers it likely that construction traffic would have a significant adverse impact upon the tranquillity of the National Landscape (one of its special qualities). Other than disagreeing with the applicant's assessment of the impact on the special quality of tranquillity, do the CNLB agree with the applicant's conclusions	Question not directed at the Applicant.

ExQ	Respondent	Question	Applicant's Response
		on the assessment of effects on the CNL's other special qualities as summarised in table 18 of the applicant's ES Appendix 8-6 [APP-197]?	
LV1.13	The Applicant	**Visual Impact – Public Rights of Way** SLD raises concern in its Landscape and Visual Impact Report [REP1-170] that only one of the photomontages illustrates the changes in views that would be experienced by people travelling along PRoWs crossing sites A – E, and no solar PV panels or infrastructure are proposed in the field through which the footpath runs. The ExA note that there are fields where the existing PRoW passes through the middle of the field and there would be solar PV panels proposed either side of the PRoW, including fields A7, C21, C18 and D11. There are also fields where existing PRoW run adjacent to the field boundary next to areas of solar PV panels with no visual screening. The applicant is asked to provide the following: 1) A representative photomontage and a typical section showing the view from a PRoW crossing a field with Solar PV panels either side (for example field D11).	In accordance with GLVIA3 (paragraph 6.19, Ref 29) *'representative viewpoints, have been selected to represent the experience of different types of visual receptor, where larger numbers of viewpoints cannot all be included individually and where the significant effects are unlikely to differ – for example, certain points may be chosen to represent the views of users of particular public footpaths and bridleways*. Photography and visualisations are a tool to support the visual assessment and are not required to undertake an assessment. In all instances where footpaths pass through the middle of the field and there would be solar PV panels proposed either side of the PRoW, including fields A7, C21, C18 and D11 Significant Adverse effects were identified. It is considered that the submitted photography in **[REP1-033], [REP1-034]** and **[REP1-035]** is representative of the visibility of the Scheme and the photography provided from the agreed

ExQ	Respondent	Question	Applicant's Response
		2) A representative photomontage and a typical section showing the view from a PRoW following the boundary of a field with Solar PV panels to one side (for example field D3).	viewpoints is suitable to assist the reviewer's and decision maker's understanding of both the landscape and visual context and effects of the Scheme. **Response to Question 1** The Applicant will prepare photomontages and a typical section from Footpath WT|HULL|5 (Receptor TP131) through field D11 at a future deadline. **Response to Question 2** The Applicant will prepare photomontages and a typical section from Footpath WT|HULL|1 (Receptor TP121) through field D3 at a future Deadline.
LV1.14	Wiltshire Council Cotswolds National Landscape Board	**Visual Impact – Photomontages** Wiltshire Council and the CNLB are asked to confirm if they are satisfied with the viewpoint and photomontage locations? If not, provide reasoning and a marked-up plan showing any additional viewpoint or photomontages that are considered necessary to assess the impact of the proposed development on landscape and visual receptors.	Question not directed at the Applicant.
LV1.15	The Applicant	**Visual Impact – Viewing Angle**	The Visual Impact Assessment assesses the panels at a height of 4.5m facing East which

ExQ	Respondent	Question	Applicant's Response
		Does the assessment of visual impact in the ES [APP-060] account for the angle at which receptors would be viewing the panels (e.g. face on, side on or the underside of the panels) and how has this been taken into account in the selection of whether to use fixed south facing panels or single access tracker panels?	represents the worst-case scenario. It is recognised this is a snapshot in time. Within the **LVIA [APP-060]** the assessment of visual effects has been undertaken to align with the 'worse case' principles of the Rochdale Envelope and as such has been undertaken with consideration of the panels positioned at 'full tilt' at a height of 4.5m Above Ground Level (AGL) as at this point, they are at their most vertical position and therefore considered to have their greatest visual impact. However, it is worth nothing that this position only occurs at the extremities of the daylight hours, as tracker panels would only be in this position first thing in the morning as the sun breaks the eastern horizon and at the end of the day as the sun sets on the western horizon. For the remainder of the day the panels would be 'tracking' the course of the sun and 'laid' back at a lower height with the panels rotating around the 2.5m AGL axis. As such, the panels would gently transition between being 4.5m AGL to 2.5 AGL and then back to 4.5m AGL.

ExQ	Respondent	Question	Applicant's Response
			To support the LVIA, visualisations have been produced to demonstrate a worst-case representation of the position of the panels with the panels positioned at full tilt facing east. The panels are shown consistently in this position regardless of the juxtaposition of the viewpoint to the array to allow continuity of representation.
LV1.16	The Applicant	**Visual Impact – Lighting** The ES [APP-060] states that lighting is not required within the solar arrays for the operational phase. It also states that motion sensing security lighting would be provided within substations and within the BESS area. The applicant is asked: 1) Whether operational maintenance might need to be undertaken within the solar arrays at night? If so, how would any visual impact of lighting be managed? 2) To submit an outline lighting strategy covering the construction and operational phases. 3) To update the design principles and parameters document to be clear on where there would be no lighting installations. Or else explain how the	**Question 1** Night time lighting will be required for some maintenance activities for the Solar PV Sites. As stated within paragraph 2.7.2 of the **Outline OEMP [REP2-022]**, all routine maintenance activities, except panel cleaning, would be scheduled for daylight hours as far as practicable. Therefore, it is anticipated that focussed task specific lighting would only be required in the event of emergency works/ equipment failure requiring night-time working or panel cleaning operations. Paragraph 2.7.1 of the **Outline OEMP [REP2-022]** notes that this level of lighting is similar to lighting required for night-time agricultural activities carried out in the area. Section 3.4 of the **Outline OEMP [REP2-022]** and paragraph 8.7.62 of **ES Volume 1,**

ExQ	Respondent	Question	Applicant's Response
		ExA can be satisfied that no lighting installations would be installed within the solar arrays. 4) Whether details of lighting should be added to the list of details to be approved by the LPA under requirement 5 of the dDCO [REP1-007]?	**Chapter 8 Landscape and Visual [APP-060]** confirms that permanent lighting is not required within the Solar PV Arrays for the operational phase of the Scheme. **Question 2** Before submitting an outline lighting strategy, the Applicant requests clarification from the ExA as to what it envisages this strategy capturing that is not already secured through the relevant management plans. Construction lighting is controlled by section 2.6 of the **Outline CEMP [REP2-019]**. Operational lighting is controlled by section 2.7 of the **Outline OEMP [REP2-022]**. **Question 3** As lighting is controlled by the Outline OEMP, rather than the Design Principles and Parameters, the Applicant has updated the Outline OEMP to explicitly state that no fixed lighting installations would be installed in the Solar PV Sites. **Question 4** As set out in the Applicant's response to DCO1.37, it does not consider lighting should be added to Requirement 5 on the basis that it is already controlled by Requirements 13 and 14 respectively. As Wiltshire Council is the

ExQ	Respondent	Question	Applicant's Response
			discharging authority for both the detailed CEMP and detailed OEMP, it will have control and oversight over lighting details for the construction and operational phases.
LV1.17	The Applicant	**Visual Impact – Security Measures** Work No. 6(b) in the dDCO [REP1-007] includes *'works for the provision of security and monitoring measures including CCTV columns, lighting columns and lighting, cameras, weather stations, communication infrastructure, and perimeter fencing'*. Work No. 6 appears on the Works Plans [REP1-005] to cover all the solar PV, BESS and substation areas. The applicant is asked to provide details of where CCTV columns, lighting columns and lighting, cameras, weather stations and communication infrastructure would be located and to explain how the visual impact of these components has been taken into account?	The CCTV and lighting posts are usually placed at main access locations into the Solar PV Sites. That being said, the exact locations will all be determined at the detailed design stage along with the weather station/SCADA locations. In terms of visual impact, these elements of the Scheme are lower than the 4.5m Solar infrastructure and there will be no greater impact than that identified for the solar infrastructure itself. Permanent lighting is not required within the Solar Arrays for the operational phase but is expected to be needed for some maintenance activities as set out within the Outline OEMP (see response to LV1.16 above). Motion sensing security lighting will be provided within substations and within the BESS to be used only for maintenance and security purposes.

ExQ	Respondent	Question	Applicant's Response
			Temporary site lighting during construction will be required to enable safe working during construction and decommissioning during hours of darkness and will be designed as far as reasonably practicable to minimise potential for light spillage outside the Scheme and Cable Corridor, particularly towards houses, traffic and ecological habitats. Standard good practice measures would be employed to minimise light spill, including glare during construction, operation and decommissioning. The only part of the Scheme within the CNL relates to temporary construction routes which would not require lighting. However, it can be confirmed that any lighting within the setting of the CNL would be compliant with the requirements within Guidance Note 01/21 on 'The Reduction of Obtrusive Light', published by the Institution of Lighting Professionals (ILP) (which forms Appendix 2 of the CML Board's Position Statement on Dark Skies and Artificial Light, Ref 37).

ExQ	Respondent	Question	Applicant's Response
LV1.18	The Applicant	**Visual Impact - Identifying Residential Receptors for the Cable Route Corridor** On the Unaccompanied Site Inspection 2 (USI2) [EV4-002], the ExA noted that there appeared to be some residential receptors in close proximity to the CRC works that have not been identified as individual receptors. For example, at the following approximate grid references on the private receptor plans [APP-100]: • 387300, 174800 (Ivy House and Kendon, Lanhill) • 389100, 170000 (The Roebuck, Thingley) • 388400, 168000 (Residential dwelling west of the B3353 on the private road to Boyd's Farm) • 388750, 166600 (Whitley House, Whitley) The ExA identified that these receptors appeared to be both sperate to the nearest settlement or group of residential receptors and/ or could potentially be more sensitive to change as a result of the proposed development relative to the nearest settlement or group of residential receptors. For example,	It should be noted that LVIA relates to public amenity (as clarified by the Landscape Institute within 'Technical Guidance Note LITGN-2024-01' (Ref 38) under Issue / Question 6(4)) and that whilst an LVIA should consider views from local communities it should focus on "*the way that a community currently experiences views from public locations such as streets and open spaces and how those will change*" recognising at Issue / Question 6(1) that "*Views from houses and individual properties are a matter of private amenity, noting that it is an established planning principle that there is no right to a view. However, it may be helpful for an LVIA to comment on changes to views that will be experienced from groups of properties, or in some cases individual properties, if these changes are likely to be significant*." And that "*Where required, a residential visual amenity assessment (RVAA) should consider effects on private amenity for people in their homes and gardens*". Given the expectation and scrutiny associated with this project, the Applicant has undertaken an assessment of visual impacts upon residential properties. The Applicant utilises a

ExQ	Respondent	Question	Applicant's Response
		the ExA would expect that the adverse effects of the residential dwelling just west of the B3353 on the private road to Boyd's Farm would be more similar to RI136 and RI137 (moderate adverse, significant) than for RS020 (minor adverse, not significant). The applicant is asked: 1) To explain why these receptors were not identified as individual receptors? 2) If they were treated as distinct receptors, whether the assessment of adverse effects would be greater for these receptors than that of the nearest group or settlement? Include reasoning to support conclusions.	Geographic Information System (GIS), to identify and sort all of the visual receptors identified within the LVIA. As part of this process, all visual receptors are reviewed and sorted, with regard to residential properties receptors are sorted into three categories, Settlements, Groups and Individual. In response to the questions raised by the ExA, The Applicant confirms below how the above receptors identified by the ExA were assessed in the LVIA, i.e.: whether as part of a group or as an individual receptor. **Ivy House** is assessed as receptor RG090- Ivy House and neighbouring properties. It is noted that Receptor RG090 has not been indicated on the plan in **[APP-100]** and this has been updated as REV 2. The Receptor has been fully assessed separately to the nearby group RG079 (Fir Tree Farm/ Sparrow Farm) in **Volume 3, Appendix 8-3-4 Landscape and Visual Assessment Sheets - Cable Route Corridor [APP-193**]. The assessment on Receptor RG090 concluded there would be Moderate / Minor Adverse effects on visual amenity on Ivy House and neighbouring properties. The assessment of effects (including the sensitivity and Magnitude of

ExQ	Respondent	Question	Applicant's Response
			Change) is the same and as such assessing them separately would have resulted in the same assessment of effects. **The Roebuck**, a former Public House was assessed as part of RS020- the village of Easton Grey, which is a designated Conservation Area (CA). Although the Roebuck is not within the CA itself, it is a Grade II Listed Building and is prominent on the approach to the village at the junction of Lacock Road. The receptor group was assessed as having a High Sensitivity to change due to this. The Magnitude of Change was assessed as Low, giving Moderate (Significant) Visual Effects recognising that there is some intervisibility with the Cable Route Corridor as a result of the short-term temporary underground cabling. If assessed as a separate receptor the resulting assessment would note that a temporary construction compound is located to the property's south but as this is separated from the property by the railway line and a road, no greater effects would be experienced than those identified for the wider Receptor RS020.

ExQ	Respondent	Question	Applicant's Response
			Boyds Farm Cottages (Receptors RI136: Parkview, Boyds Farm, and RI137: Drumcovitt, Boyds Farm, Gastard) were assessed separately to the nearby group RS020 due to their nearer distance to the Cable Route corridor and their open views to the north and filtered views to the south. The residential dwelling immediately to the west of the B3353 on the private road to Boyd's Farm is well screened by existing vegetation to its north and west which would restrict views to the cabling works in both directions. The level of change for Receptor RS020 was assessed as Very Low as construction activities would be predominantly screened by intervening vegetation with only glimpsed views. In noting that the topography falls away from the property to the south which would restrict views, it is unlikely that an individual assessment of this property would have come to a different conclusion. **Whitley House** was assessed as part of Receptor RS021 which was assessed as being of Medium Sensitivity. The assessment notes that construction activities to the east (including a construction compound in relative proximity) would be visible from some

ExQ	Respondent	Question	Applicant's Response
			properties on the northeastern and eastern edges of the village depending on the level of intervening vegetation and the level of change would be Low and temporary due to the nature of the works. If Whitley House had been assessed as an individual receptor it's Grade II listed House and Barn would have resulted in a High Sensitivity to change. However, as the outlook from Whitley House is enclosed by mature trees and vegetation which predominantly screen views towards the Cable Route Corridor, the magnitude of change in views of the short-term temporary construction activities relating only to underground cabling (as there is no visual relation with the construction compound to the east due to intervening woodland) would be Very Low. This would result in Moderate / Minor Adverse effects and therefore consistent with those identified for the wider Receptor RS021.
LV1.19	Wiltshire Council Stop Lime Down	**Visual Impact - Residential Visual Amenity Assessment** SLD explains in its Landscape and Visual Impact Report [REP1-170] that it disagrees with the applicant's approach that a residential visual amenity assessment (RVAA) is not required and states that the level of effect that	The Applicant notes direction of the question to Wiltshire Council and Stop Lime Down. The Grain Store Barn, Farleaze (RG020) is a group of 4 dwellings within a single converted agricultural barn located immediately to the west of Pig Lane. The central two dwellings are both two storeys, and the two dwellings on

ExQ	Respondent	Question	Applicant's Response
		would be experienced by receptors at Grain Store Barn does cross the threshold for 'full' RVAA. SLD also states that may also be the case for other residential receptors. Wiltshire Council: 1) Do Wiltshire Council agree with the applicant's approach that a RVAA is not required? If it does not, provide reasoning and identify the residential receptors that you consider should be scoped into a RVAA and why? Stop Lime Down: 2) SLD are asked to identify any other receptors they consider should be subject to a full RVAA.	the flanks of the barn are both single storeys. The main aspect of the properties faces approximately east-west. The barn is set within a large curtilage comprising hardstanding to the front of the properties and individual private gardens to the rear of the property that extend for approximately 14m from the rear elevation of the barn. Beyond the gardens, each dwelling then has a larger area of paddock that extends for approximately 72m from the domestic gardens. To the rear of the properties (approximately west) is Lime Down field C15. The Order Limits are not directly contiguous with the field boundary and the rear boundary of the paddocks, which extends approximately 85m from the rear of the properties and as such the Order Limits are located approximately 101m from the rear elevation of the barn. A run of telegraph poles crosses the field and marks the proposed extent of the panels – all panels, fenceline would be offset west of the telegraph poles within field C15, with panels being located approximately 214m from the rear

ExQ	Respondent	Question	Applicant's Response
			elevation of the properties. The Scheme includes for a Proposed Native Hedgerow with Trees to be planted along the Order Limit boundary, with Low Density Scrub beyond. To the north of the barn and west of Pig Lane are fields C15 (no panels are proposed in this area) and field C14. The area of field C15 has been planted with a young woodland, which the Scheme intends to retain. An existing hedgerow separates fields C15 and C14, which would be reinforced (gapped up with native hedgerow) and grown up to a height of 4.5m. Panels within C14 would be located at approximately 165m north of the dwellings. To the east, no panels are proposed within field C16, with the nearest proposed panels within C17 being located approximately 160m from the barn on the far side of the existing field boundary hedgerow between fields C16 and C17. The landscape proposals along this boundary are to reinforce the existing hedgerow as well as providing Linear Tree Planting along the eastern side of the hedgerow.

ExQ	Respondent	Question	Applicant's Response
			Existing hedgerows are also present along both sides of Pig Lane. To the south east of the barn, and on the eastern side of Pig Lane, panels are proposed within field C18, with the nearest panels being located approximately 150m south east of the barn and set beyond the existing hedgerow along Pig Lane. The field immediately south of the dwellings is not within the Order Limits and therefore no development is proposed within this field. Whilst the Order Limits do extend around this field, they are proposed for works associated with the Cable Route only, maintaining an open aspect south from these dwellings. There is no proposed infrastructure within field C16 and open views are maintained to the south. The LVIA found that there would be Major / Moderate Adverse (Significant) effects on occupants of Grain Store Barn, Farleaze (RG020) during the Construction phase and at Year 1. These effects reduce to Moderate Minor Adverse as a consequence of the

ExQ	Respondent	Question	Applicant's Response
			established landscape mitigation at Year 15, with the mitigation planting help to filter views of the proposed infrastructure and reduce visibility of the Scheme. However, it is recognised that views of the array (mostly likely from upstairs windows) would continue for the life time of the Scheme. Within LVIA, consideration of visual impacts of a proposed development is usually restricted to potential impacts on public visual amenity i.e. publicly accessible locations. However, it is not uncommon for significant adverse effects on views and visual amenity to be experienced by people at their place of residence as a result of introducing a new development into the landscape. It is a commonly understood position that private individuals do not have an automatic right to a view (as established in 1610 by Aldred's Case [1558–1774]) and where a new development significantly changes a view from a private property, this is not normally grounds for a refusal of planning permission, even in

ExQ	Respondent	Question	Applicant's Response
			the case of significant impacts to residents' outlook. The exception to this approach is when a visual impact on a private property is so severe that it may affect the residential amenity of a dwelling. Residential Visual Amenity Assessment (RVAA) is the process by which the potential visual impact of a development on the residential amenity of a private property can be objectively assessed. The Landscape Institute TGN 02/2019 Residential Visual Amenity Assessment (Ref 39) sets out the approach to assessing the potential impact of a development upon Residential Visual Amenity and is based on the principles and process established in GLVIA3 and draws on principles established in Planning Appeals by planning inspectors (Ref 29). Factors that contribute to this judgement include whether a development is: Overwhelming in views in all directions. Inescapably dominant. Unpleasantly encroaching.

ExQ	Respondent	Question	Applicant's Response
			A key consideration was the Burnthouse Farm windfarm inquiry (Burnthouse Farm Windfarm, SoS Decision (APP/D0515/A/10/2123739) 6th July 2011) in which the Inspector stated: *"No individual has the right to a particular view but there comes a point when, by virtue of the proximity, size and scale of a given development, a residential property would be rendered so unattractive a place to live that planning permission should be refused. The test of what would be unacceptably unattractive should be an objective test."* At paragraph 120 of the Burnthouse Farm report the Inspector comments further on the threshold for determining unacceptable effects on visual amenity: *"There needs to be a degree of harm over and above an identified substantial adverse effect to take a case into the category of refusal in the public interest. Changing the outlook from a property is not sufficient."* The LVIA has considered the Visual Amenity of nearby residential properties. This being the overall quality, experience and nature of views

ExQ	Respondent	Question	Applicant's Response
			and outlook available to occupants of residential dwellings, including views from gardens and domestic curtilage. In the case of Grain Store Barn, Farleaze (RG020), given the juxtaposition and distance between the array, the open aspects retained to the south, and the dwellings and their immediate curtilage (and wider paddocks), together with the proposed mitigation planting, the findings of the LVIA are considered robust and as such, whilst views of the array are acknowledged, these would not trigger the requirement for a RVAA.
LV1.20	The Applicant	Visual Impact – Sequential Views The applicant's assessment of sequential effects in the ES [APP-060] only identified recreational walking routes for assessment. The applicant is asked: 1) To provide an assessment of the sequential effects on the Wiltshire Cycleway. 2) To comment on whether cyclists may be differently susceptible to sequential visual effects due to the speed and therefore reduced time between views	**Response to Question 1** The Applicant will undertake an assessment of Sequential Visual Effects on the Wiltshire Cycleway within the 10km Study Area for Deadline 4. The applicant wishes to express that having undertaken an assessment of sequential effects on the Fosse Way and the A429 and the A350 routes as requested by Wiltshire Council and provided at Deadline 1 as **Technical Note on** Cumulative Sequential

ExQ	Respondent	Question	Applicant's Response
		of different parts of the proposed development. 3) Whether the applicant has identified the commonly used routes for horse riders and considered the sequential visual effects on these routes taking into account the more elevated position of a person on horseback?	Visual **Effects [REP1-123]**, it is their professional opinion that an assessment on the Wiltshire Cycleway is likely to conclude similar effects for the reasons set out below. There are two Cumulative Development Sites which would be included in the assessment of Sequential Visual Effects on the Wiltshire Cycleway, CD Site 221 at an approximate distance of 0.8km from the cycle way and CD Site 346 at an approximate distance of 0.87km from the cycleway. CD Site 221 is located approximately 3.73km to the south of Lime Down Solar Project Sites and CD Site is approximately 6.25km south of Lime Down Solar Project Sites. Both CD sites are to the south of the M4 motorway. Given these distances and the journey time required to cycle that distance, it is considered that the visual effects on the visual experience / amenity of users of the Wiltshire Cycleway would be no greater than those experienced from the Lime Down Scheme. The presence of the Lime Down Scheme seen sequentially with the CD Sites would not dominate the visual

ExQ	Respondent	Question	Applicant's Response
			experience of users of the cycleway within the 10km Cumulative Study Area. As a result of the Scheme, the LVIA **[APP-060]** (as set out within ES Volume 3, Appendix 8-3-2-2 LVIA Assessment Sheets (Significant) **[APP-191]**) recognises that there would be Moderate Adverse effects on the visual amenity of users of the minor roads and the Fosse Way which make up the Wiltshire cycleway. It is therefore predicted that an assessment of Sequential Visual Effects on the Wiltshire Cycleway within the 10km Study Area would not find any additional Significant Adverse Sequential effects. **Response to Question 2** As cyclists relate to recreation and enjoyment of the landscape (as set out in Paragraph 1.2.9 of the LVIA Methodology in **ES Volume 3 Appendix 8-1 Landscape and Visual Impact Assessment Methodology (Rev 2) (Tracked) [REP1A-007]**), cyclists are considered to have the same susceptibility to sequential visual effects as other recreational users. As set out

ExQ	Respondent	Question	Applicant's Response
			in Table 8.1.1.10: Visual Receptor Susceptibility to Change of the LVIA Methodology in **[REP1A-006]** their susceptibility is assessed as High. **Response to Question 3** The Applicant has not identified any commonly used routes for horse riders and no promoted or recognised riding routes within the 10km Cumulative Study Area have been identified or sequential visual effects. The visual effects on individual Bridleways has been fully assessed in the LVIA and considers the more elevated views experienced by horse riders.
LV1.21	The Applicant	**Mitigation – Planting Density** The outline Landscape and Ecological Mitigation Plan (oLEMP) [APP-283] states that gaps in existing hedgerows will be 'gapped up' (infilled) wherever practicable. Further detail is requested on how it would be determined whether a section of hedgerow would need to be infilled, would it just be where there is a complete break in hedgerows or would existing sparse/thin hedgerows also be enhanced to provide a higher density of hedgerow?	Strengthening of all existing hedgerows is proposed to increase the species diversity, secure the longevity and to ensure that desired hedgerow heights for visual mitigation purposes can be achieved. Across the Sites this will include the following activities: • Replanting of existing gaps where sections of hedgerows have died or have been removed; • Selective clearance or coppicing of sections dominant in non-woody shrubs

ExQ	Respondent	Question	Applicant's Response
			such as Dog Rose and Bramble or over-mature sections where the lower half is void of any leafy growth; and • Supplementary planting of hedgerows with a poor species count or dominated by a single species such as Hawthorn. These three methods are detailed below: **Gapping Up** Several hedgerows across the Scheme are fragmented, containing a number of gaps that lead to increased intervisibility between the fields and reduces the connectivity of the Sites green infrastructure. The gapping up of hedgerows is a key part of the hedgerows enhancements and will aid the creation of a complete linear feature. To ensure the gap can be successfully closed, the adjacent hedgerows should be faced up on each side to create a clearance suitable for planting, with the gap created replanted using a mixed, native species hedgerow mix. **Selective Clearance / Coppicing** Lengths of hedgerows across the Scheme contain sections dominant in non-woody shrub

ExQ	Respondent	Question	Applicant's Response
			species such as Dog Rose and Bramble or over mature sections where the lower half is void of any leafy growth. These sections lack rigid structure required to create consistent visual screening. Areas containing Bramble will be cut back or flailed to ground level with the roots grubbed out to prevent regrowth. Care must be taken during grubbing out to ensure damage to the roots of the adjacent hedgerows is limited. It is recommended that sections containing Dog Rose or over mature shrubs be coppiced to above ground level to allow the plants to re-grow throughout the new hedgerow. The created gap will be replanted using a mixed, native species hedgerow mix. All clearance and coppice should be undertaken outside of the bird nesting season (1st March – 31st August) and ideally in January / February to avoid disturbance to nesting birds. If works are required during bird nesting season advice from a suitably qualified ecologist should be sought prior to undertaking any works. **Supplementary planting**

ExQ	Respondent	Question	Applicant's Response
			Several lengths of hedgerows across the Scheme are species poor, containing a limited species diversity and low ecological value. To increase the diversity of these hedgerows, a supplementary row will be planted alongside the existing. To ensure the successful integration of the supplementary row, the existing hedge will be faced up hard on the side in which the new row will be planted. A single row of hedgerow plants will be planted up against the existing using a mixed, native species hedgerow mix. All pruning should be undertaken outside of the bird nesting season (1st March – 31st August) and ideally in January / February to avoid disturbance to nesting birds. If pruning is required during bird nesting season advice from a suitably qualified ecologist should be sought prior to undertaking any works. The above would be secured within the **Outline Landscape and Ecological Management Plan [APP-283]** (the 'Outline LEMP') by Requirement 7 of Schedule 2 of **Draft DCO [REP1-007]**.

ExQ	Respondent	Question	Applicant's Response
LV1.22	The Applicant	**Mitigation – Planting Performance Criteria** Further information is requested on the performance criteria for the successful establishment of planting for visual screening. The ExA note that the oLEMP [APP-283] states that the shrubby element of hedgerows will be maintained to an optimum height of 4.5m tall but the applicant is asked to explain how the density of planting would be monitored and managed to ensure that visual screening is achieved? For example, a 4.5m tall hedgerow which is very sparse might provide very little screening.	Following initial strengthening work to existing hedgerows as described in the response to LV1.21above continued management to hedgerows would include less regular mechanical cutting, for example, every two-three years, and on rotation (either by rotating hedgerows or cutting each side of the hedgerow on rotation) as set out in Para 1.3.32 of the **Outline LEMP [APP-283].**
LV1.23	The Applicant Wiltshire Council Stop Lime Down	**Cumulative and Combined Effects - Cumulative Sequential Visual Effects** Both Wiltshire Council [REP1-137] and SLD [REP1-170] raise concern that the applicant's assessment of cumulative landscape and visual effects does not consider sequential visual effects. Wiltshire Council identified [REP1-137] routes that the sequential assessment should include and the applicant provided a Technical Note on Cumulative Sequential Visual Effects [REP1-123]. The Applicant:	**Response to Question 1** The Applicant will undertake an assessment of Sequential Visual Effects on the Wiltshire Cycle Way within the 10km Study Area for Deadline 4. Please see response to LV1.20 above.

ExQ	Respondent	Question	Applicant's Response
		1) The applicant is asked to provide an assessment of the sequential visual effects from cumulative developments on users of the Wiltshire Cycleway within the 10km study area. <u>Wiltshire Council:</u> 2) Wiltshire Council is asked to confirm if it agrees with the applicant's methodology and conclusions in its Technical Note on Cumulative Sequential Visual Effects [REP1-123] that there would not be any additional significant adverse sequential visual effects on users of the Fosse Way or A429/A350. <u>Stop Lime Down:</u> 3) SLD is asked to identify any other routes that it considers should be included in an assessment of sequential visual effects.	
LV1.24	The Applicant Wiltshire Council Stop Lime Down	**Cumulative and Combined Effects – Cumulative Effects on Landscape Character** The ES [APP-060] assesses cumulative effects to landscape character relative to study area distances offset from the boundary of Lime Down sites A to E. The ExA note from	The Applicant considers that the scale at which cumulative landscape character effects should be assessed depends on a number of factors which are specific to a particular project and location. Fundamentally it relates to the scale of the project and the nature of the receiving landscape and its capacity to accommodate

ExQ	Respondent	Question	Applicant's Response
		Figure 8-15-7 of the ES [APP-106] that the percentage of the area of LCA8 (Hullavington Rolling Lowlands) that is currently taken up with solar development is 0.57%. The proposed development and other solar applications would increase that to 5.15% with the proposed development forming the largest share at 3.41%. The ExA seek to understand the different parties views on the scale at which cumulative landscape character effects should be assessed and have the following questions: <u>The Applicant:</u> 1) Can the applicant explain why cumulative effects to landscape character were not defined in relation to the scoped in landscape receptors e.g. LCAs/ LCTs? <u>Wiltshire Council:</u> 2) Can Wiltshire Council and SLD provide their position on the correct scale of area to assess the cumulative effects to landscape character? <u>All Parties:</u> 3) The applicant, Wiltshire Council and SLD are asked whether, and to what extent, they consider that the	change which relates to its aesthetic and perceptual qualities. **Response to Question 1** The Applicant politely requests that the ExA refers to the response provided at **LV1.6 Landscape Character – Assessment Methodology [EN010168/EXAM/9.29]** as the same response applies to the Cumulative Developments assessment as set out in **ES Volume 3, Appendix 8-3-2-2 Landscape and Visual Assessment Sheets (Significant) [APP191]**. **Response to Question 3** The applicant considers that the percentage cumulative land-use change within LCA8 should not be considered a finite indicator of the significance of cumulative adverse effects to the landscape character of the receptor. However, it is an indicator of the degree of landscape change within the Study Area but as stated above this depends on the receiving landscape. By way of example, if the receiving landscape was a large-scale vale with open

ExQ	Respondent	Question	Applicant's Response
		percentage cumulative land-use change within LCA8 should be used as an indicator of the significance of cumulative adverse effect to the landscape character of the receptor?	cross valley views, a low percentage of cumulative developments could have a higher level of perceived change than a more enclosed intimate landscape where a higher percentage of cumulative development would not be perceived leading to a lower magnitude of change.
LV1.25	The Applicant	**Cumulative and Combined Effects - Not Significant Effects** Paragraph 3.34 of the Guidelines for Landscape and Visual Impact Assessment (3rd Edition) states that it should be made clear that effects not considered to be significant will not be completely disregarded. Explain how this has been taken into consideration, including in relation to the assessment of cumulative and combined effects, socio-economic effects and the wider 'planning balance' within the Planning Statement [APP-267].	The LVIA has assessed all identified receptors and has not disregarded those regarded in the assessment as non-significant effects. Although the EIA regulations concentrate on the findings of Significant Effects, **Volume 3, Appendix 8-3-2-1 Visual Assessment Sheets (Non-Significant) [APP-190]** provides the assessments for receptors where non - significant effects were assessed. It is recognised that adverse effects can add up or cumulate, but this has not occurred in this location. This is due to the dispersed nature of the Sites within the Scheme and the character of the Hullavington Lowland host Landscape Character Area including its undulating topography and wooded character. The **Technical Note on Intra Project Cumulative Visual Effects [REP1-22]** identified Intra Project Cumulative Visual Effects for 22

ExQ	Respondent	Question	Applicant's Response
			receptors with only 6 of these experiencing significant Intra Project Cumulative Visual Effects. In all cases, the effect of the secondary site is less than the primary Site. This is predominantly due to the distance to the Sites or the fact that they are seen from a different location from the route (referred to a sequential visibility). As such, this would not increase the level of effects above those described for the primary Site. Therefore, the Intra Project Cumulative Visual Effects are as identified for the primary Site. The assessment concluded that this is due to the "disaggregated / disparate nature of the Lime Down Sites A to E" combined with rolling character of the Hullavington Lowlands. As such, the assessment does not consider there to be a greater Cumulative Visual Effect for these receptors than for the assessment of the level of harm identified from the individual sites themselves. With respect to socio-economic effects, non-significant landscape effects as assessed in **ES Volume 1, Chapter 8: Landscape and Visual [APP-060]** have been considered as part of the assessment of impacts to tourism and recreation receptors, and thus on the tourism and recreation dependent economy in

ExQ	Respondent	Question	Applicant's Response
			ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068] and its supporting **ES Volume 3, Appendix 3: Tourism and Recreation Receptor Tables [APP-241]**. Impacts to the visual experience for PRoW users, and visitors to key attractions have been considered, whether significant or not, as part of the likely change to visitor and user amenity, along with considering change to the visual and auditory character of surroundings, and physical impacts to access to and use of facilities from HGV movements, or the location of physical infrastructure associated with the Scheme. This is used to judge the extent to which visitors may be dissuaded from using PRoWs or visiting attractions or recreational facilities that would have a resultant effect on visitor or user spending, and thus on the tourism-dependent economy. The planning balance exercise involves the consideration of the outcomes of the planning appraisal undertaken in Section 8 of the **Planning Statement [REP2-017]**, applying the hierarchy of weight. The planning appraisal considers matters and topics set out in NPS EN-1 and NPS EN-3 which includes the findings of the various technical chapters

ExQ	Respondent	Question	Applicant's Response
			within the ES and effects assessed as both significant and not-significant. The planning balance exercise categorises the impacts associated with the Scheme as positive, neutral and negative. Neutral impacts have been identified where the ES confirms that there will be no significant effects from the Scheme, demonstrate general compliance with the relevant planning policies and have therefore been considered to have neutral weight in the planning balance. These topics of neutral weight are set out in paragraph 9.4.11 of the **Planning Statement [REP2-017]**.
LV1.26	The Applicant	**Design – Access Points** The applicant is asked to explain how the proposed access points from the public highway would be designed to be appropriate to the receiving landscape character and minimise impacts on landscape and visual receptors? The applicant's response should also include its position on whether there should be tighter controls within the Design Principles and Parameters [REP1A-008] to ensure that the design of access points would be appropriate to the receiving landscape character?	Where long-term maintenance access is necessary from public highways, the planting of a secondary hedge inside the access points, although not ideal from a landscape character point of view, would restrict receptor views of the developed field parcels when passing the access points. 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

ExQ	Respondent	Question	Applicant's Response
			duration of the Scheme) gaps need to be created to facilitate access to particular fields/parts of the Solar PV Sites including providing access for Abnormal Indivisible Loads (AIL), totalling approximately 327 m in length. Sections of hedgerow to be permanently removed for new internal access tracks where no existing gap is present will typically be between 3.5 m to 6 m wide, with a maximum of 10 m of hedgerow to be removed in any one location for this element of the Scheme. Sections of hedgerow to be removed to provide access from the existing highway network, including for Abnormal Indivisible Loads (AIL) will require a maximum of 18 m of hedgerow loss at any one access point, although would typically be less than this at most access points. 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.

ExQ	Respondent	Question	Applicant's Response
			A Hedgerow Removal Plan showing anticipated permanent hedgerow losses is provided at Appendix A of the **Outline Ecological Protection and Mitigation Strategy [REP1-106].** With regard to the Fosse Way (where this issue was noted as a particular concern) there are 7 separate Access points required to provide access into the adjacent areas of LD Sites B and C. Of these only 4 access points provide access into a field with solar PV infrastructure: • Solar Access Point 202 into field B6; • Solar Access Point 3 into field C22; • Solar Access Point 19 into field C12; and • Solar Access Point 1 into field C11. All of the above access points are accessed from the Fosse Way where it is made up of tarmacked Public Highway, with most users therefore traveling by motor vehicles moving at speed. It is recognised that this section of the Fosse Way is used by other forms of road user

ExQ	Respondent	Question	Applicant's Response
			such as pedestrians, cyclists and horse riders etc. On decommissioning the land within the Scheme would be returned to landowners, and it is expected that the equivalent of today's countryside protection laws would be in place protecting the removal of hedgerows and trees associated with the landscape mitigation proposals. As such, at decommissioning, the proposal by WC to provide for a secondary hedgerow behind the existing would be at odds with the existing field pattern and not be in keeping with the landscape character of the area or align with the aims of the Nature Recovery Strategies or published Landscape Character documents. As such, given the small number of propped Access Points that would actually result in views of the array through the gaps (4), the width of the gap (between 3.5 m to 6 m wide), and the distance between the farthest two Access Points (approx. 3.6km), it is considered that the visual impact associated with these transient, glimpsed, oblique views (and

ExQ	Respondent	Question	Applicant's Response
			temporary, all be it long term) through these gaps does not warrant the permanent impact to landscape character associated with the planting of a secondary hedgerow behind the existing.
LV1.27	The Applicant	**Design – Energy Storage Facility and Substations** The applicant is asked to provide further explanation of how the energy storage facility (Work No. 2) and the onsite substations (Work No. 3) would be capable of being laid out and designed (including through use of colour and materials) in order to promote the best possible aesthetic and visual appearance and to minimise landscape and visual effects?	**7.4 Design Principles and Parameters (Rev 2) [REP1A-007]** Work No.2(b) BESS Container Commitment states that they will be externally finished to be in keeping with the prevailing surrounding environment with the exact colour subject to manufacturer specifications and agreed with the relevant planning authority prior to construction. It will be carefully selected in subdued, non-reflective tones to sit as discreetly as possible within the landscape. Work No. 3 commits that the control buildings will be finished in neutral colours in keeping with the prevailing surrounding environment. Onsite substations will also be screened in accordance with the **Outline LEMP (Section 1.3) [APP-283]** and secured by the **Draft DCO [REP1-007].** A 2m high and 3m wide bund is proposed to the BESS.

ExQ	Respondent	Question	Applicant's Response
			Along with a 2m high fence, tree and scrub planting on the bund is proposed to screen the BESS. In addition to this a native woodland block is proposed along the railway line. To further minimise landscape and visual effects, matte, non-reflective RAL colours (typically below a 30% gloss level) would be proposed which would match the specific seasonal and tonal properties of the local environment. These colours would assimilate with the local dominant tones to promote the best possible aesthetic and visual appearance of the infrastructure**.**
LV1.28	The Applicant Stop Lime Down	**Glint and Glare – Stop Lime Down Assessment** SLD provided a Glint and Glare Assessment at D1 [REP1-178]. The applicant is asked to consider the conclusions and recommendations set out in SLD's assessment, and in the forthcoming SoCG between the parties, the applicant and SLD are asked to set out where agreement can be found in relation to the assessment methodology, including but not necessarily limited to: • The model output data.	The Applicant has provided **Glint and Glare Modelling Outputs [EN010168/EXAM/9.37]** in response to SLD's assessment at Deadline 3. The Applicant has responded to SLD's concerns regarding the **Glint and Glare Assessment [APP-261]** in **Applicant's Response to Written Representations [REP2-039]**. The Applicant confirms that the modelling data used to inform assessments has been provided at Deadline 3 in **9.37 Glint and Glare Modelling Outputs (Parts 1 and 2) [EN010168/EXAM/9.37].** Discussions are

ExQ	Respondent	Question	Applicant's Response
		• The assessment of impact on local roads. • Impact significance definition. • How the cumulative footprint of the proposed development is assessed, including in relation to Badminton and Bowldown Farm Airfields. • The assessment of train driver safety.	ongoing regarding direct technical engagement between the Applicant's consultants and Stop Lime Down's consultants. Any developing or agreed positions arising from that engagement will be recorded in the SoCG between the Applicant and Stop Lime Down.
LV1.29	The Applicant	**BESS Firefighting Storage Units** The oBSMP [REP1-110] states that the BESS Area will contain a minimum of two firefighting water storage units of no less than 228,000 litres in capacity. The Applicant is asked to confirm whether the units would be above or below ground, and if above ground, provide indicative details of appearance including dimensions. It should also be confirmed that the Landscape and Visual Impact Assessment takes account of the possibility of above ground tanks.	The Applicant confirms that the water storage units, as shown in **ES Volume 3, Appendix 3-1 Substations and Battery Energy Storage System Description [REP2-015],** retains the flexibility to locate the water storage above or below ground. This will be determined as part of the detailed design and will take into account the latest guidance and any advice from or preference of Dorset and Wiltshire Fire and Rescue Service. Should the water storage be above ground, these are anticipated to up to approximately 4.5 m high with laddering to provide roof access, adding approximately 1 m. The water volume is the key and wider, rather than taller units, could be used given the footprint on the ground is not constrained.

ExQ	Respondent	Question	Applicant's Response
			The water storage units have been considered as part of infrastructure in the Landscape and Visual Impact Assessment. Due to their relative size to the surrounding infrastructure and their location at the rear of the Site there are no additional effects to those assessed for the surrounding infrastructure.

2.14 Land Use, Soils and Food Security

ExQ	Respondent	Question	Applicant's Response
LSF1.1	The Applicant	**Food Security** Wiltshire Council's Local Impact Report (LIR) [REP1-137] details that the loss of 30% BMV agricultural land associated with the site equates to approximately 5,000 tonnes of crops/year. Over a period of 60 years this equates to some 300,000 tonnes during the operation of the proposed development. This does not include construction, decommissioning or other periods where the land is left fallow because of the development. As discussed at Issue Specific Hearing 1, the Department for Environment and Rural Affairs (DEFRA) published a national security report on 20 January 2026, which emphasised the severe vulnerability of Britain's food systems. Specifically, it stated *'Without significant increases in UK food system and supply chain resilience, it is unlikely the UK would be able to maintain food security if ecosystem collapse drives geopolitical competition for food. The UK relies on imports for a proportion of both food and fertiliser and*	With regard to Bullets 1 to 3, the Applicant confirms that a Farming Report will be submitted at Deadline 4 to respond to these points. This report will include the area calculations requested. With regards to cumulative calculations at a county scale, estimates will be provided based on desktop information along with a review of planning applications available on the Wiltshire County Council portal. With regard to Bullet 4, as set out in **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]**, the Applicant adopted a sequential approach to site selection. In the initial stages of site selection, the Applicant identified and assessed potential development areas on grade 4, 5 (non-BMV) and non-agricultural land, as well as brownfield sites within the 20km search area. None of the initial PDAs or brownfield sites were considered suitable for the Scheme due to constraints unrelated to agricultural land classification (such as site size and existing development uses), therefore it was necessary

ExQ	Respondent	Question	Applicant's Response
		cannot currently produce enough food to feed its population based on current diets. Countries best placed to adapt are those that invest in ecosystem protection and restoration, and resilient and efficient food systems.' The applicant's application is dismissive of food security considerations because, as stated in the Planning Statement [REP2-017], the NPSs do not contain specific policy on the topic, and because analysis in the DEFRA Land Use Framework (March 2026) confirms that there is enough land to deliver the government's objectives for nature restoration and development without reducing domestic food production or compromising on these objectives. The ExA questions whether that is a simplistic view of the Land Use Framework, because the document also states that spatial decisions made by one sector will often affect another, meaning strategic spatial planning at landscape scale will be key to growth, food security and nature recovery. On that basis, land use is to be carefully managed. Further, it states that government is clear that food	to reintroduce BMV land into the search criteria. The search was then expanded to include Grade 3 and some Grade 2 agricultural land. The site selection exercise did not distinguish between Grade 3a and Grade 3b agricultural land with the approach driven by the availability and coverage of agricultural land classification data as previously addressed in pages 11 and 12 of the **Written Summary of the Applicant's Oral Submissions and Responses at Issue Specific Hearing 1 and Responses to Action Points [REP1-012]**. The provisional agricultural land mapping from the 1970s provides a broad dataset across the full 20km search area whereas the more detailed 1988 agricultural land classification mapping has a much more limited coverage across the search area (covers 4.39% of the search area). Therefore, the 1970s provisional agricultural land mapping which does not distinguish between Grade 3a, and Grade 3b agricultural land was used in the site selection exercise. The new predictive agricultural land classification map for England was published

ExQ	Respondent	Question	Applicant's Response
		security is national security and that it agreed with respondents who called for the strategic safeguarding of the best farmland from permanent land use changes, and for improving the resilience of agricultural land to the impacts of climate change. The ExA note the applicant's D2 response to the Council [REP2-038] that the loss of 5,000 tonnes of combinable crop from the site only represents a reduction of approximately 0.025% of UK production. However, in light of the very recent national food security alarm, the need for land use to be carefully managed, and the national policy position in NPS EN-3 (Paragraph 2.10.21) which recommends avoidance of the of "Best and Most Versatile" agricultural land where possible, the applicant is asked to provide the following information: • How much of Wiltshire is farmland, and of that farmland how much is classed as being BMV and not BMV? • Cumulatively, how much farmland within Wiltshire would be occupied by solar farms currently benefitting from made DCOs and planning permissions,	in April 2026 and distinguishes between Grade 3a and Grade 3b agricultural land. However, as this data set was not available at the time in which site selection was undertaken, this data could not inform site selection. Notably, **ES Volume 1, Chapter 17: Soils and Agriculture [REP1-025]** sets out that the Scheme will result in a temporary, long-term and reversible loss of agricultural land for the operational life of the Scheme. There are no significant permanent effects on agricultural land, as all land will be returned to its original use and condition as far as practicable following decommissioning, as set out in paragraphs 2.1.3 to 2.1.5 of the **Outline Decommissioning Strategy [REP1-100]** which is secured by Schedule 2, Requirement 20 of the **Draft DCO [REP1-007]**. Given all land will be returned to its original use and condition, construction and operation of, the Scheme therefore does not result in a permanent land use change. **ES Volume 1, Chapter 17 Soils and Agriculture [REP1-025]** confirms that the design of the Solar PV Sites is compatible with

ExQ	Respondent	Question	Applicant's Response
		and of that farmland how much is classed as BMV and not BMV? • When the Lime Down proposal is added to the figures from bullet point 2, how much is classed as BMV and not BMV? • Robust evidence that a full and comprehensive assessment of availability of land at grades 5, 4 and 3b was conducted within the 20km radius of the grid connection before grades 3a, 2 and 1 were considered.	some farming practices, such as sheep grazing, which could provide an opportunity to limit the effects on agricultural production during the Scheme's operation. However, this would be a potential future land management option rather than a guaranteed component of the Scheme. As noted within the **Written Summary of the Oral Submissions at the Open Floor Hearing 1 and the Applicant's Responses [REP1A-013]** (pages 418 and 419), agrivoltaic approaches have not been relied upon within the Scheme design as they can materially reduce generation efficiency compared with the optimised and selected use of bi-facial solar modules for the Scheme. The Applicant is cognisant of growing concern around food security and land use competition and refers to the Secretary of State for Energy Security and Net Zero decision letter for Springwell Solar Farm. The decision advised that impacts on food production should have been included within the ES in order to fully assess the impacts of the loss of the economic and other benefits of best and versatile agricultural land but also acknowledged that

ExQ	Respondent	Question	Applicant's Response
			the impact on food security carried little negative weight against the Order. As noted in response to Bullets 1 to 3 the Applicant proposes to provide information on the impacts of the Scheme on food production in Wiltshire in the Farming Report being produced for Deadline 4.
LSF1.2	The Applicant	**Agricultural Land Performance** Paragraph 17.7.2 of ES Volume Chapter 17 [REP1-025] confirms that the Solar PV Sites measure 717.5 ha. This excludes the areas set aside for mitigation purposes. You are asked to confirm the total area of land being removed from agricultural activities across the entire Order limits for the lifetime of the development. Further to this, you are asked to confirm how this then impacts on immediately adjacent fields and their capacity for agricultural production in terms of maximising their agricultural yield.	The Applicant confirms that approximately 749.3 ha of agricultural land will be removed from primary agricultural activities for the duration of the Scheme. Some agricultural land use will be able to continue among the panel areas should sheep grazing be utilised. Areas directly affected by construction (land beneath panels, construction compounds, BESS and substations) amount to approximately 406 ha; the remainder is land for mitigation, including 55.5ha in Lime Down C that will be retained in light agricultural use, buffers and other habitat improvements. Removal of the agricultural land in the Solar PV Sites from arable production is not expected to directly affect crop yields from adjacent agricultural land. However, the

ExQ	Respondent	Question	Applicant's Response
			Outline LEMP [APP-283] indicates that the diverse grassland that can be established in solar farms can benefit adjacent agricultural land by attracting more pollinator species into the locality.
LSF1.3	The Applicant	**Permanent or Temporary Loss** Given there is no secure commitment to return the land to agricultural use at the end of 60-year operational lifespan, should the ExA consider this land to be permanently removed from agricultural use?	No, as set out in section 2 of the **Outline Decommissioning Strategy [REP-100]**, post-decommissioning of the Scheme, the landowners would choose how the land is to be used and managed. The landowner may return all of the land to agricultural use, although it is likely that established habitats such as hedgerows and woodland would be retained given their potential benefits to agricultural land and the wider farming estate.
LSF1.4	The Applicant	**BMV Land for Ecological Mitigation** ES Chapter 9 [APP-061] lists Skylark mitigation in field B12. Figure 17-2 [APP-172] shows this area as BMV agricultural land. NPS EN-1 states that *'Applicants should seek to minimise impacts on the best and most versatile agricultural land'*. 1) Explain why you have chosen BMV agricultural land as ecological mitigation and if this is the best use of such land.	Field B12 is shown in **ES Volume 2, Figure 17-2 Agricultural Land Classification Mapping [APP-172]** to be mostly Subgrade 3b quality, which is not BMV. The north-west and south-east of the field is BMV quality in Subgrade 3a, which is the lowest of the BMV grades. Fields within the Order Limits were selected for use as mitigation habitat for ground-nesting

ExQ	Respondent	Question	Applicant's Response
		2) Explain what efforts were made to secure an appropriate area for ecological mitigation that is not BMV agricultural land which could have been immediately adjacent the Order limits? 3) Confirm if field B12 would be removed from agriculture for the lifetime of the proposed development, but if not please detail how agricultural activities may be affected.	bird species such as skylark based on several criteria, such as large size (short axis >200m), limited vantage points for predators, e.g. buildings, and minimal extent of adjacent woodland. Fields with these characteristics were chosen to maximise the open sightlines needed for nesting skylark and ensure mitigation habitat is created only in areas considered suitable to support the species. Field B12 fits the criteria and is one of the largest single fields at the Solar PV Sites. Baseline breeding bird surveys recorded seven likely skylark territories within Field B12, the second highest number of territories recorded in a single field at the Solar PV Sites, as shown on **ES Volume 2, Figure 9-4-2 Indicative Skylark Breeding Territories [APP-121]**. Field B12 was therefore considered a highly suitable field for use as skylark mitigation habitat. Habitat creation and management prescriptions for delivery of mitigation habitat areas for ground-nesting birds, including skylark, are set out within the **Outline LEMP [APP-283]**. It is proposed that B12 will be

ExQ	Respondent	Question	Applicant's Response
			managed as species-rich grassland meadow, where it is proposed to manage the habitat via a hay cutting regime, although it would also be possible to manage this habitat through grazing. Grassland either cut for hay or grazed would still be considered to remain in light agricultural use. Management will avoid the key nesting bird season in order to provide suitable nesting conditions for skylark for the lifetime of the Scheme.
LSF1.5	The Applicant	**ES Chapter 17 Conclusions** ES Chapter 17, Table 17.4 [REP1-025] details that the criteria for determining the magnitude of change is considered 'high' when a proposal results in the long term or permanent loss of over 50ha of agricultural land, including a degree of Grade 1 and 2 BMV agricultural land. As there is no secure commitment to return the land to agricultural use post-decommissioning, you are asked to further explain the conclusions of this chapter, which concludes 'no significant effects on soils and agriculture'.	The Applicant disagrees that there is no secure commitment to return the land to agricultural use post-decommissioning. The Decommissioning Strategy is secured by Requirement 20 in Schedule 2 of the **Draft DCO [REP1-007]** and must be in substantial accordance with the **Outline Decommissioning Strategy [REP1-100]**, which states that when the operation and maintenance phase ends, all of the land will be returned to its original use and condition as far as practicable. This means that, post-decommissioning, the land will be immediately available for agricultural use. The Applicant does, however, acknowledge that the

ExQ	Respondent	Question	Applicant's Response
			landowners may choose to continue managing the land as ecological habitat rather than revert back to arable production. This mirrors the existing position whereby there is no obligation on landowners to farm agricultural land. The Applicant disagrees that the assessment of effects on soils and agriculture concludes there to be no significant effects. **ES Volume 1, Chapter 17: Soils and Agriculture [REP1-025]**, Section 17.12 concludes that the residual effect on soils and agriculture is significant.
LSF1.6	The Applicant	**Below Ground Infrastructure and Agricultural Activities** ES Chapter 3 [APP-055] states that as part of decommissioning, below ground infrastructure would be removed to a depth of 1.2m to allow the recommencement of agricultural activities. You are asked to signpost the ExA to details for the restoration of these areas, such as foundations for the BESS and substations within the ES. You are also asked to confirm that this would be reviewed as part of the oDS [REP1-100] to take account of any changes to the depth	The Applicant confirms in Section 2.1 of the **Outline Decommissioning Strategy [REP1-100]** that foundations will be cut to 1.2m below ground level and that appropriate soil will be imported if required to backfill the deeper excavations. The reinstated land will be reseeded. A full agricultural soil profile is considered to be 1.2m depth. By reinstating the soil profiles to 1.2m depth, there will be no limitation to the future agricultural land use caused by reduced soil depths.

ExQ	Respondent	Question	Applicant's Response
		necessary for ploughing in the future should agricultural practices change.	
LSF1.7	The Applicant	**Soil Performance** Paragraph 9.7.29 of ES Chapter 9 [APP-061] states that *'In the absence of the Scheme, it is anticipated that the Solar PV Sites would remain in predominantly arable production, with associated intensive management regimes. Such intensive systems are predicted to entail the continued requirement for additional soil inputs and conditioners, with likely continued, incrementally or accumulatively negative implications for wildlife'*. However, paragraph 17.7.15 of ES Chapter 17 [APP-069] details that soil performance would be expected to remain the same as the current baseline but makes no negative comment on soil performance and/or health. You are asked to comment on the following: The use of the term 'intensive' would suggest an industrial agricultural regime. The applicant should clarify the current farming management arrangements and whether it qualifies as	1) The reference to 'intensive management' within paragraph **9.7.29** of **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]** relates to arable land within the Solar PV Sites being typically subject to practices designed to maximise crop yield, such as rotational monoculture cropping regimes, regular employment of heavy machinery for tilling and harvesting, and routine application of agrochemicals such as herbicides and fertiliser. It is recognised that this type of farming system does have a detrimental impact on wildlife compared with low-input or extensively managed systems, particularly through reducing the availability and diversity of plant species and associated invertebrate communities, which form key food resources for wide range of other wildlife. Such practices are characteristic of conventional arable farming across the UK and are representative of the current baseline conditions within the Solar PV Sites. Almost 90% of land coverage within the Solar PV

ExQ	Respondent	Question	Applicant's Response
		intensive farming. Alternatively, if the current farming arrangements do not qualify as 'intensive' then ES Chapter 9 should be updated to remove the term. It is not clear what the effect on soils and wildlife would be in absence of the proposed development. The applicant should provide a clear and consistent statement across the ES clarifying the effects on both soils and wildlife in absence of the proposed development (a do-nothing scenario). The answer should consider how the land has been, and would be, farmed considering any applicable agri-environment schemes.	Sites is under arable production as summarised in **Table 9-7** of **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]**. It is acknowledged that a proportion of the land will, at any given time, be under alternative management such as set-aside, fallow, or agri-environment schemes, however conventional crop production is the dominant baseline land use across the Solar PV Sites. 2) **ES Volume 1, Chapter 17: Soils and Agriculture [REP1-025]** includes comment on the future baseline at Section 17.7, representing a "do nothing" scenario. The Applicant confirms that soil performance and health, and the agricultural land management and use, are expected to remain as the current baseline conditions should the Scheme not proceed. The landowners' new or continued involvement in future agri-environment schemes cannot be predicted.
LSF1.8	The Applicant	**Soil Sealing** ES Chapter 17 [APP-069] makes no reference to the effects of soil sealing resulting from the	The Applicant provides the full schedule of soil survey findings, including photographs of hand-dug pits, in **ES Volume 3, Appendix 17-**

ExQ	Respondent	Question	Applicant's Response
		foundations of BESS and substations. You are asked to provide a commentary as to the effects and impacts on those areas affected by soil sealing and how these areas would be restored during restoration. Also, how would the method be secured in the dDCO.	**1: Agricultural Land Classification and Soil Resources Survey Report [REP1-063]**. The data demonstrate that the soils in the BESS and main substation locations primarily overlie limestone bedrock at shallow to moderate depth. Given the high proportion of rock, once the topsoil and available upper subsoil resource has been stripped and placed into storage, there is anticipated to be very little soil material remaining in-situ to be sealed. As detailed in the **Outline Decommissioning Strategy [REP1-100]**, restoration of the BESS and substation locations would involve removal of the foundations to 1.2m depth, importation of appropriate soil material to backfill the void as needed, and replacement of the original upper subsoil and/or topsoil that will have been stockpiled within the Scheme. The Decommissioning Strategy is secured by Requirement 20 in Schedule 2 of the **Draft DCO [REP1-007]**. All soil handling and movements will be undertaken in accordance with the detailed SRMP which is secured by Requirement 17 of the **Draft DCO [REP1-007]**.

ExQ	Respondent	Question	Applicant's Response
LSF1.9	The Applicant	**Outline Soil Resources Management Plan (oSRMP)** Wiltshire Council has commented that the oSRMP [APP-280] should make specific reference to the use of soil boreholes to be analysed by a suitably qualified soil scientist rather than just 'site inspections'. You are requested to update the oSRMP [APP-280] to take account of this request or provide a robust response detailing why the use of boreholes and scientific analysis cannot be incorporated into the oSRMP.	The Applicant notes the comment and has updated the **Outline SRMP [EN010168/APP/7.15]** (Revision 2) at Deadline 3. Measures to be taken to monitor and protect soil resources at decommissioning have been incorporated, as per the request from Wiltshire Council.
LSF1.10	The Applicant	**Soil Health** What efforts, if any, would you undertake to ensure appropriate soil health over the lifespan of the proposed development to ensure the land within the Order limits could be returned to the same grade following decommissioning. Your response should also include the land proposed for ecological mitigation and enhancement. In providing a response you should take account of SLD's 'Situation Report: Lime Down Solar Farm. Impact on Soils and Agriculture'.	One of the main themes of SLD's 'Situation Report: Lime Down Solar Farm. Impact on Soils and Agriculture' **[REP1-175]** is the consequences of *not* implementing a SRMP, primarily extreme soil compaction and smearing. A SRMP will be implemented for the Scheme. Adherence to the SRMP and to the best practice principles for soil handling and management will prevent the occurrence of the type of damage depicted in SLD's report.

ExQ	Respondent	Question	Applicant's Response
			The Applicant acknowledges in **ES Volume 1, Chapter 17: Soils and Agriculture [APP-069]**, the potential for soils to become compacted during construction, and states that remedial action must be taken where compaction is identified. The **Outline SRMP [APP-280]** goes on to set out how continuous, live monitoring of the soil during construction will be undertaken, and that remediation of any compaction identified must be actioned before panels are fixed, while the ground remains accessible to machinery. The in-situ soil resource is anticipated to enter the operation and maintenance phase in an un-compacted state, enabling soil health parameters to develop naturally. The detailed SRMP will continue to apply throughout the operation and maintenance, and decommissioning phases of the Scheme, including the principles such as the field tests for identifying appropriate windows for soil handling and trafficking.

ExQ	Respondent	Question	Applicant's Response
			Protection of the soil resource throughout the lifetime of the Scheme will enable to land to be reinstated to its original use and condition as far as practicable. Land proposed for mitigation and ecological enhancement will primarily remain in-situ and undisturbed throughout the operation and maintenance phase. There are not anticipated to be changes to the physical soil properties that would alter the agricultural land grading
LSF1.11	The Applicant	**Soil Health** You are asked to provide a response to SLD's submission 'Runoff from Solar Panels at Lime Down' by Professor Richard Skeffington, specifically the article titled 'Plant and soil responses to ground-mounted solar panels in temperate agricultural systems' [REP1-175].	The paper referred to compares soil chemical properties and vegetation cover of land beneath solar panels, in the gaps between solar panels, and adjacent agricultural land under permanent pasture. The study does not include any arable land in the comparisons, and therefore the conclusions cannot be assumed to be applicable to Lime Down or any other arable conversion to grassland. The study does not note the soil physical properties in terms of soil texture (which directly affects the chemical properties as well as other physical characteristics), or baseline conditions in terms of soil structures. As above,

ExQ	Respondent	Question	Applicant's Response
			the results cannot therefore be assumed to apply across all soil types. Soils were sampled to depths of 5cm or 10cm which is not representative of the full topsoil horizon. Bulk density measurements as a measure of compaction therefore do not apply to a whole topsoil and cannot be relied upon as proof of installation of solar panels causing soil compaction.
LSF1.12	The Applicant	**Soil Management** ES Chapter 17 [REP1-025] clearly states that no grazing would occur inside the solar PV sites and buffer zones would be maintained via cutting. Given SLD's submission that the soils are susceptible to compaction, provide details as to best practice to avoid damage to soil health and hydraulic properties, and incorporate these into the oCEMP [REP1-096], oOEMP [REP1-098] and oSRMP [APP-280]. For example, this could include grass cutting and panel cleaning only during periods of dry weather. Furthermore, soils beneath the solar panels would be left in shade. Please provide	**ES Volume 1 Chapter 17: Soils and Agriculture [REP1-025]**, Section 17.9 confirms that sheep grazing has not been relied upon for mitigation, but that there are no known restrictions that would prevent the land being grazed. In its current revision, the **Outline SRMP [APP-280]** includes details of best practice measures to avoid or minimise effects on soil health. The Applicant has updated the **Outline SRMP [EN010168/APP/7.15]** (Revision 2) for Deadline 3 to add further clarification that the principles of the SRMP will apply throughout operation and maintenance, and decommissioning, not only the construction

ExQ	Respondent	Question	Applicant's Response
		comment as to how this shading would affect soil health over a 60-year period	phase of the Scheme. The clarifications encompass activities such as grass cutting and panel cleaning. As sunlight does not typically penetrate below-ground, there are not anticipated to be direct effects of shading from panels on soil properties. The Applicant acknowledges there may be some impact of shading on vegetation establishment and below-panel microclimate, however this is likely to only affect the surface layers of soil.
LSF1.13	The Applicant	**Decommissioning – Soil Storage and Soil Stability** What assessments have been made into the safety of soil storage and repurposing of soil bunds during decommissioning, particularly in relation to the leaching of heavy metals or other contaminates into the soil, which is then proposed for a return to agricultural use?	The **Outline SRMP [APP-280]** references best practice guidance applicable to each stage of soil handling, including stockpiling. Measures will be further developed and incorporated within the detailed SRMP, and will include maximum stockpile dimensions, principles for siting stockpiles, and ensuring that the surfaces are seeded. The **Outline SRMP [APP-280]** notes at paragraph 1.8.24 that stockpiled soils may need to be sampled for nutrients prior to being used in restoration, to inform suitability for reuse.

ExQ	Respondent	Question	Applicant's Response
			By handling the soil resources according to the principles of the SRMP, there are no identified mechanisms by which heavy metal contamination would enter the stockpiled soil.
LSF1.14	The Applicant	**Soil Management Plan – Mixing of Soils** What documentation and physical control measures would be put in place to prevent accidental mixing of soils? How would these measures be secured through the dDCO?	The detailed SRMP will incorporate the soil profile data presented in **ES Volume 3, Appendix 17-1: Agricultural Land Classification and Soil Resources Survey Report [APP-243]**, which records the specific depths of topsoil and will be used to guide stripping depths. In practice, topsoil and upper subsoil resources are usually easily distinguishable by colour, which enables the full topsoil resource to be recovered without incorporating excess subsoil material. This guideline will be included in the SRMP, which is secured through Schedule 2, Requirement 17 of the **Draft DCO [REP1-007]**. In each demarcated area to be stripped, the whole topsoil resource is stripped first and then subsoil. As the two resources are managed separately throughout the stripping and stockpiling process, accidental mixing is prevented.

ExQ	Respondent	Question	Applicant's Response
LSF1.15	The Applicant	**Soil Management Plan - Stockpiles** How would the suitability of soil stockpiles for restoration be assessed? Please confirm whether the final Soil Resources Management Plan would include a restoration methodology?	The **Outline SRMP [APP-280]** presents a list of the details and records that must be kept for each soil stockpile constructed, including provenance and soil type. This is to ensure that all of the recovered soil material is identifiable throughout the lifetime of the Scheme, and that all of the soil resource will be reused in a suitable manner (i.e. as topsoil or subsoil). Paragraph 1.8.24 makes provision for soil stockpiles to be sampled in order for the nutrient status to be ascertained prior to its reinstatement such that nutrient amendments can be made before seeding if necessary. The detailed SRMP will include current best practice measures for soil reinstatement, noting that best practice may evolve over the lifetime of the Scheme.
LSF1.16	The Applicant	**Soil Management Plan – Reinstatement Gaps** Please confirm why the oSRMP [APP-280] does not include measures to return hardstanding to agricultural use?	The **Outline SRMP [APP-280]** notes at paragraph 1.8.26 that areas of temporary compounds and access tracks will be reinstated according to best practice. This encompasses all areas of temporary hardstanding.

ExQ	Respondent	Question	Applicant's Response
			The Applicant has updated the **Outline SRMP [EN010168/APP7.15]** (Revision 2) for Deadline 3 to clarify that hardstanding will also be decommissioned and available for agricultural use.
LSF1.17	Wiltshire Council	**Soil Management Approach** You are asked whether the approach and content of the oSRMP [APP-280] in respect of the management of potential effects on soil resources is appropriate? If not, please detail additional methods and/or mitigation measures considered necessary.	The **Statement of Common Ground with Wiltshire Council [REP2-025]** noted that "The council would recommend a comprehensive soil survey with test holes dug to look for signs of soil compaction following decommissioning of the site, with remedial actions like sub-soiling to address any compaction prior to the return to agricultural use." The Applicant has updated the **Outline SRMP [EN010168/APP7.15]** (Revision 2) at Deadline 3 to include clarification that the principles will apply throughout all phases of the Scheme; updates to monitoring procedures; and specification that measures at decommissioning will include the observation or soil cores and pits in order to identify soil compaction or other issues, and implementation of remedial action as necessary.

ExQ	Respondent	Question	Applicant's Response
LSF1.18	The Applicant	**Community Orchard** ES Figure 3-4-3.1 to 3-4-3.2 [REP1-030] suggests the provision of a community orchard in Field C25. Please detail the following: 1) How community consultation informed the choice to provide a community orchard. 2) How community consultation informed the location for the community orchard. 3) Who would manage the orchard. 4) How the community orchard and its management is secured in the dDCO. 5) How a community orchard would be compatible with land identified as a Proposed Ground Nesting Bird Mitigation area on ES Figure 3-4-3.1 to 3-4-3.2.	The Applicant confirms that the community orchard at Lime Down C was identified as a potential community benefit and environmental enhancement and was consulted on during Stage Two statutory consultation. Details were included in the Project Information Booklet. Whilst the Applicant is not seeking to secure the implementation of the orchard within the DCO, following community consultation, locations and ways to provide such a benefit led to preliminary discussions taking place with a suitably experienced organisation regarding the potential establishment and ongoing management of a community orchard. These discussions are at an early stage, and no formal appointment or binding commitment has yet been made. The Applicant would continue engagement with potential orchard operators and relevant community stakeholders as the detailed proposals are developed, with the objective of securing an appropriately experienced organisation to establish and manage the orchard prior to its implementation.

ExQ	Respondent	Question	Applicant's Response
			The proposed location in Field C25 was selected having regard to a suitable access route, existing landscape context, land availability, operational requirements and opportunities to integrate the orchard into the Scheme's design. The compatibility of a community orchard with the context of the Scheme, would ensure that it does not undermine the function of the mitigation area, including through appropriate consideration of orchard extent, tree spacing, vegetation management, disturbance and the timing of works.

2.15 Noise and Vibration

ExQ	Respondent	Question	Applicant's Response
NV1.1	The Applicant	**Operational Phase Noise** Paragraph 14.4.12 of ES Chapter 14 [REP1-021] states that a series of assumptions were made for the generation of the operational noise model, primarily concerning the sound power levels of the operational plant, their time of operation and the local environment. Can the applicant explain why there is no commitment to revisit these assumptions at the design stage once actual sound power levels are known?	The Applicant agrees that this is an important exercise and has committed to doing just this in Table 8 of 7.13 **Outline OEMP [REP2-021]**. Therein it states that: *"The Applicant will remodel operational noise from the Scheme with respect to the final design, including required plant mitigation, to demonstrate that there would be no significant operational noise effects arising from the Scheme as built. The results of this remodelling, including details of the final plant mitigation measures, will be submitted to the relevant local authority."* Furthermore, Table 8 of the **Outline OEMP [REP2-021]** commits to noise at sensitive receptors following this exercise being no higher than those calculated to inform **ES Volume 1, Chapter 14 Noise and Vibration [REP1-021]**.
NV1.2	The Applicant	**Tracker Panel Noise** Paragraph 14.4.17 of ES Chapter 14 [REP1-021] states that from manufacturer specification sheets, it is known that the noise from each solar PV panel tracker motor would	While the Applicant accepts that paragraph 14.4.17 of **ES Volume 1, Chapter 14 Noise and Vibration [REP1-021]** is phrased in terms of a single tracker motor, it can confirm that an array of tracker motors has been assessed as

ExQ	Respondent	Question	Applicant's Response
		be less than 50 dB at a 1m distance and less than 40 dB at a 3m distance and that this level of noise would be unlikely to be perceptible at sensitive residential receptors, such that tracker noise emissions have not been considered in the operational noise assessment. Can the applicant: Clarify if it has assessed the level of noise from all panels in a field moving together at the same time on sensitive receptors, or if it has used the single motor decibel level to arrive at its position that this level of noise would be unlikely to be perceptible at sensitive residential receptors? Direct the ExA to where it has assessed and detailed the noise effects of tracker motors on public rights of way receptors? If it has not undertaken such an assessment, explain why not, particularly in light of SLD's expert's assessment of the applicant's noise assessment [REP1-179], which identifies bridleways, footpaths or byways SHER16, NORT1, SHER18, LUCK57, NORT11,	producing levels of 15-20 dB at 100m, which would not have a material impact on the operational noise results. The noise effects of tracker motors on public rights of way have not been assessed as it would give rise to levels around 30 dB at the closest point (noting that a minimum 15m separation is committed to in paragraph 4.1.2 of the 7.17 **Outline PROWPPMP [REP1-104]** for the brief period in which tracking motors were operating. This is below the likely ambient level on a PRoW, identified as 35-45 dB in paragraph 5.3.1 of the **SLD noise report [REP1-179]**. Where the SLD report refers to notable plant noise on the identified PRoW, in paragraph 5.40 of their report, it is referencing noise from the conversion units and noise from tracker motors would not impact these levels. This point is responded to in SLD-230 of 9.22 **Applicant's Response to Written Representations [REP2-039]**, and further information on noise on PRoW is provided in the response to NV1.9 below.

ExQ	Respondent	Question	Applicant's Response
		HULL1,2,4,5,6,7 and MALW59 as being subject to notable plant noise levels.	
NV1.3	The Applicant	**132 kV Substation Operation** Paragraph 14.4.20 of ES Chapter 14 [REP1-021] states that the 132kV substations are only to be operational during the daytime. Can the applicant explain why this is the case and whether any controls are required or in place to regulate this?	The 132kV substations act to collate the electricity produced by each solar sub-site of the Scheme and pass it on to the 400kV substation and beyond that into National Grid's transmission network. The solar sites will only be generating power during daylight and thus the 132kV substations will only be utilised in daylight hours. Other infrastructure such as the 400kV substation is fed into by the BESS, which may charge and discharge during the night, so as per paragraph 14.4.20 of **ES Volume 1, Chapter 14 Noise and Vibration [REP1-021]** that has been assumed to be operational at night. Given that the solar panels will not be operational at night and therefore the 132kV substations will not have electricity flowing through them over this period, it would not be possible for these to operate at night. Even if it were, the ES has assessed effects from the 132kV substations on that basis, and so they have been assessed as not generating any noise or vibration at night. The ExA should

ExQ	Respondent	Question	Applicant's Response
			have comfort that this provides a sufficient control under the DCO, as any night time operation from such substations would result in a new or materially different environmental effect to what was assessed in the ES, and so would trigger the relevant enforcement mechanisms to rectify.
NV1.4	The Applicant	**Representative Monitoring Locations** On page 22 of ES Chapter 14 [REP1-021], the applicant states that monitoring location LT7 has not been used as a proxy for baseline sound levels at receptors due to the atypical results at this location, particularly at night. No further information about what makes the results at this location atypical is provided in the Chapter or in any of the accompanying appendices. The applicant is required to elaborate on why monitoring location LT7 has been excluded?	The sound level meter at LT7 stopped monitoring after approximately 14 hours of a week-long survey, due to a technical issue with the meter. The limited data collected was inconsistent with typical expectations for a rural setting, as the background night-time sound levels were over 10 dB higher than those during the daytime, in contrast with all other measurement locations where background sound levels were typically around 10 dB lower. The measured sound data for LT7 can be seen in Plate 7 of **Appendix 14-3 Baseline Noise Survey [APP-236]** for reference. Given both the unusual results and the limited amount of data, it was determined that LT7 was not a reliable proxy for baseline sound levels as it would represent an artificially high

ExQ	Respondent	Question	Applicant's Response
			background level against which to compare noise from the Scheme. LT7 would have been used to inform the baseline sound level at R24 and R25, for which data from LT8 was used instead and is considered representative of the area.
NV1.5	Wiltshire Council	**BS 4142:2014 and Operational Noise Effects** Paragraph 14.6.33 of ES Chapter 14 [REP1-021] states that *'where background levels are low, the absolute levels might suggest a more acceptable outcome than would otherwise be suggested by the difference between the values (existing and proposed noise rating levels). As such, where background noise levels are identified as being below the 'very low' threshold of 30dB, a background noise level of 30dB LA90 has been adopted with respect to the setting of operational noise LOAEL and SOAEL5.'* The ExA note in row 3 of Table 14-2 of ES Chapter 14, that the Council confirmed the use of 30dB as a minimum background noise level to be appropriate at the scoping stage.	The Applicant would direct interested parties to SLD-233 to SLD-235 of 9.22 **Applicant's Response to Written Representations [REP2-039]** for further clarification and justification of the Applicant's approach.

ExQ	Respondent	Question	Applicant's Response
		However, SLD's expert's submission at D1 [REP1-179] casts considerable doubt on the appropriateness of this methodology and the applicant's justification for it. SLD's expert states (amongst other things) that the applicant's methodology ignores the context of a very quiet rural area and adopts a "one size fits all approach", which artificially elevates the baseline and thus minimises the noise effects of the development on sensitive receptors. It also provides examples of this in action for several residential receptors (Townleaze Farm and Bradfield Manor). The Council is requested to review SLD's submission [REP1-179] and advise the ExA whether it still agrees with the applicant's justification for using an absolute background noise level of 30dB, or if (and why) it now agrees with SLD's concerns that raising the baseline in this way modifies the relevant thresholds for the LOAEL and the SOAEL and thus underplays the noise effects.	
NV1.6	The Applicant	**Operational Noise Results Summary**	Calculated levels at R10 and R20 at night are less than 5 dB above the background, and therefore below SOAEL. However, when

ExQ	Respondent	Question	Applicant's Response
		Table 14-23 of ES Chapter 14 [REP1-021] presents the operational noise results summary. It records zero receptors above SOAEL during the day and night-time periods. However, Table 9 of ES Appendix 14-4 [REP1-061] reports Receptors R10 (Bradfield Farm) and R20 (Townleaze Farm) experiencing a SOAEL at night-time. The applicant is required to review this discrepancy along with the statement made in paragraph 14.10.51 of ES Chapter 14, which states these receptors experience adverse effects between LOAEL and SOAEL during the night-time. If on review, the operational noise at the aforementioned receptors would be above or equal to SOAEL, the ExA requires an additional analysis setting out proposed mitigation to reduce the noise impact (this is without prejudice to the methodology positions raised in ExQ1 NV1.5 above).	rounded up to the nearest decibel, they are 5 dB above background and at the SOAEL, as reported in Table 9 of **ES Appendix 14-4 [REP1-061]**. The Applicant accepts this apparent discrepancy and has already provided, in WC-283 of 9.1 **Applicant's Response to Relevant Representations (Part 1) [PDA-009]**, an example of how levels could be brought below the SOAEL even when rounded up to the nearest decibel. Table 8 of 7.13 **Outline OEMP [REP2-021]** commits to the avoidance of significant operational noise effects in the final design. Furthermore, Wiltshire Council's relevant representation, also found at WC-283 of the **Applicant's Response to Relevant Representations (Part 1) [PDA-009]**, clarifies that they are content that such levels at night do not constitute a significant adverse effect given the internal levels they would give rise to would be below those required for good sleeping conditions. The commitment to avoid significant adverse effects is made in Table 8 of 7.13 **Outline OEMP [REP2-021]** and agreed with Wiltshire

ExQ	Respondent	Question	Applicant's Response
			Council in item 3.10.7 of 8.2 **Statement of Common Ground with Wiltshire Council [REP2-025]**.
NV1.7	The Applicant	**Receptors R10 and R20** The applicant is required to explain the statement made in paragraph 14.10.52 of ES Chapter 14 [REP1-021] that the night-time rating level at Receptors R10 and R20 can be defined as being a low rating level, particularly in light of paragraph 14.6.31 which states that *'BS 4142 does not define 'low' in the context of background sound levels nor rating levels. The note to the Scope of the 1997 version of BS 4142 defined very low background sound levels as being less than about 30 dB LA90, and low rating levels as being* ***less than about 35 dB LAr,Tr****.'* (**Bold** text is ExA's emphasis).	As explained in the response to NV1.6, the external noise levels at R10 and R20 at night-time are below 35 dB $L_{Ar,Tr}$, albeit by less than 1 dB. In light of both this, and the fact that such levels would lead to barely perceptible internal levels of below 25 dB, even with windows open, the Applicant considers it is justified to class such rating levels as low, while acknowledging that such levels are at the higher end of what may be termed low.
NV1.8	The Applicant	**Environmental Impact Assessment Methodology 2** Paragraph 6.7.7 of ES Chapter 6 [APP-058] states that, as a general rule, effects categorised as moderate, major/moderate, and major are considered significant in EIA terms, whereas those classified as moderate/minor or	With reference to national policy for noise and vibration, significant effects are identified above the SOAEL. As set out in Table 14-14 of **ES Volume 1, Chapter 14 Noise and Vibration [REP1-021]**, moderate effects for the high sensitive receptors listed in Table 14-12 and Table 14-

ExQ	Respondent	Question	Applicant's Response
		below are not. The ExA note that in paragraph 14.6.44 of ES Chapter 14 (Noise) [REP1-021], only effects predicted to be major/moderate or major are considered significant in the context of the EIA for noise and vibration. The applicant is required to explain the implications of excluding adverse moderate effects from the classification of significance.	13, correspond to levels above the LOAEL and below the SOAEL. Therefore, they are excluded from the classification of significance for noise and vibration as they are below the SOAEL. Hence the departure from the general rule of Chapter 6.
NV1.9	The Applicant	**Receptors** Table 14-11 of ES Chapter 14 [REP1-021] defines the types of receptors that sit within high, medium and low noise sensitivity categories. The applicant states it has used ISEP Guidelines for Environmental Noise Impact Assessment (2014) to define potentially affected receptors and their sensitivity level; however, the ISEP Guidelines includes farms, open air amenities (for example public rights of way and areas of landscape value) and wildlife sites and fauna as possible receptors that may need to be considered. Such receptors are notably absent from the applicant's Table 14-11 and the noise and vibration assessment generally.	Paragraphs 14.6.47 to 14.6.51 of **ES Chapter 14 Volume 1, Noise and Vibration [REP1-021]** explain the likely noise impacts of the Scheme on public rights of way users, such as walkers, cyclists and horse riders, and why they are not considered further as receptors in the assessment. This approach and conclusion are consistent with many consented solar farms in quiet rural areas, such as Tillbridge Solar (S.I. 2026/487), Cottam Solar Project (S.I. 2024/943) and East Yorkshire Solar Farm (S.I. 2025/585). Nevertheless, further clarification is provided in this response. With reference to Table 14-21 of **ES Volume 1, Chapter 14 Noise and Vibration [REP1-021]**, construction traffic noise impacts are expected to be low and

ExQ	Respondent	Question	Applicant's Response
		NPS-EN-1 recognises at paragraph 5.11.30 that *'Public Rights of Way, National Trails, and other rights of access to land are important recreational facilities for example for walkers, cyclists and horse riders. The Secretary of State should expect applicants to take appropriate mitigation measures to address adverse effects...'* Similarly, NPS EN-3 at paragraph 2.10.42 provides that applicants *'are encouraged to design the layout and appearance of the site to ensure continued recreational use of public rights of way where possible during construction, and in particular during operation of the site.'* The applicant is required to rectify the deficiencies noted above in the applicant's noise and vibration assessments with regard to potential effects on walkers, cyclists and horse riders within close proximity to the Order limits and the construction traffic routes. Whilst the ExA acknowledge that the use of PRoW or roads by those receptors may be linear and transient, we note that plant noise hum is expected to be permanent and continuous throughout the 60 year operational period,	overall increases in noise exposure to users very limited. While the Applicant acknowledges that this is based on an average over the day, individual vehicles will be subject to the controls committed to in Section 6.2 of the **Outline CTMP [REP1-112]**, and with such measures in place the continued recreational use of PRoW where possible is ensured, in line with national policy. It is anticipated that PRoW which cross the Order Limits will generally remain open during the construction phase of the Scheme. There may be the requirement for temporary closures of PRoW during construction where the Grid Connection Cables cross existing PRoW. This will only be required when the Grid Connection Cables are being installed and will likely not last more than a day and alternate routes will be provided. Where closures are deemed to be necessary, these will be prioritised for overnight work, will be temporary in nature and supported by appropriate amount of notice with closure times and dates clearly provided, and, if appropriate, suitable diversions provided for recreational routes.

ExQ	Respondent	Question	Applicant's Response
		such that it could reduce the use, tranquillity and enjoyment of the area. As such, the ExA expects the noise effects of the proposed development on those receptors to be appropriately considered by the applicant or robustly justified in its absence.	The **Outline PRoW and Permissive Path Management Plan (Outline PROWPPMP) [REP1-104]** contains specific measures for the temporary diversion of footpath WT|GRIT|20 and bridleway WT|MALW|54, where access to Cable Route Corridor works east of Grittleton, and HGV access to Lime Down E are taken respectively. These diversions are proposed to ensure unreasonable effects to PROW users are not experienced during construction, replacement and decommissioning. To help understand the levels of operational noise users of PRoW would be exposed to, the Applicant has overlaid the PRoW on the daytime noise contour map in Figure NV1.9, appended to this response. A similar figure was created in the **SLD noise report [REP1-179]**. It shows that levels on PRoW would range from imperceptible to the level of regular conversation (50-60 dB) when directly adjacent to a conversion unit. This supports the conclusion of Section 14.6 of **ES Volume 1, Chapter 14 Noise and Vibration [REP1-021]** that while would be audible in certain locations, this would be transient and the overall picture

ExQ	Respondent	Question	Applicant's Response
			is one of relatively low levels of noise not dissimilar to existing ambient levels presented in **ES Appendix 14-3 Baseline Noise Survey [APP-236]** and so there are no significant adverse effects on health. Figure NV1.9 also highlights that the design is sympathetic to PRoW users in siting the central substation and BESS area away from such routes. Additionally, the commitment to a minimum 15m separation of all infrastructure from PRoW, as stated in paragraph 4.1.2 of the 7.17 **Outline PROWPPMP [REP1-104]** ensures operational noise levels, even when close to plant, remain around the daytime ambient levels presented in Table 1 of **ES Appendix 14-3 Baseline Noise Survey [APP-236].** With respect to wildlife sites and fauna, the noise impacts on sensitive ecological receptors have been considered in **ES Volume 1, Chapter 9 Ecology and Biodiversity [REP1-015**] and the conclusions are that noise levels are likely to be below thresholds at which significant wildlife behavioural changes are likely, and as such there would be no

ExQ	Respondent	Question	Applicant's Response
			significant adverse effects resulting from sources of operational noise.
NV1.10	The Applicant	**BESS, Substations and Public Rights of Way** Paragraph 14.9.10 of ES Chapter 14 [REP1-021] states that the BESS area and 132 kV and 400 kV substations have been located a minimum of 450m and 400m from sensitive receptor locations respectively. Can the applicant confirm if this statement relates only to the receptors included in Table 14-11 of ES Chapter 14? If so, can the applicant provide details of the BESS area and substation(s) distances from pastoral farms, designated PRoW, stud farm establishments, proposed permissive PRoW, wildlife sites and any areas with known presence of fauna?	The Applicant can confirm that this statement relates to the high sensitivity receptors included in Table 14-11 of **ES Volume 1, Chapter 14 Noise and Vibration [REP1-021]**. The details of the closest distances to the BESS area and substations of the other sites are provided in Table NV1.10, appended to this response.
NV1.11	The Applicant	**BESS Bund and Barrier** The ExA note that a 2m bund with additional 3m barrier around the eastern and southern boundary of the BESS area is proposed to attenuate noise and to reduce visual impacts. Paragraph 14.9.11 of ES Chapter 14 [REP1-021] cross refers the ExA to ES Figure 3-3	The Applicant acknowledges the request for further information regarding the proposed bund and barrier along the boundary of the BESS area. At this stage, the design shown in the Environmental Statement represents a parameter based indicative design sufficient to

ExQ	Respondent	Question	Applicant's Response
		[APP-083]. That figure is a basic layout plan of the BESS and 400 kV substation. The ExA requires an elevation and cross section detail of the proposed bund and barrier. The ExA also requires information on the proposed bund and barrier material and colour, fixing mechanism, and resilience to adverse weather, such as high winds and corrosion. The ExA also notes that silencer units are proposed on 75% (198) of BESS containers. Can the applicant explain why silencer units are not proposed on all BESS containers?	establish the maximum extent of the mitigation required. The current proposal is for a 2m high earth bund, which most likely will be formed using onsite soil from Lime Down D, with an additional 3m acoustic barrier, which provide an effective screening height of approximately 5m along the southern and eastern boundaries of the BESS site. These parameters have informed the landscape, visual and operational noise assessments reported in the Environmental Statement. The final elevation, cross-section, materials, colour, foundation and fixing arrangements will depend on the detailed design of the BESS. These matters would be controlled through Requirement 5 of the **draft DCO [REP1-007]** within the maximum parameters identified in the **Design Principles and Parameters [REP1A-007]**. Such detailed design matters will also require Wiltshire Council approval through the discharge of requirement process. The Applicant has calculated operational noise levels at the closest receptors to the central BESS area, with silencer units on 100% of the BESS containers, and found that this only

ExQ	Respondent	Question	Applicant's Response
			leads to a 1 dB reduction at 7 of the 45 receptors listed in Table 14-12 of **ES Chapter 14 Noise and Vibration [REP1-021]** (with no reduction at the other 38). While national policy does require adverse impacts between the LOAEL and SOAEL to be mitigated and minimised, this is within Government policy on sustainable development whereby the wider economic and social impact needs to be considered, see paragraph 2.18 of the Noise Policy Statement for England. It is the Applicant's position that further silencer units, leading to imperceptible reductions in noise are not necessary, and that fitting silencers to 75% of BESS containers already represents an appropriate, precautionary and proportionate level of mitigation. This is in line with other consented solar farm applications in which proportionate mitigation is applied only for certain receptors. For example, Longfield Solar Farm (S.I. 2023/734) in which mitigation was proposed around selected inverters and not at all to the BESS.

2.16 Resource and Waste Management

ExQ	Respondent	Question	Applicant's Response
RWM1.1	The Applicant Wiltshire Council	**Anticipated Construction and Operational Waste Quantities** The Infrastructure Planning (EIA) Regulations 2017 state that the description of the development should include an estimate, by type and quantity, of types of waste produced during the construction and operational phases (Schedule 4 Paragraph 1(d)). Anticipated quantities of waste have not been provided in ES Chapter 3 [APP-043], the oCEMP [REP1-096] or the oOEMP [REP1-106] for the construction and operation phases. The applicant: In line with the above Regulations you are asked to confirm the anticipated volumes of waste from the proposed development at all phases of the development, and the impact of waste generation on the capacity of local waste management facilities. Please confirm if these volumes of waste been accounted for in the GHG calculations. Wiltshire Council:	Quantities of waste are provided in **ES Volume 1, Chapter 20: Other Environmental Matters [APP-072]** for Construction (Table 20-7), Operation (paragraph 20.3.73) and Decommissioning (Table 20-8). A cross reference to Chapter 20 Other Environmental Matters is provided in paragraph 3.4.49 of **ES Volume 1, Chapter 3 The Scheme [APP-055].** There is no specific requirement in The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (Ref 30) to assess the impact of waste generation on the capacity of local waste management facilities. As outlined in **ES Volume 3, Appendix 20-3 Materials and Waste Methodology and Baseline [APP-260]** waste has been assessed in accordance with the Institute of Environmental Management and Assessment (IEMA, now ISEP) (2020) (Ref 40). IEMA Guide to: Materials and Waste in Environmental Impact Assessment, Guidance for a Proportionate Approach and the sensitive receptor is landfill capacity in the region not the

ExQ	Respondent	Question	Applicant's Response
		In considering the number of solar schemes already approved, and the number in the planning and pre-planning stages, you are asked to comment on the current capacity of waste management facilities. Are you satisfied that sufficient capacity exists to manage the anticipated generated volume of waste?	current capacity of other waste management facilities. A cumulative waste assessment is included in paragraph 20.3.99-20.3.116 of **ES Volume 1, Chapter 20: Other Environmental Matters [APP-072]**. The cumulative assessment considers solar farm developments in Wiltshire. Waste streams during the construction phase which have been assessed for their GHG Emissions include sewage waste and excavated ground material which cannot be reused. During the operational phase, sewage waste and waste from packaging has been taken into consideration.
RWM1.2	The Applicant	Below Ground Cables at Decommissioning At the end of the operational phase, it is proposed that all the below ground cables **would be left in place. NPS EN-3 states that generally, it is expected that the panel arrays and mounting structures will be decommissioned, and underground cabling dug out to ensure that prior use of the site**	As stated in the **Outline Decommissioning Strategy [REP-100]** and **ES Volume 1, Chapter 3: The Scheme [APP-055]** the mode of removing the Interconnecting Cables and Grid Connection Cables during decommissioning would be dependent upon government policy and good practice at the time, noting a distinction can be made between lower-voltage and higher-voltage electrical

ExQ	Respondent	Question	Applicant's Response
		can continue. You are asked to explain the following: The reasoning for leaving the below ground cables in place. Whether there would be adverse effects or potential hindrance to use of the land associated with the cables being left in place.	cables. Lower-voltage cables, generally up to 33 kV, would be located within the Solar PV Sites and would typically be installed at shallower depths, around 0.4 m. Higher-voltage cables, including 132 kV interconnecting cabling and 400 kV grid connection cables, will be installed at a greater depth of 1.2 m. At the end of the Scheme's operational life, the Applicant expects that lower-voltage cables within the solar generating station sites would be more suitable for removal as part of the wider decommissioning works to assist in returning the land to its previous use. Removal of lower voltage cabling would generally be more practicable because they are located in the same land parcels where other infrastructure, including solar panels, mounting structures and associated equipment, would also be removed. For the higher-voltage cables and associated ducting, where no other infrastructure exists, it could be determined that these should remain in situ where their removal would result in greater environmental disturbance than leaving

ExQ	Respondent	Question	Applicant's Response
			them in place. This would be particularly relevant along the cable route, where the cables would be buried at greater depths and their removal could require substantial excavation and further disturbance to soils, habitats, land drainage and existing land uses.
RWM1.3	The Applicant The Environment Agency All Local Authorities	Waste Can each party provide commentary on the proposed development's compliance with the Regulations: Waste Electrical and Electronic Equipment (WEEE) 2013?	The Applicant will comply with the Waste Electrical and Electronic Equipment Regulations 2013 (as amended) (Ref 40) (as outlined in Table 15: Materials and Waste of **Outline OEMP [REP2-021]** and Table 15: Materials and Waste of the **Outline Decommissioning Strategy [REP1-100]**) for example, separating waste streams and transporting waste via licensed waste hauliers to waste management sites which hold the necessary regulatory authorisation and/or permits for those wastes consigned to them.

2.17 Socio-Economic

ExQ	Respondent	Question	Applicant's Response
SE1.1	The Applicant	**Permissive Paths** Wiltshire Council Highways' consultation response (March 2025), which is summarised in ES Chapter 13 [REP1-019], states that the creation of additional PRoW could be of considerable benefit to PRoW users, especially if MALW50 and GSOM15 were able to be linked to the PRoW network. It was noted that these two footpaths currently terminate at a point where no onward highway rights exist. You are asked to advise how you have responded to this request for MALW50 and GSOM15 connections?	The Applicant undertook pre-application discussions with Wiltshire Council's Public Rights of Way and Countryside Access Team to determine where the Scheme could deliver benefits to the local PRoW network. While connections to MALW50 and GSOM15 were explored, it was determined that the Scheme could not deliver onward connectivity within the powers of the DCO. To create onward highway connection, this would have required third party land outside the Order Limits, would have required new rights of way to be established that may prejudice the future use of the land within the Order Limits, and would have had environmental effects on hedgerows, trees and waterbodies (a stream and pond) that may substantially alter the Applicant's approach to drainage and ecological mitigation. The Applicant acknowledged these in its responses to 'WC-217' and 'WC-274' in **The Applicant's Response to Relevant Representations (Part 1) [PDA-009]**. The Applicant is however still discussing if improvements to MALW50 and GSOM15 can

ExQ	Respondent	Question	Applicant's Response
			be delivered through the allocated funding within the Community Benefit Fund, with Wiltshire Council leading on establishing new rights of way with the engagement of the relevant landowners. The Applicant confirms that details to secure these measures are still under discussion, as demonstrated through the **Statement of Common Ground with Wiltshire Council [REP2-025]**.
SE1.2	The Applicant	**Agricultural/ Rural Employment** ES Chapter 16 [APP-068] details that a total of 20 full-time equivalent (FTE) agricultural jobs and a further 50 FTE tourism related jobs would be lost. Clarify whether these figures are for the construction years only or represent the total loss for the entire duration of the project. Clarify how these figures have been determined. Explain how these job losses may impact on local services, such as village shops, pubs and recreation facilities.	1) The loss of 20 FTE agricultural jobs has been considered static at all phases of the Scheme, as this is based on the employment lost or displaced as a result of the Solar PV Array, BESS and substation areas not being under agricultural use for the project lifetime (all phases). This has been set out in Tables 16-10, 16-13, 16-14 and 16-16 in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**. The loss of 50 FTE tourism related jobs is a worst-case loss during construction activities over an assessed two-year period. This is set out in Table 16-10 in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**. During other phases of

ExQ	Respondent	Question	Applicant's Response
		Provide detail of how the support for diversification into sheep farming (referenced in ES Chapter 16 [APP-068] and [REP1-108]) would be advantageous to the local area, given the applicant does not propose to graze the land in the Order limits and 749.3ha of agricultural land would be removed from agricultural use for up to 60 years	the Scheme, the following loss of tourism related jobs is considered: a. Operation (long-term) – 11 FTE jobs (Table 16-13); b. Peak Replacement (1-2 years) – 16 FTE jobs (Table 16-14); and c. Decommissioning (2 years) – 40 FTE jobs (Table 16-16). 2) Losses to agriculture are based on an understanding from landowners involved in the Scheme, there are nine tenancies likely to be directly affected in the long-term by the Scheme. Owner-occupied landholdings have not been included as they are direct recipients of ground rent from the Scheme which is likely to go towards long-term financial stability for either maintaining or voluntarily closing their agricultural business. Agricultural businesses temporarily affected by works (such as temporary construction accesses, or cable works) have also not been included due to the temporary nature of effect, their reversibility, and compensation schemes available either

ExQ	Respondent	Question	Applicant's Response
			through voluntary agreements with the Applicant or compulsory acquisitioning powers. Based on the size of the nine tenancies included within the Scheme, the Applicant has estimated each would have approximately 1.5 full-time jobs which could be lost (therefore 13.5 FTE jobs directly lost). Based on ONS industry data for indirect effect multipliers for 2022, a further 1.5x multiplier applied for downstream or supply chain impacts. Therefore, the total estimated direct and indirect loss to agriculture was estimated at approximately 20 FTE jobs. Losses to tourism-dependent industries has been derived from the assessment of impacts to individual tourism and recreation assets in **ES Volume 3, Appendix 3: Tourism and Recreation Receptor Tables [APP-241]**. The magnitude of impact to these receptors in each super-output area within the 5 km Study Area have been considered against estimated employment in retail, accommodation, food and drink services, arts and cultural, and recreation and sports industries for the same area. The estimated employment is taken from

ExQ	Respondent	Question	Applicant's Response
			the Business Registry and Employment Survey for 2023 (the most recent data available pre-submission). A representative 'loss' of visitor spending, and thus on employment, has been applied based on the type of effect anticipated: i.e. impacts to PRoWs are likely to have an impact on visitor numbers, thus affecting all industries, while impacts to specific receptors (such as museums, or sports facilities) are more likely to have impacts that specifically affect that industry. This has been done for each assessed phase of the Scheme, hence why each phase has a separately assessed tourism related job loss. 3) Losses to agriculture have assessed direct and indirect impacts to the economy, based on ONS industry data for indirect effect multipliers being available to use. These do not consider induced (also known as Type II) effects. Type II effects have been assessed for agriculture in Scotland, Wales, and Northern Ireland by their respective national government statistics providers. These show a negligible additional induced effect from changes to agricultural employment and industry gross value added

ExQ	Respondent	Question	Applicant's Response
			when considering Type I (direct and indirect) versus Type II (direct, indirect and induced) effect: a. Scotland – Type I effect for output 1.5x, Type II effect for output 1.6x (Scottish Government, 2025, Supply, Use, Input-Output Tables and Multipliers for 2022); b. Wales – Type I effect for output 1.31x, Type II effect for output 1.37x (Stat Wales, 2025, Indicative economic multipliers (input-output tables) for 2019); and c. Scotland – Type I effect for output 1.61x, Type II effect for output 1.84x (Northern Ireland Statistics & Research Agency, 2026, Input-Output Analytical Tables and Multipliers 2022). As the ONS industry data for indirect effect multipliers for 2022 for England falls within this expected range, and additional induced effects are not likely to be substantially greater, the Applicant is confident that the use of a 1.5x multiplier (and thus a resultant loss of 20 FTE agriculture industry jobs) is a reasonable estimate based on the assessment assumptions used in **ES Volume 1, Chapter**

ExQ	Respondent	Question	Applicant's Response
			16: Socio-Economics, Tourism and Recreation [APP-068]. For tourism-related job losses, the anticipated loss of visitor spending is directly related to spending in local shops, food and drink establishments, accommodation providers, and for-profit recreation facilities. Given that this is a direct impact, the Applicant considers that the assessment in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068** fully assesses a worst-case impact on local industries that are reliant on visitor spending. 4) Paragraphs 3.5.29-3.5.30 in **ES Volume 1, Chapter 3: The Scheme [APP-055]** identify that for the purpose of assessing a worst-case scenario for the ES, no grazing has been assumed or relied upon for ES assessment or mitigation. This does not prevent grazing on the Solar PV Sites from occurring, with the option to do so would be at the discretion of landowners and farm operators who have the ability to manage a grazing flock. Indeed, the **Outline LEMP [APP-283]** identifies where on the Scheme grazing may be a suitable means

ExQ	Respondent	Question	Applicant's Response
			for controlling onsite vegetation. The **Outline Skills, Supple Chain and Employment Plan (SSCEP) [REP1-108]** demonstrates the Applicant's willingness to support sheep grazing as a farm diversification measure where there is the capability to do so. This therefore demonstrates that while the Scheme does remove 749.3 ha of arable land use during the construction, operation, and decommissioning of the Scheme, it does not necessarily mean that no agricultural use of the land can be undertaken alongside the operation of the Solar PV Sites.
SE1.3	The Applicant	**Socio-Economic and Tourism and Recreation Impacts** ES Chapter 16 [APP-068] sets a Study Area of 20km from the Order limits for the assessment of socio-economics, due to this equating to an approximate 30 minute commute time from the proposed development. Given the entire area for the proposed solar farm is agricultural land in the countryside, it is not clear to the ExA how a commute time is the appropriate methodology to determine the geographical extent of impacts on businesses from the	The Applicant has used a 20 km Study Area for economic impacts, primarily those likely to be directly generated by the Scheme by its construction, operation, and decommissioning. This is set out in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**. A 20 km, or roughly 30-minute commuting time has been deemed appropriate as an approximate area within which workers on the Scheme may live or be accommodated within and reasonably commute to the Scheme for work. Using a 20 km Study Area rather than

ExQ	Respondent	Question	Applicant's Response
		proposed development, which many IPs liken to the 'industrialisation' of the countryside. Wiltshire Council have similarly raised questions about why the Study Area is based on immediate area, instead of the wider County in its RR [RR-4934] and WR [REP1-137]. As a result, the applicant is asked to justify why it thinks a 30 minute commute time is the appropriate geographical measure.	relying on the administrative boundary of Wiltshire has been used given the Scheme's location near the county's border, and its accessibility via road to population centres within the likely 30-minute commuting distance. It is therefore more reasonable to assume that workers may travel from across the north and west of Wiltshire and its neighbouring council areas (Bath and North East Somerset, Cotswold, Somerset (former Mendip area), South Gloucestershire, Stroud and Swindon) rather than just from Wiltshire alone. This approach is based on professional judgement in the absence of standardised industry guidance and based on precedent from previous schemes undertaken by the Applicant. This therefore reflects the area within which direct economic benefits generated by the Scheme have been considered are most likely to be felt. Similarly, this is a reasonable area for indirect economic benefits, such as from supply chains and suppliers to be located within as it is assumed that proximity to the

ExQ	Respondent	Question	Applicant's Response
			Scheme would make their ability to act as supporting industries during construction, operation, and decommissioning more viable than if located more than 30-minutes travel away. Given the workforce for the Scheme is likely to live or be accommodated within 20 km / a 30-minute journey of the Scheme, this also approximately represents the area that induced effects, from increased personal spending by direct employees of the Scheme (and those indirectly supported by the Scheme) would be most likely to occur. Direct and indirect impacts to agriculture from the Scheme are anticipated to be in the area most immediately surrounding the Solar PV Sites. This is understood within the assessment in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**, which uses the same 20 km Study Area for economics to provide a comparable area to that expected for economic benefits, so that impacts to agriculture can be readily contextualised. The same principle has been used for tourism industry impacts, with the assessment in **ES Chapter 16 [APP-068]**

<table>
<tr><th>ExQ</th><th>Respondent</th><th>Question</th><th>Applicant's Response</th></tr>
<tr><td></td><td></td><td></td><td>understanding that impacts are likely to felt in the immediate surroundings of the Scheme, hence the use of specific 2 km and 5 km Study Areas for tourism and recreation impacts, which have specifically been reported in ES Volume 3, Appendix 16-1: Socio-Economics, Tourism and Recreation: Legislation, Policy, Guidance, and Supporting Information [APP-240]. Again, a comparative use of the 20 km Study Area has been used to contextualise these impacts against the economic benefits of the Scheme.

As part of the Applicant's Response to Relevant Representations (Part 1) [PDA-009], the Applicant has provided its estimates for agricultural and tourism industry impacts to economic value and employment within Wiltshire.

<table>
<tr><td></td><td>Agriculture (all phases)</td><td>Tourism (maximum impact during construction)</td></tr>
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<tr><th>ExQ</th><th>Respondent</th><th>Question</th><th>Applicant's Response</th></tr>
<tr><td></td><td></td><td></td><td>
<table>
<tr><td>Impacts from the Scheme</td><td>~20 FTE jobs

~£628,000 GVA per annum</td><td>~50 FTE jobs

~£1.76 million GVA per annum</td></tr>
<tr><td>Impact within 20 km Study Area</td><td>0.08%</td><td>0.08%</td></tr>
<tr><td>Impact within Wiltshire</td><td>0.29% employment

0.31% GVA</td><td>0.17% employment

0.15% GVA</td></tr>
<tr><td>Impact within 5 km Study Area</td><td>BRES data for small areas unavailable for employment in farming agriculture</td><td>0.68%</td></tr>
</table>
The Applicant is confident that these demonstrate that even when considered against a smaller area than the 20 km Study Area for economics, the impacts to the agricultural and tourism industries from the Scheme are not significant adverse effects.
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ExQ	Respondent	Question	Applicant's Response
SE1.4	The Applicant	**Outline Skills Supply Chain and Employment Plan Q1** Paragraph 5.2.3 of the outline Skills Supply Chain and Employment Plan (oSSCEP) [REP1-108] states the applicant will seek *'to offer apprenticeships and other academic support during the construction* ***or*** *operational phase of the Scheme'.* Please confirm if this should read '**and**', as opposed to '**or**'. If that is not the case, please detail why. Would opportunities also be explored during decommissioning? If not, please explain.	The Applicant confirms this is a typographical error and has corrected this in the updated **Outline SSCEP [EN010168/APP/7.20]** (Revision 3) submitted at Deadline 3. The Applicant has furthermore reviewed and, where suitable, amended the wording of the **Outline SSCEP [EN010168/APP/7.20]** (Revision 3) to more explicitly set out the phases of the Scheme to which the **Outline SSCEP [EN010168/APP/7.20]** (Revision 3) refers. Opportunities to explore skills, apprenticeships and other academic and employment support during decommissioning are supported by the Applicant and in principle will follow those during construction. Provision of details of these measures at the point of decommissioning is however secured for the decommissioning stage through the **Outline Decommissioning Statement [REP1-100]** through Requirement 20 of Schedule 2 to the **Draft DCO [REP1-007]**, with those details to be detailed in alignment with the principles of the measures secured through the **Outline SSCEP [EN010168/APP/7.20]** (Revision 3). This has been done so that measures to

ExQ	Respondent	Question	Applicant's Response
			support skills and employment during decommissioning are based on up-to-date practices at the point of decommissioning occurring.
SE1.5	The Applicant	**Outline Skills Supply Chain and Employment Plan Q2** Paragraph 5.2.4 of the oSSCEP [REP1-108] states it will *'consider a programme to promote apprenticeships during the various phases of the Scheme*.' Furthermore, paragraph 5.3.5 states *'Once construction commences it may be helpful to display or advertise for vacancies in suitable physical locations or media within the 20 km Study Area. Alternatively, a named Skills and Employment Manager for the Scheme would be made responsible for filling vacancies by reaching out to local contacts*.' Overall, the language in this document is vague, as per the highlighted examples, and does not appear to commit the applicant to undertake any form of apprenticeship scheme or promote vacancies locally throughout the entirety of the proposed development.	The Applicant has reviewed and where relevant has provided greater clarity to the commitments made in the **Outline SSCEP [EN010168/APP/7.20]** (Revision 3) to promote apprenticeships, skills, and local employment, and the amount of certainty that can be applied to them. The Applicant has added example references to specific stakeholders for education and employment to more explicitly demonstrate the types of institutions and professional bodies expected to be engaged with to deliver the objectives of the **Outline SSCEP [EN010168/APP/7.20]** (Revision 3). These have been provided in the updated **Outline SSCEP [EN010168/APP/7.20]** (Revision 3) submitted at Deadline 3. The Applicant acknowledges that the language in the **Outline SSCEP [EN010168/APP/7.20]** (Revision 3) is purposely unrestrictive to allow for the greatest level of optionality to be pursued with respect to skills, education and

ExQ	Respondent	Question	Applicant's Response
		Elsewhere, section 6.3 'Plan Delivery' does not name any educational institutions in the list of stakeholders. Given you expect to provide skills training, including apprenticeships, please explain the reasoning behind this approach. Please review this document and provide comment on those issues listed above.	local employment at each phase of development on the Scheme. The intention behind this is to ensure that the relevant local authority or authorities, and key stakeholders, have greater opportunity to inform and direct commitments through the production of the detailed SSCEP, pursuant to Requirement 18 of Schedule 2 to the **Draft DCO [REP1-007]**. This has been done to ensure that any committed apprenticeship, skills training, or employment support offered by the Scheme directly contribute to current, emerging, and future local skills, education and economic strategy, and are directly supported by local providers.
SE1.6	The Applicant	**Outline Skills Supply Chain and Employment Plan Q3** Paragraph 5.4.8 of the oSSCEP [REP1-108] states '*All international suppliers will be held to a minimum quality with regard to environmental, professional and ethical working practices (including but not limited to the banning of suppliers or manufacturers that*	The Applicant has reviewed and where relevant updated the commitments made in the updated **Outline SSCEP [EN010168/APP/7.20 (Rev 3)]** submitted at Deadline 3. Paragraphs 7.3.1 and 7.3.2 of the **Outline SSCEP [EN010168/APP/7.20 (Rev 3)]** which explains that Island Green Power is a signatory of the UK Industry Supply Chain Statement which shows commitment to

ExQ	Respondent	Question	Applicant's Response
		engage in slavery or forced labour) as agreed by the members of Solar Energy UK'. You are asked to provide detail as to how this is enforced.	ensuring safeguarding throughout its global supply chain. Furthermore, the Applicant confirms that a risk-based approach is applied to supply chain due-diligence, meaning that deeper scrutiny is applied where any risk is higher. All suppliers first undergo restricted party and adverse media screening to evaluate sanctions, money laundering, legal compliance, and ESG risks at the fundamental level. Our supplier onboarding process includes supplier self-assessment questionnaires which is a self-reporting tool to assess a supplier's capacity to manage ESG and EHS risks, including modern slavery risks in its operations and supply chain. Where risks are identified we will seek assurances that the supplier has suitable policies, processes, and procedures in place to manage the risk or introduce contractual mitigation. Due diligence is supported by the ESG and Compliance team and our EHS specialist. Enhanced due diligence will apply to high-risk suppliers particularly the principal contractors,

ExQ	Respondent	Question	Applicant's Response
			O&M contractors, and key equipment suppliers. This may include interviews, in addition to desk reviews, or external auditing and verification. Our approach is aligned with OECD Due Diligence Guidance for Responsible Businesses Conduct and ensures that elevated risks are addressed through more stringent controls, including more frequent monitoring and stronger contractual provisions. Given the heightened human rights and modern slavery risks associated with solar PV modules, BESS and their supply chains, IGP has been supported by our investor to benchmark and align our processes with legal requirements and industry best practices, in preparation for solar module and BESS procurement at project level. This includes independent ESG due diligence, traceability assessments and on-site audits with defined contractual controls, escalation protocols and incident and breach management requirements. Similarly, where cyber security risks are higher, suppliers are subject to external specialist cyber-security assessments to ensure their compliance. Due diligence is refreshed at regular intervals, with at least

ExQ	Respondent	Question	Applicant's Response
			annual re-certification of key compliance evidence. Finally, our Counterparty Code of Conduct, and our minimum Environmental, Health and Safety Rules set the minimum expectations for conduct of our suppliers and are embedded in the supplier contracts. These set the environmental, professional, and ethical standards for the direct suppliers and their supply chain.
SE1.7	The Applicant	**Public Rights of Way Network Temporary Diversions** ES Chapter 16 [APP-068] states that PRoWs WT|GRIT|20 and WT|MALW|54 both require temporary diversions during construction and decommissioning. Please advise how long the diversions would need to be in place and the length of the diversion route provided, as this is not explained in the outline Public Right of Way and Permissive Paths Management Plan [REP1-104].	The details of diversions to PROW have not yet been established and will come as a result of detailed design and once a detailed construction project programme has been produced. That notwithstanding, the below response sets out the reasoning for the required diversions being applied for, and a description of the indicative route these may follow. This is supported by the appended Figures 1-1 and 1-2 which show the indicative diversion route as described. The **Outline PROWPPMP [REP1-104]** explains at paragraph 3.2.2 that PRoW GRIT|20 and MALW54 will be temporarily

ExQ	Respondent	Question	Applicant's Response
			diverted for the duration of the construction phase. The proposed temporary diversion to footpath WT|GRIT|20 is applied for due to the location of a site construction compound to be used for the construction (and decommissioning) of the Grid Connection Cable. As such, the duration of the diversion in this location is estimated to be up to 18 months, based on the estimated construction time for the Cable Route Corridor as assessed in **ES Volume 1, Chapter 3: The Scheme [APP-055]**. The duration of closures applied for is 24 months (the full construction and decommissioning periods) to allow for any delays or need to split or phase works. This duration may be reduced if works utilising the compound in this location are completed in a shorter time. The Applicant is committed to ensuring that the diversion at this location is only in place for the duration that is necessary, and the route restored as soon as practicable after construction and decommissioning works are completed. The length of this diversion, taken around the north and east of the proposed construction compound is

ExQ	Respondent	Question	Applicant's Response
			approximately 580 m, an increase of ~270 m (3-5 minutes' walking time) from the original route of footpath WT|GRIT|20. The proposed temporary diversion to bridleway WT|MALW|54 and footpath WT|MALW|55 is applied for due to the location of an access track to be used for the construction (and decommissioning) of the Solar PV Array and 132 kV substation at Lime Down E. The duration of closures applied for is 24 months (the full construction and decommissioning periods) to allow for any delays or need to split or phase works. The anticipated closure time, based on the estimated construction duration for Lime Down E as assessed in **ES Volume 1, Chapter 3: The Scheme [APP-055]**, is 14 months. The Applicant is committed to ensuring that the diversion at this location is only in place for the duration that is necessary, and the route restored as soon as practicable after construction and decommissioning works are completed. The length of this diversion, parallel and to the west of the access track, is approximately 810 m, an increase of ~35m (less than 1 minute's walking time) from the

ExQ	Respondent	Question	Applicant's Response
			original route of bridleway WT|MALW|54. A specific crossing point for users of footpath WT|MALW|55 would also be provided to ensure continued connection to the diverted route of WTMALW|54 during the construction and decommissioning phases. Subject to detailed design of the alignment of the construction access route may require diversion of footpath WT|MALW|60 to separate construction HGV movements from PROW users.
SE1.8	The Applicant	**Public Rights of Way Network Post Decommissioning** The Wiltshire Ramblers [RR-4935] requested confirmation of the status of the PRoW network post-decommissioning and whether the network would return to its pre-construction layout. Please confirm the status of the PRoW network following decommissioning. Should the position be anything other than the current pre-construction network please provide a map showing the future layout with an explanation.	The Applicant has responded to the Relevant Representation made by the Wiltshire Ramblers **[RR-4935]** at Section 4.22 of **The Applicant's Response to Relevant Representation (Part 1) [PDA-009]**. Therein, the Applicant has set out its commitment to maintaining the PRoW network on the Solar PV Array sites through the measures secured by the **Outline PROWPPMP [REP1-104]** by Requirement 16 in Schedule 2 to the **Draft DCO [REP1-007]**. The Applicant confirms that the pre-construction routing of all PRoWs affected by

ExQ	Respondent	Question	Applicant's Response
			the Order Limits are to be maintained throughout the operational lifetime of the Scheme. Temporary diversions to PRoWs will only be undertaken during the construction phase, decommissioning phase, and if required during site maintenance and replacement works. For each stage, any temporary alterations to alignment and surface conditions must be restored to their pre-works location and condition. This is secured by the **Outline PRoWPPMP [REP1-104]** by Requirement 16 in Schedule 2 to the **Draft DCO [REP1-007]**. The same document also commits the Applicant to be responsible for maintaining PRoW with respect to keeping passage clear from obstruction and vegetation, maintaining waymarking and warning signage, and access furniture such as gates and bridges. Post-decommissioning, the PRoW network would therefore be the same alignment and layout as pre-construction, and as maintained throughout the operational phase of the Scheme. Responsibility for keeping PRoWs in good useable condition

ExQ	Respondent	Question	Applicant's Response
			would then be transferred back to the respective landowner. Additions or improvements to the PRoW network agreed by Wiltshire Council and the respective landowners may be implemented during the Scheme's operation if undertaken through allocated funding within the Community Benefit Fund to PROW network improvements. This is however separate from the DCO process and is not due to be implemented directly by the Applicant.
SE1.9	The Applicant	**Equine Health** Concerns have been raised that the applicant has not undertaken a proper assessment of impacts and effects on equine health and businesses. ES Chapter 16 [APP-068] states that such businesses are of '*local importance and therefore low sensitivity*', however IPs have suggested this underplays the economic importance of stud farms in the vicinity on the wider economy. For example, [REP1-158, REP1-202 and REP1-214] have provided evidence that equine health can be adversely impacted by noise and construction activities,	1) The Applicant is confident that the assessment undertaken in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**, as supported by **ES Volume 3: Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]** has sufficiently assessed impacts to equestrian facilities based on the scope of assessment agreed in the Scoping Opinion adopted by the Secretary of State on 22 August 2024, which raised no comments on the proposed assessment of equestrian facilities.

ExQ	Respondent	Question	Applicant's Response
		whilst further concern has been raised about the sensitivities that horses experience when encountering electromagnetic fields. [REP1-191] further details the potential adverse effects on this IP's stud business arising from construction and maintenance activities. Given the unpredictable nature of horses and the impact that this could have on the safety and welfare of both horses and riders/handlers, you are asked to provide justification for considering these to be standard recreation receptors. Given the number of equine related representations, you are also requested to provide a more detailed assessment of the impacts on job losses in and business viability of the equine sector (and its supporting industries) beyond the information presented in Table 2-10 of ES Appendix 16-2 [APP-241]. When providing your response you are asked to consider the specific concerns from the above noted submissions focusing on evidence relating to equine health.	Furthermore, the Applicant seeks to reaffirm that **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** states that "*Private facilities are considered to be of local importance and therefore low sensitivity, whilst riding schools, liveries and studs, or equine care businesses are considered to be of medium sensitivity due to their prevalence and combined recreational and economic importance within the local area*". This distinction has been applied consistently across the identified receptors in Table 2-10 and 3-10 in **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptors [APP-241]**. The assessment of impacts to these facilities considers visual impacts, construction and operation impacts on horses, and any impacts to PROWs and highways surrounding the facilities most likely to be used as hacking routes. These considerations were therefore used to determine the magnitude of impacts to each facility scoped into assessment in Table 3-10 in **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptors [APP-**

ExQ	Respondent	Question	Applicant's Response
		You are also asked to submit a map showing the location of equestrian facilities with a commentary of the name, address and business activities. This should be split between stud farms, stabling/livery yards and details of any other equine facility type within the 20km study area.	**241]**. An approximation of likely economic effects derived from these was based on publicly available employment and economic value (GVA) for the horse rearing and racehorse/sporting industries and therefore did not consider the economic performance of individual businesses. This approach was also consistent with effects to other sports and recreation facilities, and tourism-or visitor-dependent industries. 2) The Applicant is undertaking an assessment to cover impacts to equine health and on equestrian businesses closely affected by the Scheme. For the purpose of ensuring the report is sufficiently detailed and proportionate, the Applicant proposes to scope this assessment to equestrian businesses within 2 km of the Scheme or otherwise as identified in **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptors [APP-241]** as likely to experience effects from the construction and operation of the Scheme. 3) The Applicant proposes to include the requested map and list of equestrian facilities and supporting services within 20 km as part of

ExQ	Respondent	Question	Applicant's Response
			this assessment, as part of its assessment of wider indirect, service and supply chain impacts. Due to the scope of assessment and information gathering requested for parts 2) and 3), and the need to gather information directly from affected equestrian facilities to guide an economic assessment of impacts, this report is due to be prepared for submission at Deadline 4.
SE1.10	Wiltshire Council	**Innovation Forum** In your D2 submission [REP2-048] you make reference to a possible Innovation Forum which could help the proposed development 'evolve with new innovations and best practice' over its lifetime. You are asked to provide further detail, specifically the following and anything more you think would be helpful to the ExA: Who would make up the Innovation Forum What powers would have the Innovation Forum have	The Applicant awaits Wiltshire Council's response to this question to clarify whether the Council is referring to a forum jointly hosted by the Applicant and Council, one or the other, or to the existing Innovation Forum network (see innovationforum.co.uk). The Applicant would consider participation or joining such a forum if the Applicant were invited to join, noting that within Island Green Powers employment are members of Solar Energy UK and the NSIP Forum. The Applicant is already committed to ensuring the design of the Scheme is adaptive and resilient to climate change and new

ExQ	Respondent	Question	Applicant's Response
		Would the Innovation Forum form part of the Community Liaison Forum Examples of where an Innovation Forum has been used elsewhere	technologies can be introduced onto the Scheme where they would help to better deliver environmental and economic outcomes from the Scheme. This is set out in the **Design Approach Document [APP-268]**. The Applicant can therefore well understand the potential environmental (and economic) benefits of ensuring new innovations and best practices for matters such as solar and energy storage technology, waste, materials use, and recycling can be brought into the Scheme during its lifetime. The Applicant can also discuss this matter further through the Statement of Common Ground during the DCO examination process.

2.18 Transportation, Traffic and Highway Safety

ExQ	Respondent	Question	Applicant's Response
TT1.1	The Applicant	**ES Appendix 13.1** ES Appendix 13.1 (Transport Assessment) was split into two parts at D1 [REP1-057 (Part 1) and REP1-059 (Part 2)]. Part 1 of the document contains 801 pages, and Part 2 contains 183 pages. However, the page numbers for the annexes in the contents page do not reflect the number of inserted pages within each annex, making it difficult to locate the starting page for each annex within the document. Annex C for example, is listed as page 80 on the contents page of Part 1, yet it is actually located at page 46 of Part 2. Similarly, Annex K is listed as page 88 on the contents page of Part 1, yet it is located at PDF page 173 of Part 2. The page numbering in the contents page should therefore be revisited to take account of the number of insertions within each annex, both parts of Appendix 13-1 should contain a contents page and not just Part 1, and the Annex page number locations within the contents pages should be hyperlinked so that	The Applicant notes the errors identified by the Examining Authority in **ES Volume 3, Appendix 13-1: Transport Assessment [REP1-057 and REP1-058]** submitted at Deadline 1 of Examination. The Applicant has submitted an updated version of **ES Volume 3, Appendix 13-1: Transport Assessment [EN010168/APP/6.3 (Rev 3)]** at Deadline 3 of Examination. This has been submitted as a single document, rather than split into two parts, and corrects the page numbering and table of contents hyperlinks.

ExQ	Respondent	Question	Applicant's Response
		the start of each Annex can be easily located in one click. The ExA requests the submission of renumbered replacement documents and fully functioning hyperlinked contents pages at D3.	
TT1.2	The Applicant	**Outline Construction Traffic Management Plan Omissions (oCTMP)** The oCTMP was updated at D1 [REP1-112], however, the figures at page numbers 41 and 42 in the contents page (Appendix A (Access Drawings – Solar PV Sites) and Appendix B (Cable Route Corridor)) are missing from the document. Likewise, Annexes A to F listed as pages 73 to 78 in the contents page, are also missing from the document. As per the issues locating the annexes in ES Appendix 13.1 (referred to in ExQ1 TT1.1 above), the page numbering in the contents page of the next revision of the oCTMP, which reinstates the missing Appendices and Annexes, should also be revisited to take account of the number of figures within each Appendix and the number of insertions within each annex. The contents page numbers	The Applicant notes that Appendix A, Appendix B, and Annexes A to F were missing from the **Outline CTMP [REP1-112]** submitted at Deadline 1 of Examination. The Applicant has submitted an updated version of the **Outline CTMP [EN010168/APP/7.22 (Rev 3)]** at Deadline 3 of Examination. This corrects the page numbering and table of contents hyperlinks and includes the missing appendices and annexes.

ExQ	Respondent	Question	Applicant's Response
		should also fully hyperlinked to allow the figures and annexes to be located in one click.	
TT1.3	The Applicant	**Highway Improvement Areas Q1** As part of its pre-application consultation response, Wiltshire Council Highways requested that proposed works to be undertaken in the Highway Improvement Areas (HIAs) should be clearly set out in the application material. The ExA note reference in section 1.7.14 of ES Appendix 13-1 [REP1-057] (Part 1) to the creation of junction widening, removal of things like bollards and signs, and trimming of hedges in the HIA locations listed in that section of the document, but the only figure showing any detail is Annex I of ES Appendix 13-1 [REP1-059] (Part 2) on PDF page 166, which shows 'Alderton Road Widening Areas for Two Passing Articulated 16.5m HGVs'. That figure also lacks any detail with regard to what works are required to facilitate the widening in the places shown, such as removal of hedgerows, dry-stone wall, verge, and so on, and whether the works would be temporary or permanent.	The Applicant makes note of this comment. The Applicant has submitted an updated version of **ES Volume 2, Figure 2-4-1 to 2-4-9: Public Right of Way and Highways [EN010168/APP/6.2 (Rev 2)]**, **ES Volume 2, Figure 3-1 to 3-1-5: Indicative Site Layout Plan [EN010168/APP/6.2 (Rev 2)]**, and **ES Volume 2, Figure 3-2: Key Construction Phase Features [EN010168/APP/6.2 (Rev 2)]**. These now differentiate between HIA which are temporary and permanent in different colours. As requested, the Applicant will provide the following at Deadline 4: a. Update ES Chapter 13, ES Appendix 13-1 and the Outline CTMP with a new Table in each document, which allocates a number and a geographical description to each of the temporary and permanent HIAs (in the same way the applicant has done for each of the site access points in Table 13-19 of ES Chapter 13), and provide a detailed

ExQ	Respondent	Question	Applicant's Response
		The Applicant's oCTMP [REP1-112] provides some additional descriptive detail of temporary highway improvement measures in section 5.4, while paragraph 4.6.2 of that document states '*Where the construction routes pass through sections of road that are considered narrow and require widening or require surfacing works, these have been adopted into the design as 'Highway Improvement Areas'*. Despite this information, none of these works are shown in any detail on any plan or figure within the application material and it remains unknown whether such works can be achieved. The ExA considers that there is inadequate descriptive and illustrated detail of the highway improvement works (particularly the areas that require widening) that would take place in each of the HIAs. The ExA requires the Applicant to: Update ES Chapter 13, ES Appendix 13-1 and the oCTMP with a new Table in each document, which allocates a number and a geographical description to each of the temporary and permanent HIAs (in the same way the applicant	schedule of HIA works intended for each of those numbered HIA areas; and b. Provide a dedicated set of HIA drawings for each temporary and permanent HIA, illustrating the works required (installation and removal) at each location, or explain why this is not possible.

ExQ	Respondent	Question	Applicant's Response
		has done for each of the site access points in Table 13-19 of ES Chapter 13), and provide a detailed schedule of HIA works intended for each of those numbered HIA areas; and Provide a dedicated set of HIA drawings for each temporary and permanent HIA, illustrating the works required (installation and removal) at each location, or explain why this is not possible. The ExA appreciates the time it may take to produce these drawings, so while deadline 3 is the preferred submission date, they should be submitted no later than deadline 4.	
TT1.4	The Applicant	**Highway Improvement Areas Q2** The HIAs are seemingly included in Work Nos. 8A (temporary) and 8B (permanent) of the dDCO and shown in the work plans [APP-007] in different colour/hatching. However, the distinction between temporary and permanent HIAs is not shown in ES Figures 2-4-1 to 2-4-9 [APP-080], 3-1 to 3-1-5 [APP-081] and 3-2 to 3-2-10 [APP-082]. These figures should therefore be amended to delineate temporary and permanent HIA locations in different colours.	The Applicant has submitted an updated version of **ES Volume 2, Figure 2-4-1 to 2-4-9: Public Right of Way and Highways [EN010168/APP/6.2 (Rev 2)]**, **ES Volume 2, Figure 3-1 to 3-1-5: Indicative Site Layout Plan [EN010168/APP/6.2 (Rev 2)]**, and **ES Volume 2, Figure 3-2: Key Construction Phase Features [EN010168/APP/6.2 (Rev 2)]**. These now differentiate between HIA which are temporary and permanent in different colours.

ExQ	Respondent	Question	Applicant's Response
		However, please note that the light pink colour used to identify the HIA areas in ES Figures 2-4-1 to 2-4-9 is too similar to the colour used to delineate B Roads so this requires revision to ensure that the distinction is clear to the viewer.	The colour used to present HIA in **ES Volume 2, Figure 2-4-1 to 2-4-9: Public Right of Way and Highways [EN010168/APP/6.2 (Rev 2)]** has also been updated to avoid any confusion with that used for B roads.
TT1.5	The Applicant	**Construction Access Points** Paragraph 2.1.2 of the oCTMP [REP1-112] states that the 21 accesses required for the solar PV sites would be retained for use by maintenance vehicles once the development is operational. The oCTMP does not include any statement about the retention or otherwise of the accesses into the CRC. Whilst it is acknowledged that the vast majority of access points along the CRC would be existing access points, some new access points are proposed and some of the existing accesses are likely to necessitate widening and formalisation for construction purposes. The ExA is seeking to understand: Which new accesses created for construction along the CRC corridor would be closed post	The Applicant makes note of this comment. The updated **Outline CTMP [EN010168/APP/7.22]** (Revision 3) has been updated to clarify the following: All new accesses created for construction along the CRC corridor would be closed post construction and the land/ boundary reinstated to its pre-construction state unless agreed otherwise with the landowners or Local Authority. Any maintenance would be undertaken via existing field entrances. All existing accesses on the CRC would be reinstated to their pre-altered state/ size unless agreed otherwise with the landowners or Local Authority. All existing accesses to the Solar PV sites would be retained in their altered state/size.

ExQ	Respondent	Question	Applicant's Response
		construction and the land/ boundary reinstated to its pre-construction state. Which existing accesses (for the solar PV sites and CRC corridor) would be retained in their altered state/ size or reinstated to their pre-altered state/ size. For any new or altered access which is proposed to be reinstated to its pre-altered state/ size, where this requirement is secured.	The requirement for any new or altered access which is proposed to be reinstated to pre-altered state/ size will be secured through the **Outline CTMP [EN010168/APP/7.22]** (Revision 3).
TT1.6	The Applicant	**Traffic Forecasting** Section 13.4 of ES Chapter 13 [REP1-019] states that construction traffic forecasts have been developed based on professional judgement and derived from experience with other developments similar in size, scale and nature to the scheme. The applicant is asked to explain which other schemes informed this assessment, which of those other schemes have been completed, and which of those other completed schemes have had their actual traffic forecasting monitored and verified for accuracy?	The trip generation figures within the analysis were derived from a detailed breakdown of construction activities provided by a contractor based on the draft layouts designs given to them by the Applicant's engineers. The assessment is based on the resultant quantities, and these can be seen in the submission in Annex E of **ES Volume 3 Appendix 1-3 Transport Assessment Rev 2 [REP 1-057] and [REP 1-059]**. The Applicant's transport consultants have worked on over 200 solar sites supporting them through planning to completion and draws on this experience when assessing the sites.

ExQ	Respondent	Question	Applicant's Response
		In addition, ES Chapter 13 also states that operation and maintenance phase traffic forecasts have again been developed based on similar projects. The applicant is asked to explain which other projects are similar to the Lime Down Proposal and whether they are operational. The ExA is concerned that the forecasting may be based on other projects which are not yet constructed or operational such that the accuracy of the forecasting of those other projects cannot be verified. In that regard, how can the ExA be assured that the figures underpinning the applicant's Transport Assessment are realistic?	It is noted that formal post-construction traffic monitoring of operational solar farms is not commonly undertaken, due to the very low level of vehicle movements associated with their operation. However, industry experience demonstrate that operational traffic levels are negligible and typically limited to occasional maintenance visits. This assumption is widely accepted by local planning and highway authorities in previous solar farm applications. In practice, operational solar farms are unmanned, remotely monitored, and visited only intermittently, meaning that actual vehicle movements are often low. If the figures in the final CTMP are greater than those assessed when it comes to be implemented, further assessment would be required to demonstrate the traffic volumes remain not significant. From the Applicant's research, there are approximately 14 permitted DCO Solar farms in the UK. They include:

ExQ	Respondent	Question	Applicant's Response
			a. Cleve Hill Solar Park – Kent – 373MW (DCO granted May 2020) b. Little Crow Solar Park – North Lincolnshire – 150MW (DCO granted April 2022) c. Sunnica Energy Farm – Cambridgeshire and Suffolk – 500MW (DCO granted July 2024) d. Mallard Pass Solar Farm – Lincolnshire and Rutland – 240MW (DCO granted July 2024) e. Gate Burton Energy Park – Lincolnshire – 500MW (DCO granted July 2024) f. Cottam Solar Project – Nottinghamshire and Lincolnshire – 600MW (DCO granted September 2024) g. Heckington Fen Solar Park – Lincolnshire – 500MW (DCO granted January 2025) h. West Burton Solar Project – Lincolnshire – 480MW (DCO granted January 2025) i. Oaklands Farm Solar Park – South Derbyshire – 152.4MW (DCO granted June 2025) j. Helios Solar Park – North Yorkshire – 190MW (DCO granted December 2025) k. Springwell Solar Farm – Northumberland – 800MW (DCO granted April 2026)

ExQ	Respondent	Question	Applicant's Response
			l. East Yorkshire Solar Farm – East Yorkshire - 400MW (DCO granted May 2025) m. Byers Gill Solar – County Durham – 180MW (DCO granted July 2025) n. Tillbridge Solar Farm – Lincolnshire – 500MW (DCO granted October 2025) Only one (Cleve Hill) is built and operational and the Applicant has not had sight of any survey data for that. However, Paragraph 2.7.1 of the Construction Traffic Management Plan [TPLO/66705] prepared to discharge Requirement 12 of the Cleve Hill Solar Park Development Consent Order states: *"The daily peak volumes of construction vehicles set out within the Outline CTMP and assessed as part of the DCO will not be exceeded."*
TT1.7	The Applicant The Local Highway Authority (LHA)	**Construction Worker Numbers** Paragraph 3.2.7 of the oCTMP [REP1-112] states that *'on a peak day, assuming the build out of all areas/elements of the scheme concurrently, there is expected to be a peak of*	Vehicle traffic on highway networks and at hotspots are commonly assessed for peak hours (08:00-09:00 and 17:00-18:00). This is because these are peak commuting times, and

ExQ	Respondent	Question	Applicant's Response
		622 workers spread across the solar PV sites. For assessment, construction workers have been spread across the solar PV sites on a proportional basis, based on the size of each area.' Table 1 of the oCTMP provides an indicative construction programme, which shows Lime Down A, B and D all starting construction at the same time but Lime Down A and B finishing after 9 months. Lime Down C and E would commence around the 8-9 month mark and would be built alongside the rest of Lime Down D. Given that workers to each of these sites would not be compelled to use the company shuttle buses (or car share) and given the different build out periods, the ExA is concerned that spreading out the assessment impact of workers on a proportional basis (and on the assumption that 50% would use shuttle buses and each car would accommodate 1.5 construction workers) is not cautious enough to capture local traffic hotspots at the worst case, and when in the construction period those worst case impacts are likely to occur. The ExA therefore requires the applicant to provide a detailed rationale for their chosen methodology.	times when the highway network is at its most sensitive. However, in accordance with the **Outline CTMP [REP1-112]** and the Construction Worker Travel Plan, shifts will be organised to avoid construction worker movements between 08:00-09:00 and 17:00-18:00 and arrivals and departures will be spread over more than a single hour. Therefore, the increase in vehicle numbers is unlikely to result in material delays. The site is located within a predominantly rural area where baseline traffic flows on the surrounding highway network are relatively low, and roads generally operate well within capacity. The avoidance of peak period travel ensures that construction worker movements do not contribute to congestion, increased delay, or materially impact junction capacity. The impact is also temporary. Construction worker information was based on information provided by a contractor. The Applicant took the peak number of construction workers (622) over the entire draft construction

ExQ	Respondent	Question	Applicant's Response
		The ExA also welcomes any comment from the LHA on the appropriateness of the applicant's chosen methodology.	programme and distributed it proportionally across the solar PV sites. A check was then made comparing the peaks on each construction route against the distributed 622 figure, finding that these peaks were lower. Accordingly, the proportional distribution of 622 workers was assessed as it provided a more robust worst-case for assessment. The draft programme is subject to change and will be set out in the final CTMP. The applicant therefore used these figures as AADTs in the assessment. This approach was used to provide a worst-case assessment against the methodology used for the ES assessment presented in **ES Volume 1, Chapter 13: Transport and Access [REP1-019]**. The use of shuttle buses by construction workers can be secured through the detailed CTMP and associated Construction Worker Travel Plan each of which would be Requirements of the DCO. The final CTMP will include details on incentives for use of shuttle bus and car sharing. As set out in the **Outline CTMP [EN010168/APP/7.22]** (Revision 3), it is likely

ExQ	Respondent	Question	Applicant's Response
			that the majority of construction workers would be non-local and would be housed together in nearby accommodation and transported to site by minibus. The usage of the minibus can be monitored through the keeping of a logbook, which would be kept in the site management office and made available to the local authority for inspection at any time.
TT1.8	The Applicant	**Construction Shuttle Buses** The ExA note the applicant's commitment in the oCTMP [REP1-112] to construction worker shuttle buses to minimise traffic during construction, and that it would monitor the uptake of this travel plan measure. The ExA also notes that the applicant assumes that 50% of workers would use shuttle buses and that this is based on a figure used in the Cottam Solar and West Burton Solar Projects. However, the ExA understands that neither of those consented projects have yet to be constructed, so as asked in ExQ1 TT 1.6 (above), how can the ExA be assured that the figures underpinning the applicant's Transport Assessment are realistic?	The use of shuttle buses by construction workers can be secured through the detailed CTMP and associated Construction Worker Travel Plan each of which would be Requirements of the DCO. A shuttle bus mode share of up to 50% for construction workers has been adopted within the assessment. The site is located within a rural area with limited public transport accessibility, meaning that travel to the construction compounds would otherwise be heavily reliant on private car use. To manage this, a dedicated shuttle bus service will be implemented, with pick-up locations established in nearby settlements

ExQ	Respondent	Question	Applicant's Response
		In addition, the ExA note a lack of a clear performance measure attached to the shuttle bus commitment in the oCTMP and wishes to understand how the applicant intends to deal with low shuttle bus uptake if it arises?	where the workforce is most likely to be accommodated. Construction worker travel patterns are typically highly regular, with fixed start and finish times and limited flexibility. A shuttle bus provides these workers with reduce fuel and travel costs and removes the need to navigate rural routes. This makes the workforce particularly suited to organised transport solutions, allowing shuttle services to operate efficiently and align closely with demand. The final CTMP will include details on incentives for use of shuttle bus and car sharing. On-site parking will be controlled and limited, with priority given to essential operational and delivery vehicles. The shuttle bus strategy will be secured through the final CTMP, ensuring implementation, monitoring, and adjustment as necessary. The combination of restricted parking, managed transport provision, and rural

ExQ	Respondent	Question	Applicant's Response
			site characteristics provides a strong basis for achieving a shuttle mode share of 50%.
TT1.9	The Applicant	**Abnormal Indivisible Loads (AIL)** There would be approximately 132 AIL movements associated with cable drum deliveries over the length of the CRC, up to 10 AIL movements associated with cable delivery within the solar PV sites, and approximately 13 AIL movements associated with transformers to the 132kV substations located in Lime Down A, C, D and E. Are these AIL figures included in the HGV calculations in Tables 13-20, 13-25 and 13-35 of ES Chapter 13 [REP1-019], and are these specific loads also considered in the assessment of effects on fear and intimidation of non-motorised user (NMU) and road users, and accidents and safety? The applicant is asked to direct the ExA to where these specific matters relating to AIL have been discussed in the application material.	The 10 AIL movements associated with cable delivery within the solar PV sites and the 13 AIL movements associated with transformers to the 132kV and 400kV substations located in Lime Down A, C, D and E, result in a negligible number of vehicle movements per day over the two-year construction period. While not specifically referenced in Table 13-20, the AIL movements can be accounted for within the rounding of trips shown in calculations at Annex E of **ES Volume 3, Appendix 13-1: Transport Assessment [REP1-059]** which rounds total deliveries associated with Substation/BESS Aggregate from 2,842 to 2,865. The 132 AIL movements will result in a in a negligible number of vehicle movements per day when distributed over the different AIL routes and the two-year construction period. The 132 AIL movements are accounted for within the number of HGV movements in Table 13-35.

ExQ	Respondent	Question	Applicant's Response
			As set out at paragraph 13.10.58 and 13.10.100 of **ES Volume 1, Chapter 13: Transport and Access [REP1-019]**, the low number of movements associated with AIL movements, and the embedded mitigation through the **Outline CTMP [REP1-112]**, the effects of hazardous loads/large loads will be negligible and temporary and therefore not significant. These specific loads were therefore not taken forward for assessment against intimidation of non-motorised user (NMU) and road users, and accidents and safety. As set out in Appendix D of the **Outline CTMP [REP1-112]**, all AIL movements will be managed to ensure they are transported safely and with as little impact on existing road users (including NMUs) as possible. All abnormal load movements will be co-ordinated by a haulage specialist. Traffic management will be in place to support the movement. The exact nature of the traffic management will be agreed with the local highway authority and police prior to the

ExQ	Respondent	Question	Applicant's Response
			delivery being undertaken. However, it is likely to include the following procedures/measures: a. All appropriate notifications will be made to the local highway authority and local police force; b. The route will be planned and agreed with the local highway authority local police force; c. Stakeholders along the route will be notified of the date and time of the movement; d. Vehicles will be clearly marked with the appropriate plates and lighting; e. Vehicles will be escorted to the Order Limits; f. Rolling road closures will be used where necessary. To ensure minimal impact upon on the local road network, AIL vehicle movements will be undertaken during off-peak times and delivered in convoy to minimise incidents of disruption. This will be subject to the agreement and instructions of the Local Planning and Highway Authorities and the Police. The standard process for managing AIL movements is designed to ensure that each

ExQ	Respondent	Question	Applicant's Response
			movement is managed and controlled in a safe manner, with the precise safety and traffic management required determined by the highway authorities and the police. This is the established method of safely transporting AILs and the involvement of key stakeholders ensures that every AIL movement is appropriately managed. No significant effects are anticipated, in reliance on the proven efficacy of the standard AIL process.
TT1.10	The Applicant	**Construction Phase Traffic Dispersal** ES Chapter 13 [REP1-019] states that the construction vehicle routes to the Order limits would be secured though the CTMP and that there would not be transport and access effects outside these construction vehicle routes. A substantial number of RRs (too many to list) have identified concerns with the narrowness of the construction vehicle routes, so the ExA would like to understand whether the applicant has given any consideration to the likelihood for local traffic dispersal onto other roads (creating rat runs) from local people seeking to avoid the	1. The ES assessments utilise total changes in traffic flow, rather than local capacity assessments. It is not considered, given the controls on traffic movements that have been proposed in **the Outline CTMP [REP1-112]** that the Scheme would generate sufficient demand within the peak hours to warrant the need for local capacity assessments. LGV and HGV trips associated with the Scheme will take place outside the peak hours, so no capacity assessments are required. A strategic or network model would not redistribute existing traffic on the basis of the flows set out in the Lime assessment and an existing network that

ExQ	Respondent	Question	Applicant's Response
		construction vehicle routes and potential conflict with HGVs. Please direct the ExA to where this particular issue has been discussed in the application material, or provide reason for not considering local traffic dispersal and the potential effects that may have. Furthermore, the ExA would like to understand what measures are, or could be, put in place (in addition to the HIAs) to minimise safety concerns for local drivers on the construction vehicle routes?	doesn't operate at capacity and is free flowing at all times. 2. A Traffic Management and Monitoring System (TMMS) will be considered for implementation as part of the final detailed CTMP to provide details of the technologies and other means employed to monitor HGVs to/from the Compounds (e.g. Global Positioning System (GPS) and Automatic Number Plate Recognition (ANPR)). This will enable the Applicant to monitor the following: a. Compliance with the HGV routes; b. Compliance with the number of HGV limits in terms of the number of deliveries arriving and departing at any one time and over the course of the day; and c. Compliance with the timing restrictions. In addition, the TMMS will also record all LGVs which enter and exit the Solar PV Site, to allow all vehicles to be monitored. In the instance that a complaint has been made in relation to inappropriate routes being used, then this will be cross-referenced with the TMMS to allow appropriate actions to then be taken. The precise form of TMMS will be determined following the appointment of a

ExQ	Respondent	Question	Applicant's Response
			contractor and will be set out in the final detailed CTMP. This would include a summary of the contractual requirements that those visiting the Solar PV Site will have to adhere to, along with the measures to be taken for noncompliance. The overall management and implementation of the detailed CTMP will be the responsibility of the Applicant. A Traffic Safety Control Officer will be appointed by the Applicant to develop, implement and manage the CTMP. On behalf of the Applicant, the Traffic Safety Control Officer will: a. Implement and monitor the CTMP to identify successful measures and areas for improvement; b. Promote the CTMP to all staff and contractors travelling to and from the Solar PV Site to ensure compliance with its contents; c. Liaise as appropriate with local transport and traffic groups, local planning authorities, local highway authorities and National Highways; d. Monitor data relating to HGV routes, timing of HGV arrivals and departures and compliance with the HGV routing; e. Manage the Car Share Scheme; f. Manage the minibus service between local worker accommodation and the

ExQ	Respondent	Question	Applicant's Response
			Solar PV Site; and g. Discuss any issues with relevant parties and identify any amendments to the CTMP (including measures) to ensure compliance is maintained. The Applicant will take all reasonable steps to avoid any breach of the detailed CTMP through the implementation of the management measures. However, should any breaches occur, then enforcement procedures will be followed: a. The Traffic Safety Control Officer will notify the Applicant of any breaches of the detailed CTMP arrangements as and when they occur. b. The Applicant will issue a warning letter to the relevant contractor outlining what action would be taken in the event of any further noncompliance (in general terms). c. The Applicant will report the details of the response to the Traffic Safety Control Officer as part of the monitoring report. The monitoring report will be made available to the relevant local planning authorities and relevant highway authorities at their request to ensure compliance and to demonstrate that action is being taken where necessary. Further detail on the sanctions which could be applied will be

ExQ	Respondent	Question	Applicant's Response
			included within the detailed CTMP for the Solar PV Site. As well as the above listed, there will be banksmen ensuring safe egress from Sites, and traffic management measures could be put in place if considered necessary - e.g. speed restrictions; temporary traffic lights; stop/go signs.
TT1.11	The Applicant National Highways	**Construction Delivery Times** The National Highways consultation response which is summarised in ES Chapter 13 [REP1-019], notes that junctions 17 and 18 of the M4 experience peak-hour congestion. The applicant states that it is their intention to aim to reduce network peak hour construction vehicle movements by requiring deliveries to be scheduled between 09:30 and 16:30 where possible. <u>The Applicant:</u> Can the applicant clarify: 1) Whether its intention is for deliveries to be scheduled to pass through junctions 17 and 18 and be on local roads only after	1. The requirement for deliveries to be scheduled for between 0930 and 1630 would relate to the on-site arrival and departure times. However, the typical travel time to each site access point from the M4 junctions is up to around 20 minutes. They would therefore not be passing through these junctions during the typical network peak periods of 0800-0900 and 1700-1800 2. The construction vehicle route passes one school – The Shaw CoE Primary School. This affects accesses 123 to 127 which relate to one section of the Cable Route Corridor (CRC). The 22km CRC is split into 4 sections. In each section, only one access would be in use at any one time for a period of 90 days (which need not be consecutive)

ExQ	Respondent	Question	Applicant's Response
		09.30 and before 16.30, or whether those quoted delivery movement times relate to the arrival and departure times at the construction access points; 2) Whether any of the construction vehicle routes pass by primary or secondary schools (and if so where); and 3) How its delivery vehicle movements would be monitored, recorded and regulated to ensure that those vehicles are not on the local road network outside the specified times, and not on non-construction route roads at any time? The ExA note the oCTMP [REP1-112] commitment to a delivery slot booking system, but to what extent is monitoring and compliance, or non-compliance with that system to be communicated with the local highway authority and/ or National Highways? <u>National Highways</u>: Can National Highways provide further information on whether deliveries to the proposed development through junctions 17 and 18 should take place after 09:30 and before 16:30 on weekdays (or some other times)?	and associated with 4 HGV deliveries per day on average. The detailed CTMP will include a requirement for deliveries to these accesses to take place so as to avoid the school peak periods. 3. A Traffic Management and Monitoring System (TMMS) will be considered for implementation as part of the final detailed CTMP to provide details of the technologies and other means employed to monitor HGVs to/from the Compounds (e.g. Global Positioning System (GPS) and Automatic Number Plate Recognition (ANPR)). This will enable the Applicant to monitor the following: a. Compliance with the HGV routes; b. Compliance with the number of HGV limits in terms of the number of deliveries arriving and departing at any one time and over the course of the day; and c. Compliance with the timing restrictions. In addition, the TMMS will also record all LGVs which enter and exit the Solar PV Site, to allow all vehicles to be monitored. In the instance that a complaint has been made in relation to inappropriate routes being used, then this will be cross-referenced with the

ExQ	Respondent	Question	Applicant's Response
			TMMS to allow appropriate actions to then be taken. The precise form of TMMS will be determined following the appointment of a contractor and will be set out in the final detailed CTMP. This would include a summary of the contractual requirements that those visiting the Solar PV Site will have to adhere to, along with the measures to be taken for noncompliance.
TT1.12	The Applicant	**Deliveries** The applicant states in paragraph 13.4.5 of ES Chapter 13 [REP1-019] that for the purpose of the transport assessment it has been assumed that only fixed solar PV panels are used across the scheme, with no tracker PV panels, because this scenario would require the greatest number of deliveries. Can the applicant explain why fixed solar PV panels would generate more deliveries than tracker PV panels?	This Applicant makes note of this comment. The transport assessment was undertaken on the basis that a fixed panel layout will fit more panels (higher density) per hectare than a tracker layout. As set out during Issue Specific Hearing 1, at an individual panel level, a fixed south-facing panel achieves lower energy generation to a tracker panel. This is because the tracker panel follows the sun for a greater proportion of the day. However, when considering panels in a fixed area of land, a greater installed capacity can be achieved through the use of fixed panels. This is due to efficient layouts of tracker panels requiring greater spacing. A fixed panel layout will therefore be denser than a tracker panel layout, require a greater number of panels, and

ExQ	Respondent	Question	Applicant's Response
			accordingly, a greater number of vehicle movements to deliver those panels. Please refer to page 36 of the Written Summary of the Applicant's Oral Submissions and Responses at Issue Specific Hearing 1 and Responses to Action Points [REP1A-012].
TT1.13	The Applicant	**Receptor Sensitivity** Table 13-3 of ES Chapter 13 [REP1-019] sets out the applicant's categorisation of traffic and transport receptor sensitivity. The ExA note that within the definition column there is no reference to rural roads, pedestrians, cyclists, equestrian or open recreational receptors (for example public rights of way), so the ExA is unclear whether those receptors fall within the applicant's high, medium, low or negligible sensitivity categories. In addition, for the low and negligible sensitivity categories, the ExA is unclear overall which receptors would fall into those categories, as no examples are given in the table of the types of receptors with low sensitivity to traffic flows or no material sensitivity to traffic flows. The applicant is therefore required to revisit and update Table 13-3 to address its shortcomings, and	The Table 13-3 of **ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1]** (Revision 3) has been updated in the latest submission at Deadline 3 to add further explanation on receptor sensitivity definitions. The Applicant has also updated Tables 13-4 and 13-5 to explain this for each link explaining the classification for a low sensitive receptor, i.e. little or no trip attractors or facilities, low levels of historical collisions, low pedestrian footfall and uncongested areas. Receptors that that experience no effect as a result of changes in traffic levels, the road network, public realm or road safety. The ISEP guidance (Ref 31) doesn't define sensitivity by road geometry, instead it focuses on people and land use affected by traffic. Road width is a physical road characteristic, so is not considered in the receptor sensitivity but

ExQ	Respondent	Question	Applicant's Response
		subsequently confirm whether any changes are also required to the 'Additional Explanation' column in Tables 13-4 and 13-5 as a result of the update to Table 13-3.	is considered under magnitude of impact and baseline conditions. Table 13-3 of **ES Volume 1, Chapter 13: Transport and Access ([EN010168/APP/6.1]** (Revision 3) sets out sensitivity thresholds and states that receptors of high sensitivity are those with greatest sensitivity to traffic flows such as schools, hospitals, playgrounds/recreational spaces, accident blackspots, retirement/nursing homes and areas with no footways with high pedestrian footfall and congested areas. Receptors with medium sensitivity to traffic flow, would include conservation areas, historical buildings, tourist attractions, and residential areas. The Applicant's assessment classifies B Roads and any unnumbered/unclassified roads, away from residential areas as having low sensitivity except for those that pass through the CNL. The assessment classes unnumbered/unclassified roads that pass through residential areas as medium sensitivity including PRoW's.

ExQ	Respondent	Question	Applicant's Response
			The assessment determined that there was not a large concentration of vulnerable users on the construction routes from site observations and initial surveys, and so did not identify the links on the construction routes as sensitive.
TT1.14	The Applicant	**Major Receptors** Paragraph 13.6.23 of ES Chapter 13 [REP1-019] states that there are no major receptors on the Motorway and A-Roads within the Study Area. Therefore, they are deemed to have negligible sensitivity to traffic flow changes. Can the applicant direct the ExA to where in ES Chapter 13 they have explained which receptors are major and minor?	The Applicant makes note of this comment. This should say 'no high sensitivity receptors' rather than 'major receptors **ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1]** (Revision 3) submitted at Deadline 3 has been updated to include this change. The sensitivity of links is set out in Table 13-4 of **ES Volume 1, Chapter 13 Transport and Access [REP1-019]**.
TT1.15	The Applicant	**Public Bus Providers** Tables 13-10 and 13-11 of ES Chapter 13 [REP1-019] describes local bus routes within the Order limits. Can the applicant provide evidence of their consultation and correspondence with bus companies in relation to any potential disruptions to local bus services / routes during the construction phase?	There are no bus services that run along Bradfield Cottages or the Fosse Way. Service 99 runs between Chippenham and Swindon and along the road east of Hullavington with a frequency of 1 an hour. This bus service would have been picked up in the ATC's and form part of the baseline. The peak construction vehicle flows are not high enough to affect the operation of these existing bus services. Accordingly, as the construction of the Scheme

ExQ	Respondent	Question	Applicant's Response
			is not anticipated to affect bus services, the Applicant has not consulted with bus companies directly.
TT1.16	The Applicant	**The Street, Grittleton** The ExA note the proposal to use The Street, Grittleton as part of the CRC construction vehicle access. What alternative routes exist or were considered to avoid using The Street, and why were they discounted?	The Applicant makes note of this comment. The reasons for the selection of this route are set out in the **Construction Routes in the Cotswold National Landscape Technical Note [REP1-131]**.' There are only two possible alternative routes: through Hullavington Village and through Stanton St Quinton. Both of these alternative routes were avoided as they routed through village centres and directly passed a primary school. The Grittleton route does not route directly past any school frontage, making it the preferred option.
TT1.17	The Applicant	**Haul Roads** Paragraph 13.10.7 of ES Chapter 13 [REP1-019] and paragraph 2.1.9 of the oCTMP [REP1-112] state that *the proposed haul roads serving Lime Down B from Access 4 and Lime Down D from Access 10 will be temporary for construction, replacement and decommissioning phases only*. There are further references to haul roads in ES Chapter	The Applicant makes note of this comment. The term haul road is synonymous with the term access track.

ExQ	Respondent	Question	Applicant's Response
		13 and ES Appendix 13.1 (Transport Assessment) [REP1-057]. However, Figures 3-1 to 3-1-5 [APP-081] and 3-2 to 3-2-10 [APP-082] do not include any legend for haul roads, yet access tracks are identified. Can the applicant clarify whether the term haul road is synonymous with the terms access track in the application material, and if not whether the haul roads should be annotated on the aforementioned plans, and included as separate plans within the oCTMP?	
TT1.18	The Applicant	**Non-Motorised User (NMU) Delay, Amenity, Severance and Safety** Various paragraphs in section 13.10 of ES Chapter 13 [REP1-019] state that NMU flows and activity on local roads are observed to be low, and as a result the effects of construction vehicles to the local highway network is not likely to result in any significant delay to NMUs on the local highway network, while the effects of construction vehicles on NMU delay on the local highway network is considered to be minor. Similarly, the applicant has concluded that the likely effects on NMU amenity (including fear and intimidation) during the	The likely effects of the scheme in relation to severance have been considered in paragraphs 13.10.36 to 13.10.38 of **ES Volume 1, Chapter 13 Transport and Access [REP1-019]** in relation to the temporary construction phase for the Solar PV Panels and in paragraphs 13.10.80 to 13.10.82 in relation to the temporary construction phase for the Cable Route Corridor. These were assessed in line with ISEP guidelines which relates to changes in all traffic flows, rather than only HGVs. As set out in the ISEP guidelines, severance is defined as "the perceived division that can occur within a community when it becomes

ExQ	Respondent	Question	Applicant's Response
		construction phase would also only be minor adverse and temporary on the local highway network. However, in relation to severance and safety, no consideration at all has been given to the potential impact on NMUs from an increase in HGV movements during the construction (and maintenance) periods. During its unaccompanied site inspections, the ExA observed pedestrians, cyclists and horse riders using the local roads, and due to the lack of dedicated footways at the side of many roads, the ExA itself had cause to regularly walk in the roads (particularly between PRoW links). This suggests that NMU activity on the local road network is more prevalent and unavoidable that the applicant's assessment concludes, meaning that the effects on NMU delay, amenity, severance and safety is likely to be understated. To dispel the ExA's concerns that the applicant has not sufficiently assessed NMU activity on the local road network, can the applicant advise whether it undertook an analysis of local trip generators and amenities in the traffic and transportation study area(s) to identify likely	separated by major transport infrastructure' that 'separate people from places and other people". This relates, for example, to difficulties crossing roads or a physical barrier created by the infrastructure itself. The ability of pedestrians to cross a road is related to the relative gaps between vehicles. The presence of these gaps is not dependent on the classification of the vehicles and the change in HGVs is therefore not a relevant consideration in regard to severance. The likely effects of the scheme in relation to safety have been considered in paragraphs 13.10.53 to 13.10.56 in **ES Volume 1, Chapter 13: Transport and Access [REP1-019]** in relation to the temporary construction phase for the Solar PV Panels and in paragraphs 13.10.96 to 13.10.98 in **ES Volume 1, Chapter 13: Transport and Access [REP1-019]** in relation to the temporary construction phase for the Cable Route Corridor. These considered collision records which relate to all road users, and it was concluded that there would not be a significant effect. Notwithstanding this, the further mitigation measures set out in 13.11

ExQ	Respondent	Question	Applicant's Response
		desire lines for pedestrians, cyclists and equestrians? Can the applicant advise what surveys were done in relation to NMU movements on the local highway network, when they were undertaken, and where in the application material the results of those surveys are provided? Can the applicant advise why it has not given any consideration to NMU safety in its assessment of effects from construction traffic? Can the applicant advise that it has had regard to the requirements of the Highway Code sections 213 – 215, and how these requirements have been factored into their assessment of suitability of the construction vehicle routes?	includes for Stage 1 and 2 Road Safety Audits to be undertaken at all access junctions, which would include recommendations for addressing any safety concerns. It is noted that whilst NMUs may make use of the carriageway, for example to transfer between PRoWs, this is considered in the assessment of the sensitivity of the link and therefore factored into all parts of the assessment. By way of example, pedestrian usage leading to a finding that a link was of high sensitivity would typically be found in an urban area without pedestrian infrastructure that has high pedestrian footfall, such as from a new housing estate to nearby shops. With regard to the specific questions provided by the ExA: 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

ExQ	Respondent	Question	Applicant's Response
			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. To establish the likely potential for pedestrian movements along the construction route at Bradfield Cottages, an assessment of residential trip rates (from the TRICS database) has been undertaken to establish the potential for walking trips associated with Hullavington. The National Travel Survey (NTS) (ref. 0409a), which includes recreational and leisure trips, 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

ExQ	Respondent	Question	Applicant's Response
			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 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. 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 Applicant's analysis is not restricted to January surveys, but also includes bank holiday peaks (see below). Based on the information set out above, it remains the case that the number of pedestrian and cycle movements is not significant and the effect of the Scheme will not be material with

ExQ	Respondent	Question	Applicant's Response
			regard to NMU delay, amenity, severity or safety. 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. 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 average across the delivery hours from Tuesday to Friday. 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.

ExQ	Respondent	Question	Applicant's Response
			The combined peak number of pedestrians and cyclists in a single hour was recorded as 12 on Fosse Way. Again, on review of the survey data, there were 2 groups of pedestrians and 3 groups of cyclists on Fosse Way. Based on the above, there is no significant existing usage by NMUs. See above in relation to the assessment of safety. In relation to the requirements of the Highway Code sections referred to: Rule 213 – this section confirms that cyclists and horse riders may ride in the centre of the lane for safety on narrow lanes, that cyclists may ride two abreast, and reminds drivers that cyclists are advised to ride at least a door's width away from parked cars for their safety. It further notes that motorcyclists, cyclists and horse riders may suddenly need to avoid obstacles and should be given plenty of room in case of sudden changes in direction.

ExQ	Respondent	Question	Applicant's Response
			Rule 214 – this section relates to animals, confirming that the driver should drive slowly, be given plenty of room, and care should be taken to avoid scaring them by sounding the horn, revving the engine or accelerating rapidly. Rule 215 – this section relates to horse riders and horse-drawn vehicles. Drivers should slow to 10mph, pass wide and slow, and allow at least 2 metres of space. The rule also notes that horse riders are often children, may ride in double file when escorting young or inexperienced riders, and to watch out for signals from the horse rider. These Rules add context to the main rules governing overtaking of NMUs, set out below. The use of the roads forming the construction routes by NMUs has been considered and factored into route selection and the assessment of transport effects. The **Outline CTMP [EN010168/APP/7.22 (Rev 3)]** includes relevant advice for construction vehicle drivers when encountering equestrian users, noting that Rule 215 emphasises that horses are flight animals and that "there are three brains at work

ExQ	Respondent	Question	Applicant's Response
			when you pass a horse; the rider's, the driver's and the horse's" (see below). The relevant elements of the highway code that relate to overtaking are below: Rule 163 states: a. allow at least 2 metres of space and keep to a low speed when passing a pedestrian who is walking in the road (for example, where there is no pavement) b. leave at least 1.5 metres when overtaking cyclists at speeds of up to 30mph, and give them more space when overtaking at higher speeds c. pass horse riders and horse-drawn vehicles at speeds under 10 mph and allow at least 2 metres of space Rule 72 of the Highway Code states: a. When riding on busy roads, with vehicles moving faster than you, allow them to overtake where it is safe to do so whilst keeping at least 0.5 metres away, and further where it is safer, from the kerb edge.

ExQ	Respondent	Question	Applicant's Response
			Combining the results in the following widths: a. Passing Pedestrians – 2m space + 0.5m pedestrian width + 2.5m HGV width = 5m road width b. Passing Cyclists – 1.5m space + 1m cyclist width + 0.5m gap to kerb + 2.5m HGV width = 5.5m road width c. Equestrians – 2m space + 1.5m equestrian width + 2.5m HGV width = 6m road width Whilst these road widths are available at various points along the construction routes the **Outline CTMP [EN010168/APP/7.22 (Rev 3)]** includes text to advise drivers to adhere to the Highway code and drive carefully and give way where required. These rules have referenced in the **Outline CTMP [EN010168/APP/7.22 (Rev 3)]**. Additional text in the **Outline CTMP [EN010168/APP/7.22 (Rev 3)]** Section 6.15 includes advice for drivers when meeting Equestrian users including: a. All drivers will receive a site induction, including:

ExQ	Respondent	Question	Applicant's Response
			i. Awareness of horse riders Behaviour when encountering horses: ii. Slow to <10 mph iii. Avoid revving engines iv. Do not overtake unless signalled by rider v. Stop engine where necessary
TT1.19	Wiltshire Council (Local Highway Authority)	**Road Safety Data** The applicant states in ES Appendix 13.1 (Transport Assessment) [REP1-057] that it obtained personal injury collision statistics on the local road network from Wiltshire Council. Can the Council advise if it keeps data on road traffic collisions with pedestrians, cyclists and horse riders and if so, whether this data was provided to the applicant and can be submitted into the Examination? The period 2018-2023 is the data period that the applicant has used, so for consistency purposes it is this period which the ExA is interested in.	PIC records are compiled from STATS19 data provided by the Police and relate to all reported incidents. This includes all road users.
TT1.20	The Applicant	**Road Safety Audit** Road safety audits are carried out to identify potential safety hazards for all road users, including pedestrians, cyclists, horse riders and	Road Safety Audits (RSA) are undertaken in accordance with DMRB GG119, which states that they apply "*Where there are physical changes to the highway impacting on road user*

ExQ	Respondent	Question	Applicant's Response
		motorists, and to recommend measures to reduce accidents and injuries. Wiltshire Council [REP1-137], SLD [REP1-172] and many other interested parties have expressed concern about the narrowness of many of the construction route roads for two HGVs to pass and lack of visibility in some locations. The ExA note that Annexes J and K in updated ES Appendix 13-1 (Transport Assessment) [REP1-059] (Part 2, from page 167) show the 'Construction Route Swept Path Analysis' for one 16.5m HGV and a car passing, and two 16.5m HGVs passing along all the minor roads being proposed for construction access. However, the lack of carriageway dimensions and other details on the figures (such as kerbing, verges, height of hedges and walls, and so on) and the lack of safety assessment, particularly for vulnerable road users, is a very real concern. The applicant is asked to explain why it has not commissioned a road safety audit at this time and why it thinks a post-decision, pre-construction survey would be adequate to identify potential poor safety blackspots and	*behaviour or resulting in a change to the outcome of a collision on the trunk road and motorway network".* The usage of existing roads by construction traffic would therefore not typically fall within the remit of RSA, as it does not constitute a 'physical change to the highway'. Existing accident data has been used to identify safety blackspots on the existing highway network, whilst RSAs are used to ensure that changes to the highway are designed so that they do not create new safety blackspots. The suitability of the use of these routes is therefore considered in relation to personal injury collision records and professional judgement. In respect of the potential for safety changes to NMUs, this is considered in the assessment of fear and intimidation, which was undertaken in the ES. A safety assessment was undertaken in table 13-14 and 13-14 and paragraphs 13.10.53 to 13.10.56 of **ES Volume 1, Chapter 13: Transport and Access [REP1-019]**. The PIC data over 5 years was obtained from Wiltshire Council. Only 13 total collisions were recorded over 5 years on the links taken forward for

ExQ	Respondent	Question	Applicant's Response
		recommend measures to reduce accidents and injuries without creating materially new or materially different environmental effects.	further assessment. On Fosse Way only one collision was recorded with a single car as a result of black ice. On Alderton Road no accidents were observed. On Bradfield Cottages only two accidents were recorded both single vehicles. Only one accident included a non-motorised user on the roundabout east of Hullavington. The 3 accidents on the B4040 involving motorcyclists misjudging a bend, as set out in the ES and now included in the updated **Outline CTMP [EN010168/APP/7.22 (Rev 3)]** submitted at Deadline 3, signage will be located here to warn drivers and riders of construction traffic. The accident study included in **ES Volume 1, Chapter 13: Transport and Access [REP1-019]** also shows that there were three accidents over 5 years at Fowlswick Lane; in this case, the addition of construction vehicles did not exceed the thresholds for detailed assessment and are considered to be within the realm of ordinary fluctuations in traffic flows. Given these routes already experience HGV's, deliveries are set to outside of peak hours, there is no existing accident record on Fosse

ExQ	Respondent	Question	Applicant's Response
			Way or Bradfield Cottages and the deliveries are managed through the **Outline CTMP [REP1-096]** the conclusion is that the likely effects of the increase in vehicle numbers including HGVs on road users and pedestrian safety, including changes to fear and intimidation of NMUs, is likely to be negligible. It is also noted that the construction period is temporary, and would not lead to a permanent change to highway safety.
TT1.21	The Applicant	**Additional Mitigation** The applicant has reported a fatal accident recorded on the B4040 construction vehicle route for Lime Down A, B and C, and has noted that it would provide additional warning signage of oncoming bends in this location during the construction phase. The ExA requires the applicant to update the oCTMP [REP1-112] to include this measure	The updated **Outline CTMP [EN010168/APP/7.22 (Rev 3)]** has been submitted at Deadline 3 to include this measure.
TT1.22	The Applicant	**ES Chapter 13 Corrections** Paragraph 13.13.7 of ES Chapter 13 [REP1-019] refers to Table 13-45 twice. The second reference should be corrected to Table 13-44.	**ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1 (Rev 3)]** has been updated to address these corrections at Deadline 3.

ExQ	Respondent	Question	Applicant's Response
		Paragraph 13.13.8 refers to Table 13-47. This reference should be corrected to Table 13-46.	
TT1.23	The Applicant	**Proposed Cable Route Access Locations Q1** Paragraph 4.4.2 of the oCTMP [APP-287] provides a bulleted list of cable construction route access locations. Access 116 is not accounted for in the list, but pursuant to the Access Plan provided in application Figure 2.6 [APP-010] and ES Figure 13-12-4 [APP-157] it is co-located with access 117. As a result of this omission in the bulleted list, the rest of the oCTMP bulleted list and the locations attributed to each of the remaining accesses is also brought into question, particularly as the last bullet refers to access 127 and 1228, despite there being no access 1228 (or 128 if accounting for a typographical error) shown in the Access Plan provided in application Figure 2.6 [APP-010]. The applicant is asked to rectify the errors in paragraph 4.4.2 of the oCTMP.	The **Outline CTMP [EN010168/APP/7.22 (Rev 3)]** submitted at Deadline 3 has been updated to rectify this error
TT1.24	The Applicant	**Proposed Cable Route Access Locations Q2** The cable route access locations are shown in Appendix B of the oCTMP [APP-287] (although these are missing from the updated version at	The **Outline CTMP [EN010168/APP/7.22 (Rev 3)]** submitted at Deadline 3 has been updated to rectify this error.

ExQ	Respondent	Question	Applicant's Response
		D1 [REP1-112]). Access location 110 shown on Drawing No. PL110 Rev C in Appendix B appears to be access location 111 on Sheet 11 of the Access Plan provided in application Figure 2.6 [APP-010]. Similarly access location 111 shown on Drawing No. PL111 Rev C in Appendix B of the oCTMP [APP-287] appears to be access location 110 on sheet 11 of the Access Plan provided in application Figure 2.6 [APP-010]. The applicant is requested to rectify the discrepancy between the two documents and reinstate Appendix B in full into the next version of the oCTMP (in line with ExQ1 TT 1.2 above).	

2.19 Other Environmental Matters

ExQ	Respondent	Question	Applicant's Response
OEM1.1	The Applicant Mr Simon Durrant	400kV Cable Lifespan Mr Durrant's D1 submission [REP1-239] **provides comment that a typical 400kV cable typically has a 40-year lifespan.** Applicant**:** Please provide comment and, if necessary, detail any maintenance work required to renew the cable **and update the oOEMP [REP1-098].** Mr Durrant**:** **Please provide a copy of '*The challenges with undergrounding at 400kV*' by Scottish and Southern Electricity Networks as referenced in your WR [REP1-239].**	The Applicant acknowledges that SSEN's 400kV cable specification states a minimum 40-year lifespan, however, as set out in **ES Volume 1, Chapter 3: The Scheme [APP-055]**, it is assumed that all cabling will operate for the whole of the Scheme's operational lifespan with ongoing and reactive maintenance considered in the ES. An operational life of up to 60 years or longer is achievable for XLPE cabling when appropriately designed, installed, operated and maintained. In the **Outline OEMP [REP1-098]**, which is secured by Requirement 14 of the **Draft DCO [REP1-007]**, it states that the maintenance work conducted will be routine inspections and reactive maintenance should the cable be damaged. To the extent that repairs are required to any part of the 400kV cable, the DCO enables the necessary access to the Cable Route Corridor and associated works for such repairs to be undertaken during the operational phase. If any sections of cable were unable to be repaired during the

ExQ	Respondent	Question	Applicant's Response
			operational phase, sections of cable could be replaced as part of the maintenance activities assessed. It would not however, require a wholesale replacement of the entire 400kV cable at once. Instead, any programme of cable repair or replacement would be staged into smaller sections to maintain the electrical export to the National Grid.

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Annex A ALT1.2 – Constraints of Land around Solar PV Sites

385000 390000 395000

190000 185000 180000

25 km 25 km

Lime Down Solar Park

Title:
Figure ALT1.2: Constraints on Land around the Solar PV Sites

Document:
Response to Written Questions
Table 2-2 Assessment of Alternatives

Legend:

- Solar PV Sites
- Cable Route Corridor
- Area of Search
- National Grid 400kV Overhead Line
- Built-up Area
- National Landscape

Listed Building

- Grade I
- Grade II*
- Grade II
- Scheduled Monument
- Park and Garden
- Conservation Area
- Common Land
- Site of Special Scientific Interest (SSSI)
- Ancient Woodland
- Local Nature Reserve (LNR)
- Flood Zone 3
- Flood Zone 2
- National Grid Gas Pipeline
- Minor
- B Road
- Motorway
- Primary
- Railway
- Historic Landfill Site
- Authorised Landfill Site
- Reduction in Solar PV Sites between PEIR and DCO Application Submission

Predictive High Grade ALC

- Grade 1
- Grade 2
- Grade 3a

Public Right of Way (PRoW)

- Restricted Byway
- Byway Open to All Traffic
- Bridleway
- Footpath

Regional Cycleway

- Wiltshire Cycleway

Long Distance Walking Route

- Macmillan Way
- White Walls Way
- urban_region



APFP Regulation: 5(2)(a)

Application Doc No.: EN010168/APP/6.3

Drawing no.: P4443_LPR_ZZ_XX_DR_Z_EXA_0364

Coordinate system: British National Grid

Scale: 1:50,000 @ A3

N W E S

0 1 2 3 km

Island GREEN POWER

Lanpro

Data: OS, Natural England, ONS, IGP, 2025.
Base map: © Crown copyright and database rights 2025 Ordnance Survey 0100031673. Contains OS data © Crown Copyright and database right 2026.
Contains data from OS Zoomstack

Annex B FHW1.2.1 – Applicant Response to Stop Lime Down Table

Table FHW1.2-1: Applicant's response to SLD's Table 1 on NPS EN-1 paragraph 5.8.15

NPS EN-1 paragraph 5.8.15 requirement raised by SLD	SLD position	Agree / Disagree	Applicant's response	Specific signposting
be proportionate to the risk and appropriate to the scale, nature and location of the project	No. For a large-scale, high-risk project in a sensitive location, too many important factors are deficient. These include: flawed modelling of fluvial flooding, which is ignored by the Applicant in assessing risk; the FRA is overwhelmingly concerned with protecting scheme assets rather than people who live on- or off-site; failure to assess the risks of surface water flooding to houses and transport infrastructure; no dynamic modelling which might evaluate flood duration and stream velocity; mitigation plans are vague and unspecific; there are no valid proposals for monitoring the effects on local rivers; and other matters mentioned in the text	Disagree.	The assessment is proportionate to the mechanisms involved and to the scale, nature and location of the Scheme. NPS EN-1 requires a proportionate FRA; it does not require blanket dynamic hydraulic modelling across all panelled areas. The FRA considers both flood risk to the Scheme and flood risk arising from the Scheme, including potential effects on people, property, infrastructure and land outside the Order Limits. The Applicant's assessment is mechanism-specific: fluvial risk is assessed using Environment Agency mapping, Product 4 data, site-specific modelling where justified and open-channel calculations for smaller ordinary watercourses where proportionate; formal impermeable infrastructure is assessed quantitatively; panelled areas are assessed having regard to their permeable ground condition, vegetation cover, soil management and hydrological connectivity. This is consistent with NPS EN-3 paragraph 2.10.84, which recognises that, as solar PV panels drain to the existing ground, the impact will not in general be significant. The Applicant does not rely on separate PINS scoping guidance for this point; the solar-specific policy position in NPS EN-3 and the site-specific flood risk evidence provide the relevant basis for the assessment. The Scheme is not predicted to increase off-site flood risk.	**ES Volume 3, Appendix 11-1 Flood Risk Assessment and Drainage Strategy Covering Report (Rev 2) [REP1-037]** Sections 2.2, 3.2, 3.3, 5 and 6 set out the FRA objectives, embedded mitigation, fluvial/surface water assessment, soil management and drainage strategy. **ES Volume 3, Appendix 11-2 Flood Risk Assessment and Drainage Strategy Lime Down A (Rev 2) [REP1-039]** **ES Volume 3, Appendix 11-3 Flood Risk Assessment and Drainage Strategy Lime Down B (Rev 2) [REP1-041]** **ES Volume 3, Appendix 11-4 Flood Risk Assessment and Drainage Strategy Lime Down C1 (Rev 2) [REP1-043]** **ES Volume 3, Appendix 11-5 Flood Risk Assessment and Drainage Strategy Lime Down C2 (Rev 2) [REP1-045]** **ES Volume 3, Appendix 11-6 Flood Risk Assessment and Drainage Strategy Lime Down D (Rev 2) [REP1-047]** **ES Volume 3, Appendix 11-7 Flood Risk Assessment and Drainage Strategy Lime Down E1 (Rev 2) [REP1-049]** **ES Volume 3, Appendix 11-8 Flood Risk Assessment and Drainage Strategy Lime Down E2 (Rev 2) [REP1-051]** **ES Volume 3, Appendix 11-9 Flood Risk Assessment and Drainage Strategy Cable Route Corridor (Rev 2) [REP1-053]** Sections 1 and 2 set out the site baseline and flood source assessments. Section 3 sets out conclusions and recommendations. Updated Outline Drainage Strategy sections will be added at Deadline 4. **9.28 Applicant's Response to Lead Local Flood Authority on Hydraulic Modelling Requirements [REP2-045]** explains why whole-Scheme dynamic modelling of panelled areas is not required. See also **Response to ExQ1 FHW1.1, FHW1.3, FHW1.5 and FHW1.9**.
consider the risk of flooding arising from the project in addition to the risk of flooding to the project	No. Risks to the project are discussed, but flooding arising from the project is hardly considered. Apart from the minor matter of the volume of the legs of the solar panels, the Applicant simply assumes it is not going to occur.	Disagree.	The FRA considers flood risk both to and from the Scheme. SLD's position treats the panelled areas as if they form a connected impermeable drainage catchment. That is not correct. Solar PV panels are elevated above ground and rainfall drains to the existing ground beneath and between panel rows. The piles and legs are a negligible physical footprint and do not create a connected impermeable catchment. The number of piles does not alter that principle, because the relevant issue is whether runoff is intercepted and connected to a drainage system or flow route. Formal impermeable infrastructure, including substations, BESS compounds and other hardstanding, is separately drained, attenuated and controlled to the agreed discharge principles. Panelled-area runoff is controlled at source through vegetation, soil compaction control, surface flow connectivity and maintenance of existing drainage pathways. The Scheme is not predicted to increase off-site flood risk.	**ES Volume 3, Appendix 11-1 Flood Risk Assessment and Drainage Strategy Covering Report (Rev 2) [REP1-037]** Sections 3.2, 3.3, 5 and 6 address panelled-area runoff, embedded mitigation, formal drainage and drainage principles. Site-specific appendices: **ES Volume 3, Appendix 11-2 Flood Risk Assessment and Drainage Strategy Lime Down A (Rev 2) [REP1-039]** **ES Volume 3, Appendix 11-3 Flood Risk Assessment and Drainage Strategy Lime Down B (Rev 2) [REP1-041]** **ES Volume 3, Appendix 11-4 Flood Risk Assessment and Drainage Strategy Lime Down C1 (Rev 2) [REP1-043]** **ES Volume 3, Appendix 11-5 Flood Risk Assessment and Drainage Strategy Lime Down C2 (Rev 2) [REP1-045]** **ES Volume 3, Appendix 11-6 Flood Risk Assessment and Drainage Strategy Lime Down D (Rev 2) [REP1-047]** **ES Volume 3, Appendix 11-7 Flood Risk Assessment and Drainage Strategy Lime Down E1 (Rev 2) [REP1-049]** **ES Volume 3, Appendix 11-8 Flood Risk Assessment and Drainage Strategy Lime Down E2 (Rev 2) [REP1-051]** **ES Volume 3, Appendix 11-9 Flood Risk Assessment and Drainage Strategy Cable Route Corridor (Rev 2) [REP1-053]** Sections 2.8 to

NPS EN-1 paragraph 5.8.15 requirement raised by SLD	SLD position	Agree / Disagree	Applicant's response	Specific signposting
				2.11 address residual risk, embedded mitigation and off-site flood risk. Updated Outline Drainage Strategy sections will be added at Deadline 4. **9.28 Applicant's Response to Lead Local Flood Authority on Hydraulic Modelling Requirements [REP2-045]** addresses the proportionality of modelling panelled areas. See also response to FHW1.1.
take the impacts of climate change into account, across a range of climate scenarios, clearly stating the development lifetime over which the assessment has been made	Yes.	Agree.	The Applicant agrees that this requirement is addressed. Climate change allowances are stated and applied to the assessment of fluvial and rainfall-related flood risk where relevant. Drainage for formal impermeable infrastructure is assessed on the basis of the 1 in 100 year event plus climate change, with the 60-year operational lifetime of the Scheme taken into account.	**ES Volume 3, Appendix 11-1 Flood Risk Assessment and Drainage Strategy Covering Report (Rev 2) [REP1-037]** Section 2.4 sets out climate change allowances and design life assumptions. **ES Volume 3, Appendix 11-6 Flood Risk Assessment and Drainage Strategy Lime Down D (Rev 2) [REP1-047]** Sections 3.3 and 3.4 set out the BESS drainage calculations, including climate change allowance. Site-specific appendices: also address climate change in the flood risk assessment where relevant.
be undertaken by competent people, as early as possible in the process of preparing the proposal	Yes.	Agree.	The Applicant agrees that this requirement is addressed. The FRA and Drainage Strategy documents were prepared by Arthian as competent flood risk and drainage consultants, supported by the wider EIA team. The assessment was developed through the pre-application stage and through engagement with the Environment Agency and Wiltshire Council LLFA.	**ES Volume 3, Appendix 1-1 Statement of Competence [APP-180]** sets out the competence of the assessment team. **ES Volume 3, Appendix 11-1 Flood Risk Assessment and Drainage Strategy Covering Report (Rev 2) [REP1-037]** front matter and Section 3.4 identify authorship and consultation. **ES Volume 1, Chapter 11 Hydrology, Flood Risk and Drainage (Rev 2) [REP1-017]** Table 11-1 summarises consultation and engagement. **9.28 Applicant's Response to Lead Local Flood Authority on Hydraulic Modelling Requirements [REP2-045]** summarises pre-application engagement on modelling scope.
consider both the potential adverse and beneficial effects of flood risk management infrastructure, including raised defences, flow channels, flood storage areas and other artificial features, together with the consequences of their failure and exceedance	No. Little or no discussion of any of this. Flood management infrastructure is mentioned, but there are no specific plans, assessments of the amount required and whether it can be accommodated on site, or discussion of the consequences of exceedance.	Disagree.	The Scheme does not rely on raised flood defences or flood defence infrastructure to make it acceptable in flood risk terms, so the failure of such infrastructure does not arise. The relevant flood risk management infrastructure is the formal drainage infrastructure for impermeable areas. The effect of that infrastructure has been considered: its purpose is to attenuate and control runoff so that discharge from formal drainage areas is restricted to the agreed greenfield-equivalent or betterment rates. The effect is therefore neutral in flood risk terms, rather than adverse or beneficial. Exceedance is addressed through design principles requiring safe storage, routing and conveyance of flows where the drainage system capacity is exceeded. Final drainage features will be confirmed through the detailed drainage strategy secured by Requirement 11.	**ES Volume 3, Appendix 11-1 Flood Risk Assessment and Drainage Strategy Covering Report (Rev 2) [REP1-037]** Sections 6.3 to 6.5 set out the drainage hierarchy, SuDS options, discharge control and exceedance principles. **ES Volume 3, Appendix 11-6 Flood Risk Assessment and Drainage Strategy Lime Down D (Rev 2) [REP1-047]** Sections 3.2 to 3.10 provide the most detailed submitted example for the BESS drainage strategy, including attenuation, outfall control and maintenance. **3.1 Draft Development Consent Order (Rev 2) [REP1-007]** Requirement 11 secures detailed drainage approval.
consider the vulnerability of those using the site, including arrangements for safe access and escape	Yes.	Agree.	The Applicant agrees that this requirement is addressed. The Scheme is essential infrastructure with limited operational attendance. The assessment is proportionate to that use and vulnerability classification. More vulnerable infrastructure is sequentially located in areas of lower flood risk where practicable. Residual access and operational safety matters are managed through the relevant detailed management plans.	**ES Volume 3, Appendix 11-1 Flood Risk Assessment and Drainage Strategy Covering Report (Rev 2) [REP1-037]** Section 2.2 sets out the FRA objectives and vulnerability context. Site-specific appendices: **ES Volume 3, Appendix 11-2 Flood Risk Assessment and Drainage Strategy Lime Down A (Rev 2) [REP1-039]** **ES Volume 3, Appendix 11-3 Flood Risk Assessment and Drainage Strategy Lime Down B (Rev 2) [REP1-041]** **ES Volume 3, Appendix 11-4 Flood Risk Assessment and Drainage Strategy Lime Down C1 (Rev 2) [REP1-043]** **ES Volume 3, Appendix 11-5 Flood Risk Assessment and Drainage Strategy Lime Down C2 (Rev 2) [REP1-045]**

NPS EN-1 paragraph 5.8.15 requirement raised by SLD	SLD position	Agree / Disagree	Applicant's response	Specific signposting
				ES Volume 3, Appendix 11-6 Flood Risk Assessment and Drainage Strategy Lime Down D (Rev 2) [REP1-047] **ES Volume 3, Appendix 11-7 Flood Risk Assessment and Drainage Strategy Lime Down E1 (Rev 2) [REP1-049]** **ES Volume 3, Appendix 11-8 Flood Risk Assessment and Drainage Strategy Lime Down E2 (Rev 2) [REP1-051]** **ES Volume 3, Appendix 11-9 Flood Risk Assessment and Drainage Strategy Cable Route Corridor (Rev 2) [REP1-053]** Sections 2.8 to 2.10 address source-specific flood risk, flood depths, infrastructure vulnerability and safe operation where relevant. **7.12 Outline Construction Environmental Management Plan (Rev 3) [REP2-019]** secures construction management controls. **7.13 Outline Operational Environmental Management Plan (Rev 3) [REP2-021]** secures operational management controls.
consider and quantify the different types of flooding (whether from natural and human sources and including joint and cumulative effects) and include information on flood likelihood, speed-of-onset, depth, velocity, hazard and duration	No. Different types of flooding are considered, but no consideration of joint or cumulative effects, nothing on speed of onset, velocity, hazard or duration.	Disagree.	The FRA considers all relevant flood sources, including fluvial, surface water, groundwater, sewer, reservoir and canal flooding. Depth, extent and likelihood information is provided using Environment Agency Product 4 data, NaFRA, published mapping, LiDAR review and site-specific modelling where relevant. Velocity, hazard, duration and speed of onset are considered where the flood mechanism and level of interaction justify detailed assessment. NPS EN-1 does not require whole-Scheme dynamic hydraulic modelling where that would be disproportionate. For panelled areas, whole-Scheme modelling would require assumed future values for ground cover, surface roughness, soil compaction, runoff coefficient and hydrological connectivity. These are management-dependent variables controlled by embedded mitigation, rather than fixed hydraulic parameters. Detailed modelling has been undertaken for Gauze Brook and further modelling is being progressed for Gabriel's Well because those locations involve direct Main River and floodplain interaction.	**ES Volume 3, Appendix 11-1 Flood Risk Assessment and Drainage Strategy Covering Report (Rev 2) [REP1-037]** Sections 2.2, 3.2 and 3.3 set out the flood source review and assessment method. Site-specific appendices: **ES Volume 3, Appendix 11-2 Flood Risk Assessment and Drainage Strategy Lime Down A (Rev 2) [REP1-039]** **ES Volume 3, Appendix 11-3 Flood Risk Assessment and Drainage Strategy Lime Down B (Rev 2) [REP1-041]** **ES Volume 3, Appendix 11-4 Flood Risk Assessment and Drainage Strategy Lime Down C1 (Rev 2) [REP1-043]** **ES Volume 3, Appendix 11-5 Flood Risk Assessment and Drainage Strategy Lime Down C2 (Rev 2) [REP1-045]** **ES Volume 3, Appendix 11-6 Flood Risk Assessment and Drainage Strategy Lime Down D (Rev 2) [REP1-047]** **ES Volume 3, Appendix 11-7 Flood Risk Assessment and Drainage Strategy Lime Down E1 (Rev 2) [REP1-049]** **ES Volume 3, Appendix 11-8 Flood Risk Assessment and Drainage Strategy Lime Down E2 (Rev 2) [REP1-051]** **ES Volume 3, Appendix 11-9 Flood Risk Assessment and Drainage Strategy Cable Route Corridor (Rev 2) [REP1-053]** Sections 2.2 to 2.8 assess each relevant flood source. **ES Volume 3, Appendix 11-6 Flood Risk Assessment and Drainage Strategy Lime Down D (Rev 2) [REP1-047]** Section 2.3 presents Gauze Brook modelling information. **9.28 Applicant's Response to Lead Local Flood Authority on Hydraulic Modelling Requirements [REP2-045]** and responses to FHW1.5 explain the modelling scope and use of Manning/open-channel calculations.
identify and secure opportunities to reduce the causes and impacts of flooding overall, making as much use as possible of natural flood management techniques as part of an	No. As it is assumed that the increase in flood risk will be minimal, little consideration has been given to reducing the impacts of flooding except round the BESS area.	Disagree.	The Scheme does not rely on catchment-scale natural flood management to be acceptable. The land is predominantly agricultural and does not present the same type of drainage betterment opportunity as redevelopment of a brownfield site with a positive drainage network. However, the Scheme embeds measures which reduce runoff pathways and sediment mobilisation relative to an arable baseline, including permanent vegetated cover, reduced soil disturbance during operation, soil protection, compaction control, watercourse buffers, maintenance of existing flow routes and SuDS for formal impermeable infrastructure. The	**ES Volume 3, Appendix 11-1 Flood Risk Assessment and Drainage Strategy Covering Report (Rev 2) [REP1-037]** Sections 3.2, 5 and 6 describe embedded hydrology, soil and drainage controls. **7.15 Outline Soil Resources Management Plan [APP-280]** secures soil handling, compaction control and reinstatement principles. **7.18 Outline Landscape and Ecological Management Plan [APP-283]** secures permanent ground cover and landscape/ecological management.

NPS EN-1 paragraph 5.8.15 requirement raised by SLD	SLD position	Agree / Disagree	Applicant's response	Specific signposting
integrated approach to flood risk management			Applicant is also considering wider community flood risk opportunities around Gauze Brook, but those are not required to make the Scheme acceptable in flood risk terms.	**7.11 Water Framework Directive Assessment (Rev 2) [REP1-094]** addresses baseline improvement measures and protection of watercourses. See response to FHW1.8.
consider the effects of a range of flooding events including extreme events on people, property, the natural and historic environment and river and coastal processes	No. Nothing on this at all. The Applicant has failed to demonstrate how impacts would be avoided or minimised.	Disagree.	The FRA considers a range of flood events and flood sources, including fluvial and surface water flooding, climate change allowances and residual extreme events. The assessment considers people and property through the review of off-site flood risk, existing receptors, safe operation and access, and the effect of the Scheme on floodplain storage, flow routes and downstream risk. The natural environment is addressed through the hydrology assessment, WFD Assessment, watercourse buffers, drainage strategy and pollution prevention controls. The Scheme is not located in a coastal setting, and coastal processes are not a relevant flood mechanism for this Scheme.	**ES Volume 3, Appendix 11-1 Flood Risk Assessment and Drainage Strategy Covering Report (Rev 2) [REP1-037]** Sections 2.2, 2.4, 3.2, 3.3 and 7 address flood sources, climate change, mitigation and residual risk. Site-specific appendices: **ES Volume 3, Appendix 11-2 Flood Risk Assessment and Drainage Strategy Lime Down A (Rev 2) [REP1-039]** **ES Volume 3, Appendix 11-3 Flood Risk Assessment and Drainage Strategy Lime Down B (Rev 2) [REP1-041]** **ES Volume 3, Appendix 11-4 Flood Risk Assessment and Drainage Strategy Lime Down C1 (Rev 2) [REP1-043]** **ES Volume 3, Appendix 11-5 Flood Risk Assessment and Drainage Strategy Lime Down C2 (Rev 2) [REP1-045]** **ES Volume 3, Appendix 11-6 Flood Risk Assessment and Drainage Strategy Lime Down D (Rev 2) [REP1-047]** **ES Volume 3, Appendix 11-7 Flood Risk Assessment and Drainage Strategy Lime Down E1 (Rev 2) [REP1-049]** **ES Volume 3, Appendix 11-8 Flood Risk Assessment and Drainage Strategy Lime Down E2 (Rev 2) [REP1-051]** **ES Volume 3, Appendix 11-9 Flood Risk Assessment and Drainage Strategy Cable Route Corridor (Rev 2) [REP1-053]** Sections 2.3, 2.4, 2.8, 2.9 and 2.11 address fluvial, surface water, design flood levels and residual risk where relevant. **7.11 Water Framework Directive Assessment (Rev 2) [REP1-094]** assesses water environment effects and mitigation.
include the assessment of the remaining (known as 'residual') risk after risk reduction measures have been taken into account and demonstrate that these risks can be safely managed, ensuring people will not be exposed to hazardous flooding	No. Residual risks are not assessed; they are simply assumed to have been mitigated by a set of possible measures. There can be no confidence that people will not be exposed to hazardous flooding.	Disagree.	Residual risk has been assessed following the incorporation of embedded mitigation. The Scheme design has followed an iterative approach, with flood risk controls embedded into siting, layout and design rather than added as separate mitigation after the assessment. This includes sequential siting of sensitive infrastructure, elevation and resilience of equipment where appropriate, watercourse buffers, flood-compatible panelled areas, restricted drainage discharge for formal impermeable infrastructure, soil management and construction/operational management controls. The residual risk assessment is therefore a with-embedded-mitigation assessment. It does not rely on uncommitted measures, and no further flood risk mitigation is required to avoid significant flood risk effects.	**ES Volume 3, Appendix 11-2 Flood Risk Assessment and Drainage Strategy Lime Down A (Rev 2) [REP1-039]** **ES Volume 3, Appendix 11-3 Flood Risk Assessment and Drainage Strategy Lime Down B (Rev 2) [REP1-041]** **ES Volume 3, Appendix 11-4 Flood Risk Assessment and Drainage Strategy Lime Down C1 (Rev 2) [REP1-043]** **ES Volume 3, Appendix 11-5 Flood Risk Assessment and Drainage Strategy Lime Down C2 (Rev 2) [REP1-045]** **ES Volume 3, Appendix 11-6 Flood Risk Assessment and Drainage Strategy Lime Down D (Rev 2) [REP1-047]** **ES Volume 3, Appendix 11-7 Flood Risk Assessment and Drainage Strategy Lime Down E1 (Rev 2) [REP1-049]** **ES Volume 3, Appendix 11-8 Flood Risk Assessment and Drainage Strategy Lime Down E2 (Rev 2) [REP1-051]** **ES Volume 3, Appendix 11-9 Flood Risk Assessment and Drainage Strategy Cable Route Corridor (Rev 2) [REP1-053]** Sections 2.8, 2.9, 2.10 and 2.11 address flood depths, residual risk and mitigation where relevant. **ES Volume 3, Appendix 11-1 Flood Risk Assessment and Drainage Strategy Covering Report (Rev 2) [REP1-037]** Sections 3.2, 3.3, 5, 6 and 7 set out embedded mitigation, drainage and residual risk.

NPS EN-1 paragraph 5.8.15 requirement raised by SLD	SLD position	Agree / Disagree	Applicant's response	Specific signposting
				3.1 Draft Development Consent Order (Rev 2) [REP1-007] Requirement 11 secures detailed drainage approval and related management plan requirements secure construction and operational controls.
Describe the existing surface water drainage arrangements for the site	Yes. In outline, but probably adequate.	Agree.	The Applicant agrees that this requirement is addressed. The existing Solar PV Sites comprise predominantly undeveloped agricultural land with no formal positive drainage network. Runoff discharges overland to local land drainage features, ordinary watercourses and Main Rivers, with local topography, ditches, watercourses and surface water pathways described in the site-specific assessments.	**ES Volume 3, Appendix 11-1 Flood Risk Assessment and Drainage Strategy Covering Report (Rev 2) [REP1-037]** Section 6.1 describes the existing drainage context. Site-specific appendices: **ES Volume 3, Appendix 11-2 Flood Risk Assessment and Drainage Strategy Lime Down A (Rev 2) [REP1-039]** **ES Volume 3, Appendix 11-3 Flood Risk Assessment and Drainage Strategy Lime Down B (Rev 2) [REP1-041]** **ES Volume 3, Appendix 11-4 Flood Risk Assessment and Drainage Strategy Lime Down C1 (Rev 2) [REP1-043]** **ES Volume 3, Appendix 11-5 Flood Risk Assessment and Drainage Strategy Lime Down C2 (Rev 2) [REP1-045]** **ES Volume 3, Appendix 11-6 Flood Risk Assessment and Drainage Strategy Lime Down D (Rev 2) [REP1-047]** **ES Volume 3, Appendix 11-7 Flood Risk Assessment and Drainage Strategy Lime Down E1 (Rev 2) [REP1-049]** **ES Volume 3, Appendix 11-8 Flood Risk Assessment and Drainage Strategy Lime Down E2 (Rev 2) [REP1-051]** **ES Volume 3, Appendix 11-9 Flood Risk Assessment and Drainage Strategy Cable Route Corridor (Rev 2) [REP1-053]** Sections 1.3 to 1.5 and 2.4 describe local hydrology, topography, drainage features and surface water pathways where relevant.
Set out (approximately) the existing rates and volumes of surface water run-off generated by the site. Detail the proposals for restricting discharge rates	No. No information on existing rates and volumes. Proposals for restricting discharge only for the BESS.	Disagree.	For undeveloped agricultural land, existing runoff is appropriately described as greenfield runoff. Field-wide runoff quantification is not required for the panelled areas because they do not form connected impermeable catchments and do not discharge to a positive drainage network. Quantitative runoff rates, attenuation volumes and restricted discharge rates are provided where the Scheme introduces formal impermeable infrastructure. Further high-level existing runoff rates and volumes for each site are provided in response to FHW1.3. Formal drainage areas will discharge at greenfield-equivalent or betterment rates, including the Wiltshire LLFA betterment principle where applicable.	**ES Volume 3, Appendix 11-1 Flood Risk Assessment and Drainage Strategy Covering Report (Rev 2) [REP1-037]** Section 6.4 sets out discharge control principles. **ES Volume 3, Appendix 11-6 Flood Risk Assessment and Drainage Strategy Lime Down D (Rev 2) [REP1-047]** Sections 3.3 and 3.4 set out BESS greenfield discharge and attenuation calculations. The updated Flood Risk Assessment and Outline Drainage Strategy documents to be submitted at Deadline 4 will include clearer site-specific drainage strategy sections and additional information provided in response to FHW1.3. **9.28 Applicant's Response to Lead Local Flood Authority on Hydraulic Modelling Requirements [REP2-045]** explains why field-wide runoff quantification for panelled areas is not required.
Set out proposals for managing and discharging surface water from the site using sustainable drainage systems and accounting for the predicted impacts of climate change. If sustainable drainage systems have been rejected, present clear evidence of why	Yes. But proposals are vague and in outline only. SuDS systems are not rejected.	Agree that the matter is addressed. Disagree that the information is inadequate.	SuDS proposals are provided at an outline level appropriate for DCO stage. SuDS have not been rejected. The outline drainage strategy identifies the drainage hierarchy, potential SuDS types, attenuation, discharge control, exceedance routing and climate change allowances for formal impermeable infrastructure. The final form, location and sizing of SuDS will be confirmed through detailed design and secured under Requirement 11. This is appropriate because final technology, levels, platform layouts, impermeable areas and outfall arrangements will be confirmed at detailed design. The documents will be retitled as Flood Risk Assessment and Outline Drainage Strategy documents at Deadline 4, with clearly labelled Outline Drainage Strategy sections. Engagement with the Environment Agency remains ongoing through the Statement of Common	**ES Volume 3, Appendix 11-1 Flood Risk Assessment and Drainage Strategy Covering Report (Rev 2) [REP1-037]** Sections 6.3 to 6.5 address the drainage hierarchy, SuDS options, discharge and exceedance principles. **ES Volume 3, Appendix 11-6 Flood Risk Assessment and Drainage Strategy Lime Down D (Rev 2) [REP1-047]** Sections 3.2 to 3.7 provide the most detailed current drainage strategy example for formal impermeable infrastructure. **3.1 Draft Development Consent Order (Rev 2) [REP1-007]** Requirement 11 secures detailed drainage approval. See FHW1.18.

NPS EN-1 paragraph 5.8.15 requirement raised by SLD	SLD position	Agree / Disagree	Applicant's response	Specific signposting
their inclusion would be inappropriate.			Ground process, and the Applicant will update the drainage documents at Deadline 4 to provide clearer signposting and additional drainage information.	
Demonstrate how the hierarchy of drainage options has been followed.	Yes.	Agree.	The Applicant agrees that this requirement is addressed. The drainage hierarchy is set out in the covering report and applied in the site-specific drainage strategies. Where infiltration is not feasible or is not appropriate due to ground conditions, groundwater or other constraints, restricted discharge to watercourse or existing drainage features is considered in accordance with the hierarchy.	**ES Volume 3, Appendix 11-1 Flood Risk Assessment and Drainage Strategy Covering Report (Rev 2) [REP1-037]** Section 6.3 sets out the drainage hierarchy and application to the Scheme. **ES Volume 3, Appendix 11-6 Flood Risk Assessment and Drainage Strategy Lime Down D (Rev 2) [REP1-047]** Section 3.2 applies the hierarchy to the BESS Area. Updated Outline Drainage Strategy sections will provide clearer signposting at Deadline 4.
Explain and justify why the types of SuDS and method of discharge have been selected and why they are considered appropriate	No. All options for SuDS types are left open.	Disagree.	This is addressed at outline design level. The drainage strategy identifies suitable SuDS options and discharge principles, while retaining appropriate flexibility over final components. That flexibility is necessary and proportionate at DCO stage because final levels, technology, layouts, impermeable areas, ground investigation and outfall details will be confirmed at detailed design. The detailed drainage strategy will need to demonstrate compliance with the hierarchy, climate change allowances, discharge restrictions, water quality treatment, exceedance and maintenance requirements. This is consistent with the National Standards for Sustainable Drainage Systems approach, which focuses on destination, volume, peak flow, water quality, amenity, biodiversity and long-term operation rather than fixing detailed components before detailed design.	**ES Volume 3, Appendix 11-1 Flood Risk Assessment and Drainage Strategy Covering Report (Rev 2) [REP1-037]** Sections 6.3 to 6.5 explain the drainage hierarchy, SuDS options, discharge method and design principles. **ES Volume 3, Appendix 11-6 Flood Risk Assessment and Drainage Strategy Lime Down D (Rev 2) [REP1-047]** Sections 3.5 and 3.6 identify proposed SuDS and exceedance principles for the BESS Area. **3.1 Draft Development Consent Order (Rev 2) [REP1-007]** Requirement 11 secures approval of the detailed drainage strategy.
Explain how sustainable drainage systems have been integrated with other aspects of the development such as open space or green infrastructure, so as to ensure an efficient use of the site.	No. No information about the spatial distribution or design of SuDS schemes.	Disagree.	The outline drainage strategy identifies SuDS options and their relationship with the Scheme layout. The precise spatial distribution and detailed design of SuDS will be confirmed at detailed design once final drainage locations, levels and outfalls are fixed. That is appropriate for a DCO-stage outline drainage strategy. The Applicant will also address the ExA's specific request in FHW1.3 regarding the addition of SuDS features to the Landscape and Ecology Mitigation Plans, so that drainage, landscape and ecology interfaces are appropriately coordinated.	**ES Volume 3, Appendix 11-1 Flood Risk Assessment and Drainage Strategy Covering Report (Rev 2) [REP1-037]** Sections 6.3 to 6.5 address SuDS options and outline drainage principles. **7.18 Outline Landscape and Ecological Management Plan [APP-283]** provides the landscape and ecological management context. See FHW1.3 for the proposed update to identify SuDS features on the Landscape and Ecology Mitigation Plans where relevant.
Describe the multifunctional benefits the sustainable drainage system will provide.	No.	Disagree.	This is addressed at outline level and will be expanded through the updated Outline Drainage Strategy sections. SuDS options such as swales, detention basins, ponds, filter drains and bioretention systems can provide multiple functions: attenuation and flow control, water quality treatment, conveyance, sediment capture, landscape integration and biodiversity habitat. For example, a detention basin or pond can attenuate runoff while also providing marginal planting, wetland habitat and ecological connectivity where this is compatible with safety, maintenance and operational requirements. The final multifunctional design will be confirmed at detailed design and coordinated with the landscape and ecological mitigation proposals.	**ES Volume 3, Appendix 11-1 Flood Risk Assessment and Drainage Strategy Covering Report (Rev 2) [REP1-037]** Section 6.3 identifies SuDS options. **ES Volume 3, Appendix 11-6 Flood Risk Assessment and Drainage Strategy Lime Down D (Rev 2) [REP1-047]** Section 3.5 identifies SuDS options for the BESS Area. **7.18 Outline Landscape and Ecological Management Plan [APP-283]** provides the landscape and ecological framework. See response to FHW1.3 for SuDS integration with the Landscape and Ecology Mitigation Plans.
Set out which opportunities to reduce the causes and impacts of flooding have been identified and included as part of the proposed sustainable drainage system.	No.	Disagree.	The proposed SuDS and drainage principles reduce potential flood risk impacts by restricting discharge from formal impermeable infrastructure to greenfield-equivalent or betterment rates, providing attenuation storage, managing exceedance and maintaining existing surface water flow routes. A specific example is the BESS Area, where runoff from formal impermeable infrastructure is collected, attenuated and discharged at a restricted rate rather than being released uncontrolled. Across the wider Scheme, permeable ground, vegetated cover, soil protection, compaction control and watercourse buffers reduce the potential for adverse runoff	**ES Volume 3, Appendix 11-1 Flood Risk Assessment and Drainage Strategy Covering Report (Rev 2) [REP1-037]** Sections 3.2, 3.3, 5 and 6 address embedded mitigation, soil management, drainage and runoff controls. **ES Volume 3, Appendix 11-6 Flood Risk Assessment and Drainage Strategy Lime Down D (Rev 2) [REP1-047]** Sections 3.3 to 3.7 provide an example of formal drainage attenuation and controlled discharge.

NPS EN-1 paragraph 5.8.15 requirement raised by SLD	SLD position	Agree / Disagree	Applicant's response	Specific signposting
			pathways compared with an unmanaged construction or operational scenario.	**9.28 Applicant's Response to Lead Local Flood Authority on Hydraulic Modelling Requirements [REP2-045]** explains the mechanism-specific approach to runoff and flood risk.
Explain how run-off from the completed development will be prevented from causing an impact elsewhere	No. It is simply assumed that there will not be any excess runoff.	Disagree.	This is not assumed. The assessment distinguishes between panelled areas and formal impermeable infrastructure. Panelled areas remain permeable and rainfall drains to ground. The risk mechanism is therefore controlled through vegetation establishment, soil compaction control, maintenance of surface flow connectivity and preservation of existing drainage pathways. Formal impermeable infrastructure is controlled through engineered drainage, attenuation, restricted discharge, water quality treatment and exceedance routing. The Scheme is not predicted to increase off-site flood risk. For formal drainage areas, discharge will be limited to the agreed restricted rates rather than released uncontrolled.	**ES Volume 3, Appendix 11-1 Flood Risk Assessment and Drainage Strategy Covering Report (Rev 2) [REP1-037]** Sections 3.3, 5 and 6 address panelled-area runoff, soil management and formal drainage controls. Site-specific appendices: **ES Volume 3, Appendix 11-2 Flood Risk Assessment and Drainage Strategy Lime Down A (Rev 2) [REP1-039]** **ES Volume 3, Appendix 11-3 Flood Risk Assessment and Drainage Strategy Lime Down B (Rev 2) [REP1-041]** **ES Volume 3, Appendix 11-4 Flood Risk Assessment and Drainage Strategy Lime Down C1 (Rev 2) [REP1-043]** **ES Volume 3, Appendix 11-5 Flood Risk Assessment and Drainage Strategy Lime Down C2 (Rev 2) [REP1-045]** **ES Volume 3, Appendix 11-6 Flood Risk Assessment and Drainage Strategy Lime Down D (Rev 2) [REP1-047]** **ES Volume 3, Appendix 11-7 Flood Risk Assessment and Drainage Strategy Lime Down E1 (Rev 2) [REP1-049]** **ES Volume 3, Appendix 11-8 Flood Risk Assessment and Drainage Strategy Lime Down E2 (Rev 2) [REP1-051]** **ES Volume 3, Appendix 11-9 Flood Risk Assessment and Drainage Strategy Cable Route Corridor (Rev 2) [REP1-053]** Sections 2.8 to 2.11 address residual risk, embedded mitigation and off-site flood risk. Updated Outline Drainage Strategy sections will be added at Deadline 4. **9.28 Applicant's Response to Lead Local Flood Authority on Hydraulic Modelling Requirements [REP2-045]** and response to FHW1.1 address SLD's panel runoff and reduced evaporation arguments.
Explain how the sustainable drainage system been designed to facilitate maintenance and, where relevant, adoption. Set out plans for ensuring an acceptable standard of operation and maintenance throughout the lifetime of the development.	No. Any plans that may exist are not presented. Only vague outline statements are available in the Outline Construction Environmental Management Plan, and reference made to a Water Management Plan which has yet to be produced.	Disagree.	Maintenance is addressed at outline level and will be fixed through the detailed drainage strategy and operational management controls. Adoption by a statutory undertaker is not expected and is not relied upon. The drainage system is expected to remain private and to be maintained by the Applicant or undertaker throughout the operational lifetime of the Scheme. Requirement 11 secures the detailed drainage strategy, including maintenance provisions. Operational inspection and maintenance will also be secured through the detailed OEMP. Decommissioning will be addressed through the detailed Decommissioning Strategy, including the removal, retirement or reinstatement of drainage features as appropriate at the end of the Scheme's operational life.	**ES Volume 3, Appendix 11-1 Flood Risk Assessment and Drainage Strategy Covering Report (Rev 2) [REP1-037]** Section 6 addresses drainage strategy and maintenance principles at outline level. **ES Volume 3, Appendix 11-6 Flood Risk Assessment and Drainage Strategy Lime Down D (Rev 2) [REP1-047]** Section 3.10 addresses BESS drainage maintenance at outline level. **3.1 Draft Development Consent Order (Rev 2) [REP1-007]** Requirement 11 secures detailed drainage approval. **7.13 Outline Operational Environmental Management Plan (Rev 3) [REP2-021]** secures operational monitoring, inspections and management controls. **7.14 Outline Decommissioning Strategy (Rev 2) [REP1-100]** secures decommissioning controls.
detail those measures that will be included to ensure the development will be safe and remain operational during a flooding event throughout the	No. Some of this is mentioned but the issue is not specifically discussed. The placing of panels in high flood risk areas raises questions over whether the scheme could operate in a flood event and its stability over a 60-year period.	Disagree.	This is addressed. More vulnerable infrastructure has been sequentially located in areas of lower flood risk where practicable. BESS and substations are located outside Flood Zones 2 and 3 where practicable and formal impermeable infrastructure is drained and attenuated. Drainage for formal impermeable infrastructure is designed to manage the 1 in 100 year event plus climate change, with exceedance routing considered for events above the design standard. Solar panels are elevated above existing ground levels, are flood-compatible infrastructure	**ES Volume 3, Appendix 11-1 Flood Risk Assessment and Drainage Strategy Covering Report (Rev 2) [REP1-037]** Sections 3.2, 3.3, 6 and 7 address sequential siting, flood resilience, drainage design and residual risk. Site-specific appendices: **ES Volume 3, Appendix 11-2 Flood Risk Assessment and Drainage Strategy Lime Down A (Rev 2) [REP1-039]**

NPS EN-1 paragraph 5.8.15 requirement raised by SLD	SLD position	Agree / Disagree	Applicant's response	Specific signposting
development's lifetime without increasing flood risk elsewhere			and do not materially obstruct flows or reduce floodplain storage. Electrical equipment in areas of residual flood risk will be designed with appropriate resilience, including freeboard where required. The Scheme is not predicted to increase flood risk elsewhere.	**ES Volume 3, Appendix 11-3 Flood Risk Assessment and Drainage Strategy Lime Down B (Rev 2) [REP1-041]** **ES Volume 3, Appendix 11-4 Flood Risk Assessment and Drainage Strategy Lime Down C1 (Rev 2) [REP1-043]** **ES Volume 3, Appendix 11-5 Flood Risk Assessment and Drainage Strategy Lime Down C2 (Rev 2) [REP1-045]** **ES Volume 3, Appendix 11-6 Flood Risk Assessment and Drainage Strategy Lime Down D (Rev 2) [REP1-047]** **ES Volume 3, Appendix 11-7 Flood Risk Assessment and Drainage Strategy Lime Down E1 (Rev 2) [REP1-049]** **ES Volume 3, Appendix 11-8 Flood Risk Assessment and Drainage Strategy Lime Down E2 (Rev 2) [REP1-051]** **ES Volume 3, Appendix 11-9 Flood Risk Assessment and Drainage Strategy Cable Route Corridor (Rev 2) [REP1-053]** Sections 2.9 to 2.11 address flood depths, safety and residual risk where relevant. **ES Volume 3, Appendix 11-6 Flood Risk Assessment and Drainage Strategy Lime Down D (Rev 2) [REP1-047]** Sections 2.3, 2.9 to 2.11 and 3 provide Gauze Brook and BESS-specific assessment. **3.1 Draft Development Consent Order (Rev 2) [REP1-007]** Requirement 11 secures detailed drainage approval.
identify and secure opportunities to reduce the causes and impacts of flooding overall during the period of construction	No. Some measures are discussed, but there is no integrated statement.	Disagree.	Construction-phase flood risk and runoff pathways are addressed through the Outline CEMP, Outline SRMP and the construction-stage Water Management Plan to be prepared as part of the detailed CEMP. The Water Management Plan will set out how temporary drainage, runoff from disturbed ground, silt and sediment control, existing flow routes, temporary crossings, watercourse protection, groundwater management, contingency measures and exceedance flows will be managed during construction. Soil compaction and reinstatement risks will be managed through the SRMP. These controls reduce the causes and impacts of construction-phase runoff and sediment mobilisation.	**ES Volume 3, Appendix 11-1 Flood Risk Assessment and Drainage Strategy Covering Report (Rev 2) [REP1-037]** Sections 3.2 and 5 address construction-phase runoff and soil management. **7.12 Outline Construction Environmental Management Plan (Rev 3) [REP2-019]** Table 5 secures hydrology, flood risk and drainage construction controls and the Water Management Plan. **7.15 Outline Soil Resources Management Plan [APP-280]** secures soil management and reinstatement controls. **3.1 Draft Development Consent Order (Rev 2) [REP1-007]** Requirement 13 secures the detailed CEMP. See response to FHW1.9.
be supported by appropriate data and information, including historical information on previous events.	No. Very little data is presented. Historical research is limited to the Environment Agency's historical flood maps, which are incomplete. There is a large amount of unused information on flooding in the Bristol Avon catchment.	Disagree.	The assessment is supported by appropriate data and information, including Environment Agency Flood Map for Planning, Product 4 data, historic flood mapping, NaFRA surface water mapping, LiDAR, BGS and MAGIC mapping, WFD data, local hydrology, topographic review and consultation with the Environment Agency and LLFA. The Environment Agency records supplied through Product 4 were considered and included in the assessment. SLD's reliance on river flow gauge data and anecdotal evidence does not displace the proportionate evidence base used in the FRA, and does not demonstrate a requirement for whole-Scheme dynamic hydraulic modelling. Baseline data and modelling scope have been discussed with the Environment Agency and Wiltshire Council LLFA through consultation and the Statements of Common Ground. Where further clarification or updates are being made, these are identified in the Applicant's responses, including FHW1.3 and FHW1.5.	**ES Volume 3, Appendix 11-1 Flood Risk Assessment and Drainage Strategy Covering Report (Rev 2) [REP1-037]** Sections 1.3 and 3.4 identify data sources and consultation. Site-specific appendices: **ES Volume 3, Appendix 11-2 Flood Risk Assessment and Drainage Strategy Lime Down A (Rev 2) [REP1-039]** **ES Volume 3, Appendix 11-3 Flood Risk Assessment and Drainage Strategy Lime Down B (Rev 2) [REP1-041]** **ES Volume 3, Appendix 11-4 Flood Risk Assessment and Drainage Strategy Lime Down C1 (Rev 2) [REP1-043]** **ES Volume 3, Appendix 11-5 Flood Risk Assessment and Drainage Strategy Lime Down C2 (Rev 2) [REP1-045]** **ES Volume 3, Appendix 11-6 Flood Risk Assessment and Drainage Strategy Lime Down D (Rev 2) [REP1-047]** **ES Volume 3, Appendix 11-7 Flood Risk Assessment and Drainage Strategy Lime Down E1 (Rev 2) [REP1-049]** **ES Volume 3, Appendix 11-8 Flood Risk Assessment and Drainage Strategy Lime Down E2 (Rev 2) [REP1-051]**

NPS EN-1 paragraph 5.8.15 requirement raised by SLD	SLD position	Agree / Disagree	Applicant's response	Specific signposting
				ES Volume 3, Appendix 11-9 Flood Risk Assessment and Drainage Strategy Cable Route Corridor (Rev 2) [REP1-053] Sections 1 and 2, together with supporting annexes, include site-specific baseline information, flood source review and Environment Agency data. **ES Volume 1, Chapter 11 Hydrology, Flood Risk and Drainage (Rev 2) [REP1-017]** Table 11-1 records consultation. **9.28 Applicant's Response to Lead Local Flood Authority on Hydraulic Modelling Requirements [REP2-045]** addresses the modelling evidence base. Responses to FHW1.3 and FHW1.5 confirm further clarification and figure updates.

Note: references reflect the current Examination Library at the time of drafting and should be updated if Deadline 4 retitled Flood Risk Assessment and Outline Drainage Strategy documents receive new reference numbers or paragraph references change.

Annex C LV1.1 – Landscape Fabric – Quantifying Loss and Provision

Table 1 Loss of Landscape Fabric Components

	Loss quantity	References
Item 1 - Loss of landscape fabric components		
Hedgerows	327m within PV Sites	A Hedgerow Removal Plan showing anticipated permanent hedgerow losses is provided in the Outline EPMS [EN10168/APP/7.19] [APP-284].
Trees	3 (1 group, 2 Trees) trees within PV Sites And 201 (69 Groups, 132 Trees) within Cable Route Corridor It is anticipated that, as the design is refined and micrositing of the CRC is progressed, the extent of arboricultural feature removal will be reduced wherever practicable.	Full details of tree impacts is provided within Chapter 10 Arboriculture [EN10168/APP/6.1] [APP-062].

Table 2 Additional landscape components including mitigation and enhancement measures (As set out within Table 8-18 of the LVIA [APP-060])

Broad Category Type	Subcategory Type	Area / Length / Number
Proposed Ground Cover	Existing Vegetation to be Retained and Enhanced	24.04
	Proposed Grassland Creation (Beneath Panels)	452.44
	Proposed Tussock Grassland Margins	64.48
	Proposed Damp Grassland	18.53

Broad Category Type	Subcategory Type	Area / Length / Number
	Proposed Ground Nesting Bird Mitigation - Set Aside	63.29
	Proposed Diverse Wildflower Meadow	66.08
	Proposed Low Density Scrub	13.95
Total:		702.80 ha
Green Corridor and Woodland Planting	Proposed Native Woodland Belt	7.07
	Proposed Native Woodland Block	3.76
	Proposed Scrub and Tree Planting (On Bund)	0.62
Total:		11.45 ha
Enhanced Native Riparian Planting	Proposed Riparian Corridor	7.78
Total:		7.78 ha
Hedgerow Reinforcement and Roadside Reinforcement	Hedgerow Reinforcement	45.63
	Proposed Linear Tree Planting	9.31
Total:		54.94 km
Proposed Hedgerows	Proposed Native Hedgerow with Trees	15.49
Total:		15.49 km
Reintroduction of Historic Ponds and New Ponds	Indicative New Pond Locations	1
	Ghost Pond Locations	13
Total:		14

Table 3 Extent of proposed planting under Table 2 (above) that would be required for the purpose of mitigating adverse landscape and visual effects

Broad Category Type	Subcategory Type	Area / Length / Number
Proposed Ground Cover	Existing Vegetation to be Retained and Enhanced	23.48
	Proposed Grassland Creation (Beneath Panels)	452.44
	Proposed Tussock Grassland Margins	64.48
	Proposed Damp Grassland	18.53
	Proposed Ground Nesting Bird Mitigation - Set Aside	16.11
	Proposed Diverse Wildflower Meadow	17.28
	Proposed Low Density Scrub	5.68
Total:		**598 ha**
Green Corridor and Woodland Planting	Proposed Native Woodland Belt	7.07
	Proposed Native Woodland Block	3.76
	Proposed Scrub and Tree Planting (On Bund)	0.62
Total:		**11.45 ha**
Enhanced Native Riparian Planting	Proposed Riparian Corridor	7.78
Total:		**7.78 ha**
Hedgerow Reinforcement and Roadside Reinforcement	Hedgerow Reinforcement	40.43
	Proposed Linear Tree Planting	7.19
Total:		**47.62 km**

Broad Category Type	Subcategory Type	Area / Length / Number
Proposed Hedgerows	Proposed Native Hedgerow with Trees	15.1
Total:		**15.1 km**
Reintroduction of Historic Ponds and New Ponds	Indicative New Pond Locations	1
	Ghost Pond Locations	5
Total:		**6**

Table 4 Extent of proposed planting under item 2 (above) that would be for enhancement only (Refer to attached Figure showing extent of Enhancement)

Broad Category Type	Subcategory Type	Area / Length / Number for Enhancement
Proposed Ground Cover	Existing Vegetation to be Retained and Enhanced	0.56
	Proposed Grassland Creation (Beneath Panels)	0.00
	Proposed Tussock Grassland Margins	0.00
	Proposed Damp Grassland	0.00
	Proposed Ground Nesting Bird Mitigation - Set Aside	47.18
	Proposed Diverse Wildflower Meadow	48.80
	Proposed Low Density Scrub	8.27
Total:		**104.80 ha**
	Proposed Native Woodland Belt	0.00
	Proposed Native Woodland Block	0.00

Broad Category Type	Subcategory Type	Area / Length / Number for Enhancement
Green Corridor and Woodland Planting	Proposed Scrub and Tree Planting (On Bund)	0.00
Total:		**0 ha**
Enhanced Native Riparian Planting	Proposed Riparian Corridor	0.00
Total:		**0 ha**
Hedgerow Reinforcement and Roadside Reinforcement	Hedgerow Reinforcement	5.20
	Proposed Linear Tree Planting	2.12
Total:		**7.32 km**
Proposed Hedgerows	Proposed Native Hedgerow with Trees	0.39
Total:		**0.39 km**
Reintroduction of Historic Ponds and New Ponds	Indicative New Pond Locations	0.00
	Ghost Pond Locations	8.00
Total:		**8**

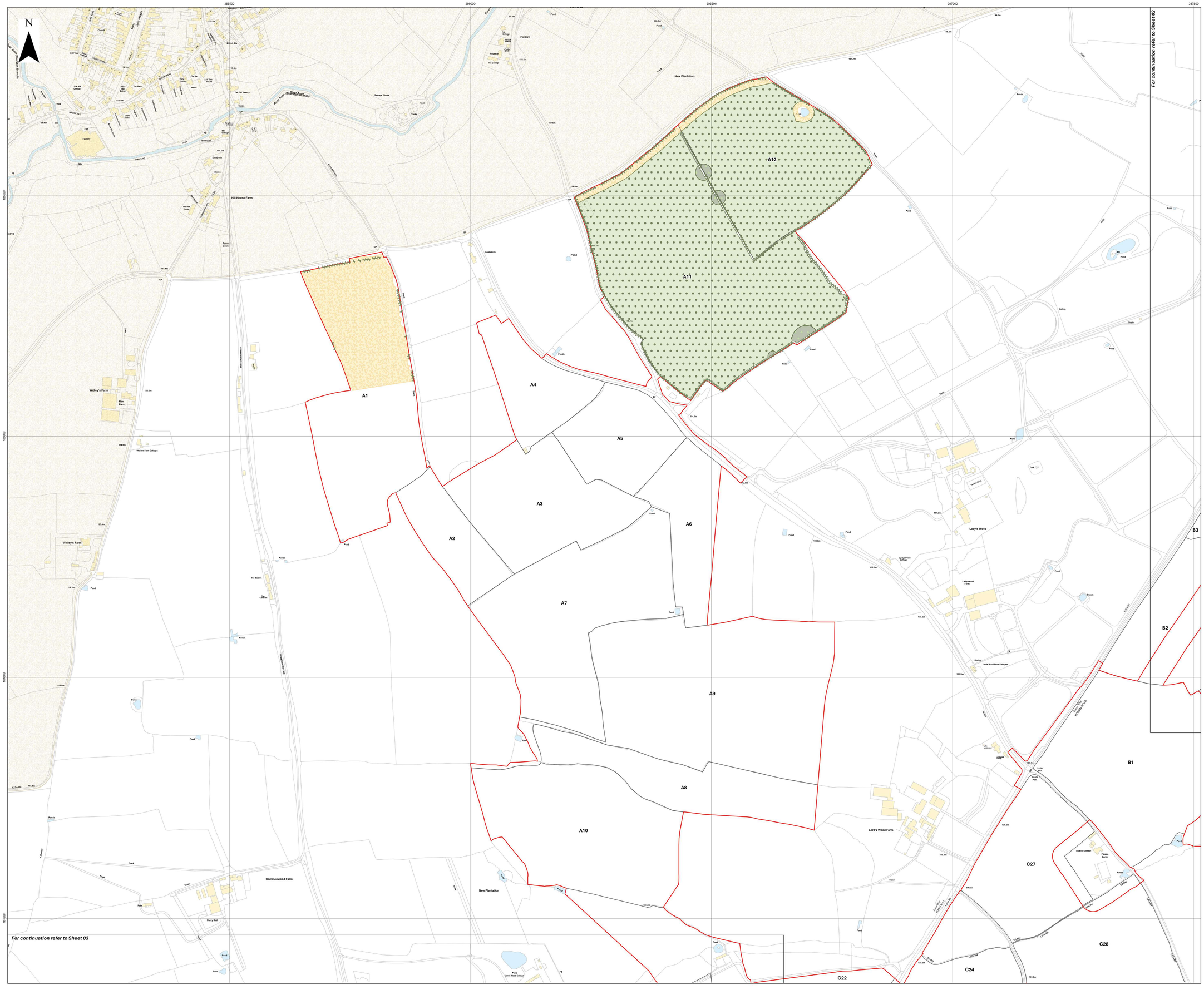
Table 5 Approximate planting quantities of the additional landscape components including mitigation and enhancement measures

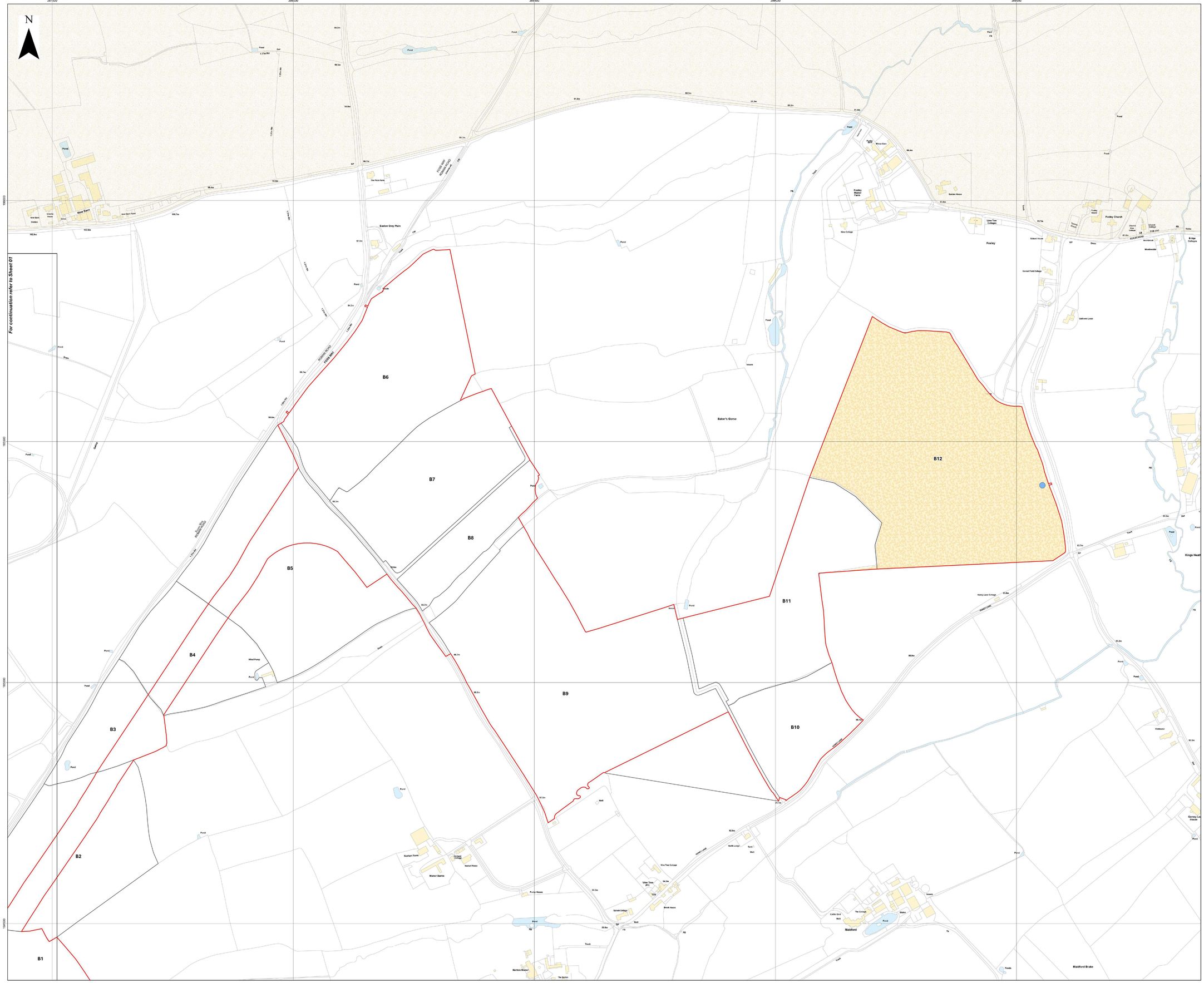
Broad Category Type	Subcategory Type	Area / Length / Number	Approximate Planting Density referenced in the Outline Landscape and Ecological Management Plan [EN10168/APP/7.18]	Approximate Quantity of Planting (Accurate quantities to be calculated at post consent stage)
Proposed Ground Cover	Existing Vegetation to be Retained and Enhanced	24.04	N/A	N/A
	Proposed Grassland Creation (Beneath Panels)	452.44	N/A	N/A
	Proposed Tussock Grassland Margins	64.48	N/A	N/A
	Proposed Damp Grassland	18.53	N/A	N/A
	Proposed Ground Nesting Bird Mitigation - Set Aside	63.29	N/A	N/A
	Proposed Diverse Wildflower Meadow	66.08	N/A	N/A
	Proposed Low Density Scrub	13.95	N/A	N/A
Total:		**702.80 ha**	**N/A**	**N/A**
Green Corridor and Woodland Planting	Proposed Native Woodland Belt	7.07	Woodland and shelterbelt planting referenced in paragraph 1.3.50 of OLEMP: “Trees within woodland copses and shelterbelts will be planted at 1 m centres.”	70,700 trees
	Proposed Native Woodland Block	3.76	Woodland and shelterbelt planting referenced in paragraph 1.3.50 of OLEMP:	37,600 trees

Broad Category Type	Subcategory Type	Area / Length / Number	Approximate Planting Density referenced in the Outline Landscape and Ecological Management Plan [EN10168/APP/7.18]	Approximate Quantity of Planting (Accurate quantities to be calculated at post consent stage)
			"Trees within woodland copses and shelterbelts will be planted at 1 m centres."	
	Proposed Scrub and Tree Planting (On Bund)	0.62	N/A	N/A
Total:		11.45 ha	N/A	**108,300 trees**
Enhanced Native Riparian Planting	Proposed Riparian Corridor	7.78	Proposed Riparian corridor planting referenced in paragraph 1.3.59 of OLEMP: "Shrub planting will be planted at 1 m centres to form a dense lower canopy. Scattered trees will be planted at 5–11 m centres."	6,200 shrubs 248 trees at 5 m centres or 51 trees at 11 m centres
Total:		7.78 ha	N/A	**6,200 shrubs** **248 trees at 5 m centres or** **51 trees at 11 m centres**
Hedgerow Reinforcement and Roadside Reinforcement	Hedgerow Reinforcement	45.63	N/A	N/A – Accurate gaps and planting spec for existing hedgerow reinforcement to be calculated at post consent stage
	Proposed Linear Tree Planting	9.31	Hedgerow tree planting referenced in paragraph	Minimum of 1,035 trees.

Broad Category Type	Subcategory Type	Area / Length / Number	Approximate Planting Density referenced in the Outline Landscape and Ecological Management Plan [EN10168/APP/7.18]	Approximate Quantity of Planting (Accurate quantities to be calculated at post consent stage)
			1.3.36 in the OLEMP: "All newly planted hedgerows will include Select Standard trees randomly spaced between 5–9 m centres."	Maximum of 1,862 trees
Total:		54.94 km	N/A	**Minimum of 1,035 trees.** **Maximum of 1,862 trees**
Proposed Hedgerows	Proposed Native Hedgerow with Trees	15.49	Hedgerow Planting referenced in Paragraph 1.3.25 of OLEMP: "All new hedgerows and infill planting will comprise of a double staggered row of plants 400 mm apart within each row; overall, six plants per linear metre." Hedgerow tree planting referenced in paragraph 1.3.36 in the OLEMP: "All newly planted hedgerows will include Select Standard trees randomly spaced between 5–9 m centres."	92,940 hedgerow plants. Hedgerow Trees: Minimum of: 1,722 trees Maximum of: 3,098 trees

Broad Category Type	Subcategory Type	Area / Length / Number	Approximate Planting Density referenced in the Outline Landscape and Ecological Management Plan [EN10168/APP/7.18]	Approximate Quantity of Planting (Accurate quantities to be calculated at post consent stage)
Total:		15.49 km	N/A	**92,940 hedgerow plants.** **Hedgerow Trees:** **Minimum of: 1,722 trees** **Maximum of: 3,098 trees**
Reintroduction of Historic Ponds and New Ponds	Indicative New Pond Locations	1	N/A	N/A
	Ghost Pond Locations	13	N/A	N/A
Total:		14	N/A	N/A


N
385500
386000
386500
387000
387500
For continuation refer to Sheet 02
For continuation refer to Sheet 03
A1
A2
A3
A4
A5
A6
A7
A8
A9
A10
A11
A12
B1
B2
B3
C22
C24
C27
C28
Widley's Farm
Commonwood Farm
Hill House Farm
Lord's Wood Farms
Lady's Wood
New Plantation
Forlorn
Ladywood College
Ladywood Farm
Leeds Wood Farm Cottages
Quarr Farm
Quarr Abbey
Pond
Ponds
Track
Drain
Spring
Tank
Gallop
Stony Bed
Quarr Abbey Ruins (Scheduled Monument)
Quarr Abbey Ruins (Scheduled Monument)
Quarr Abbey Ruins (Scheduled Monument)



Island GREEN POWER

Lanpro

Key

- Order Limits
- Sheet Index
- National Landscape
- Proposed Wildflower Meadow and Verges
- Proposed Locations for Reintroduction of Historic Ponds

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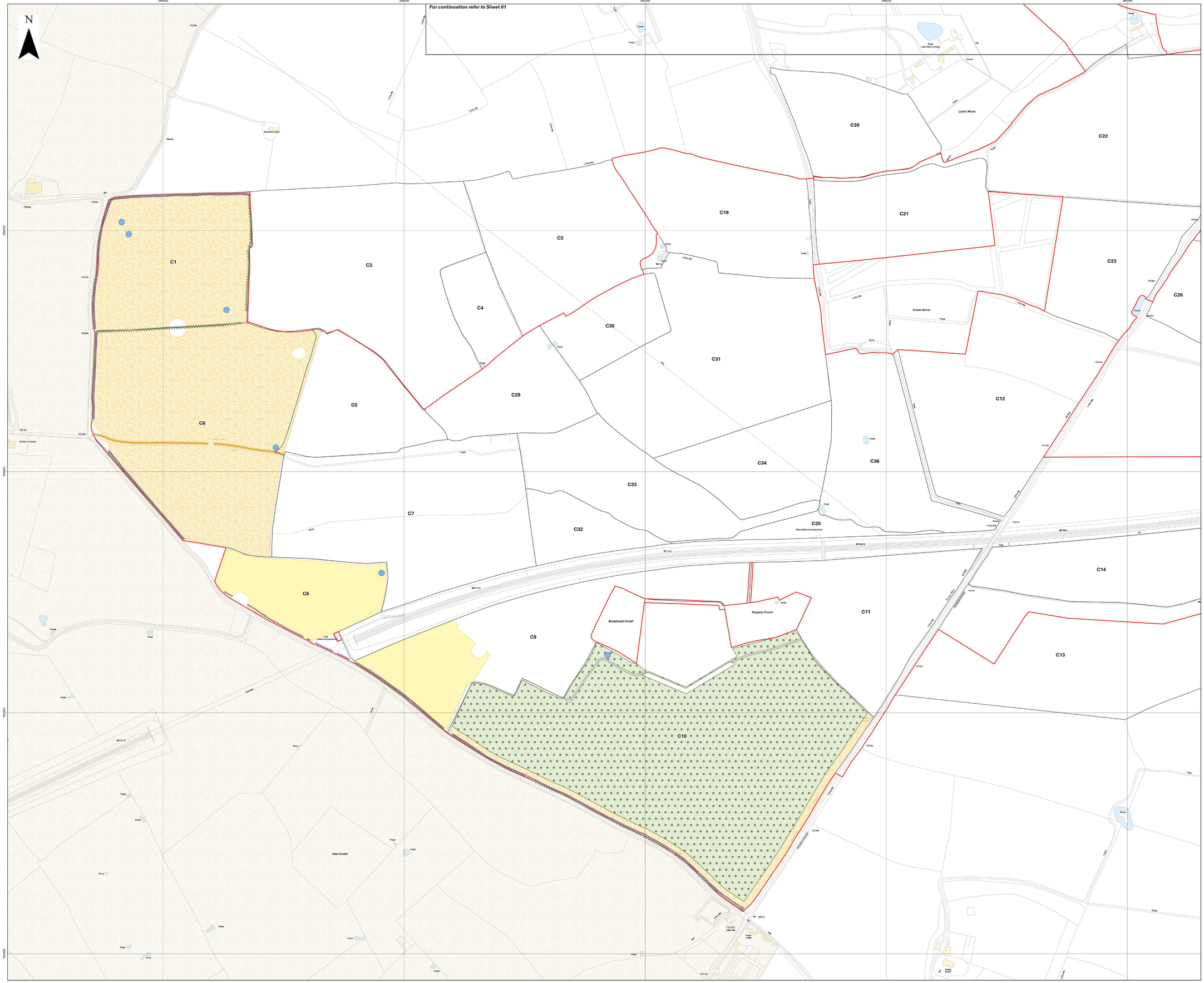
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APFP Regulation: 5(2)(o)	Application Doc No. EN010168/EXAM/2.7
Ref: P4443_LPR_ZZ_XX_DR_Z_EXA_0371	Date: 11/06/2026
Drawn by: BH	Checked by: JB

Enhancement within the setting of the Cotswolds National Landscape

Sheet 2 of 3
Revision A

Lime Down Solar Park



Key

- Order Limits
- Sheet Index
- National Landscape
- Enhancement of Existing Hedgerows
- Ecological Enhancement - Proposed Ground Nesting Bird Mitigation - Set Aside
- Proposed New Hedgerow
- Proposed Linear Tree Planting
- Proposed Low Density Scrub
- Proposed Wildflower Meadow and Verges
- Proposed Locations for Reintroduction of Historic Ponds

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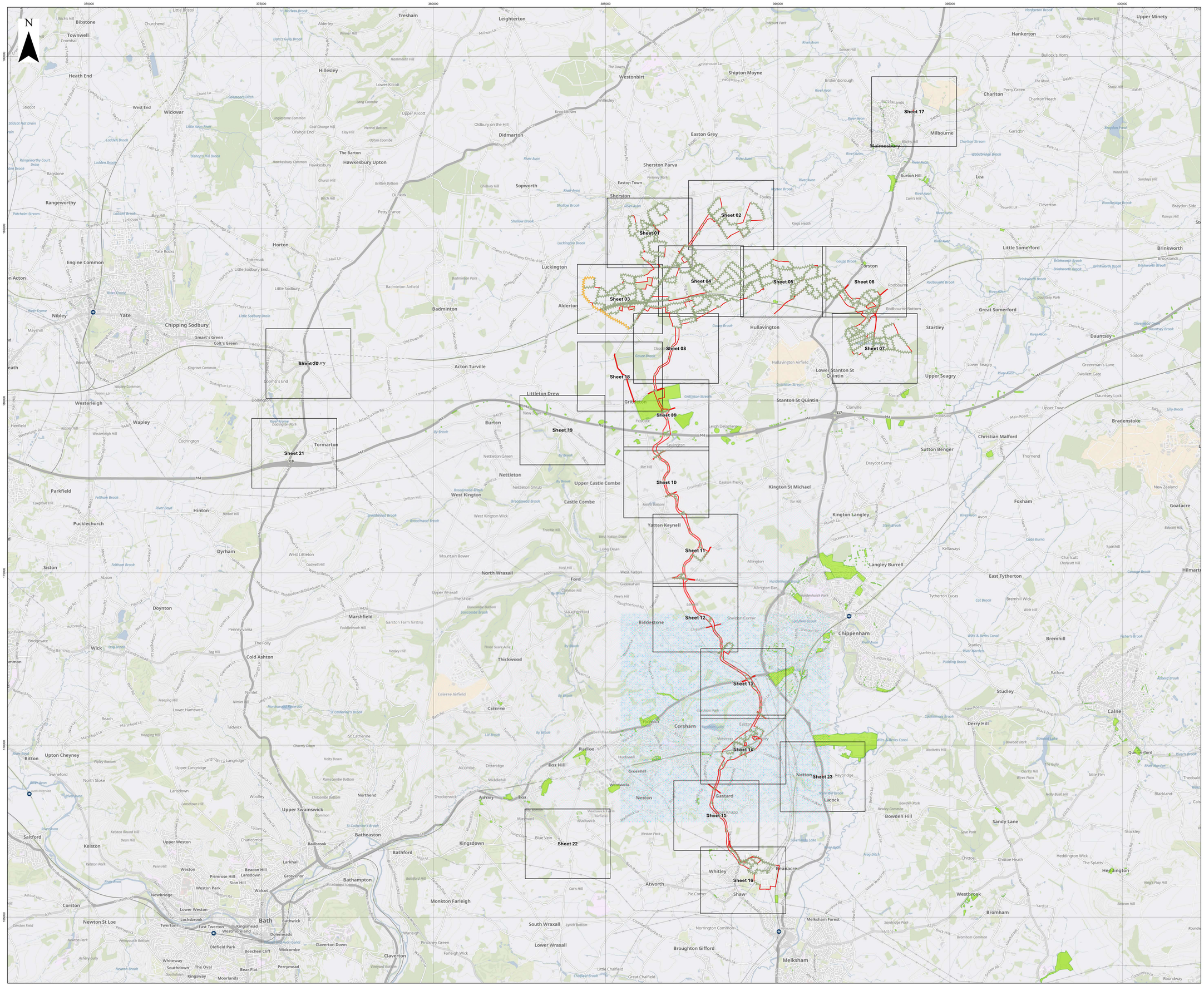
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Ref: P4443_LPR_ZZ_XX_DR_Z_EXA_0371	Date: 11/06/2026
Drawn by: BH	Checked by: JB

Enhancement within the setting of the Cotswolds National Landscape

Sheet 3 of 3
Revision A

Lime Down Solar Park

Annex D LV1.3 – Hedgerow Height Plan



Island GREEN POWER

Lanpro

Key

- Order Limits
- Index Sheet
- Hedgerows to be managed at 4.5m height
- Hedgerows managed at c1.5m (or as existing if greater)
- Tree Preservation Order (TPO)

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0 1 2 3 4 km

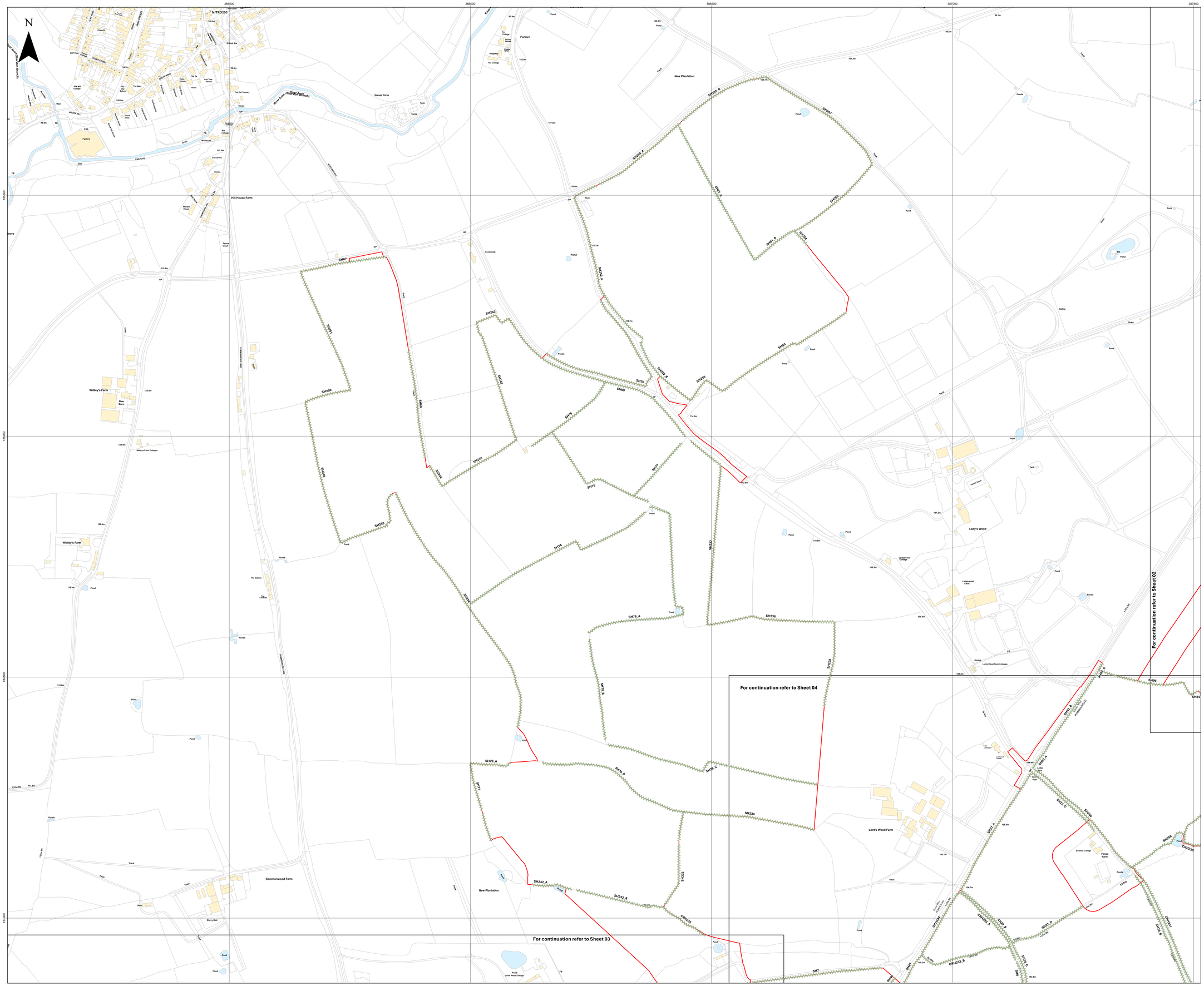
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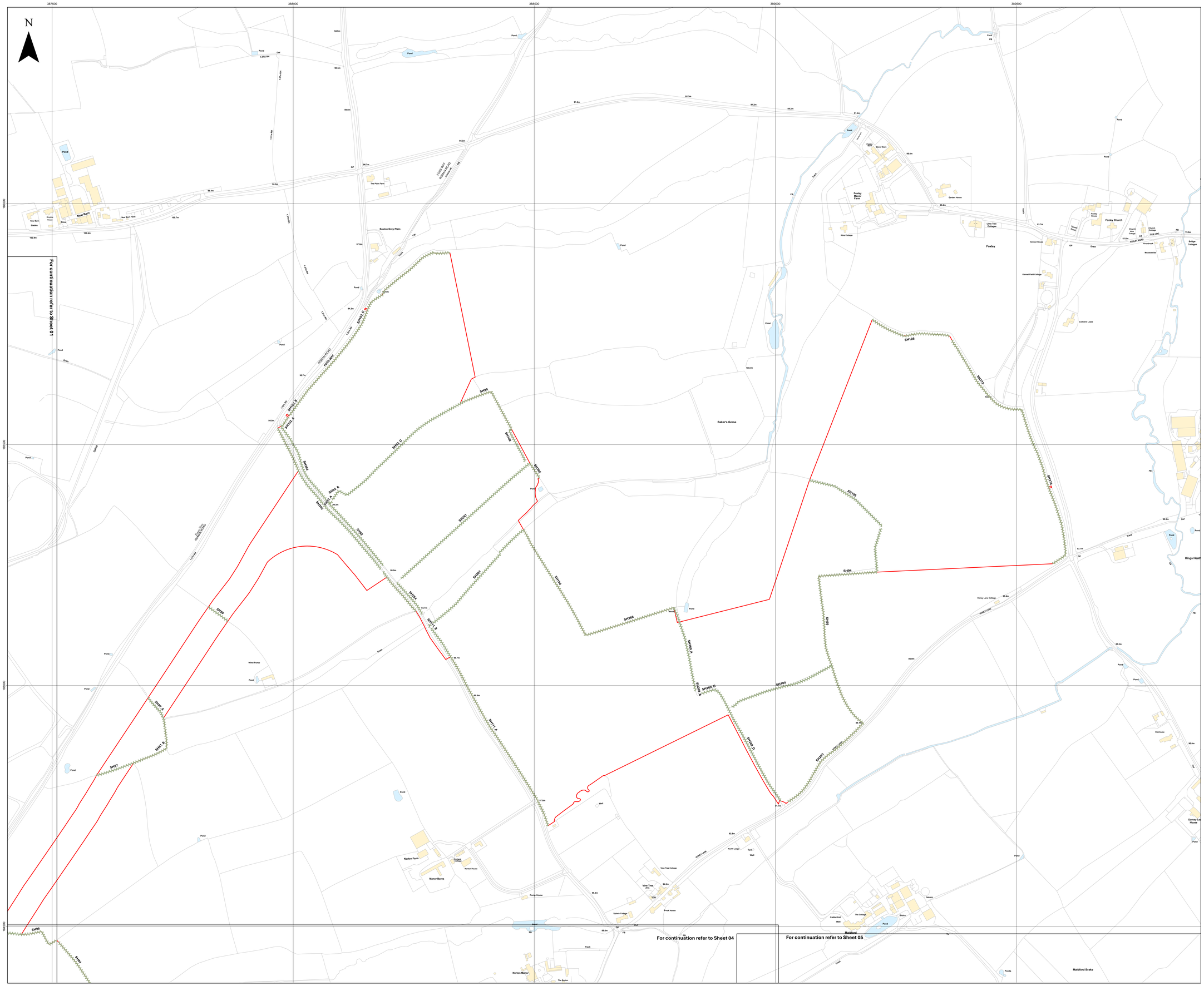
APFP Regulation: 5(2)(o)	Application Doc No. EN010168/EXAM/2.7
Ref: P4443_LPR_ZZ_XX_DR_Z_EXA_0369	Date: 08/06/2026
Drawn by: BH	Checked by: JB

Hedgerow Height Plan

Index Plan
Revision A

Lime Down Solar Park


N
385500
386000
386500
387000
387500
185500
185000
184500
184000
N/TPO253
Hill House Farm
Widley's Farm
Commonwood Farm
New Plantation
Lord's Wood Farm
Lady's Wood
Forlorn
Southfields
Sewage Works
Brook Farm
Lodsworth Cricket Club
Lodsworth Primary School
Lodsworth Village Hall
Lodsworth Footpath 1
Lodsworth Footpath 2
Lodsworth Footpath 3
Lodsworth Footpath 4
Lodsworth Footpath 5
Lodsworth Footpath 6
Lodsworth Footpath 7
Lodsworth Footpath 8
Lodsworth Footpath 9
Lodsworth Footpath 10
Lodsworth Footpath 11
Lodsworth Footpath 12
Lodsworth Footpath 13
Lodsworth Footpath



Island GREEN POWER

Lanpro

Key

- Order Limits
- Sheet Index
- Hedgerows to be managed at 4.5m height

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0 100 200 300 Metres

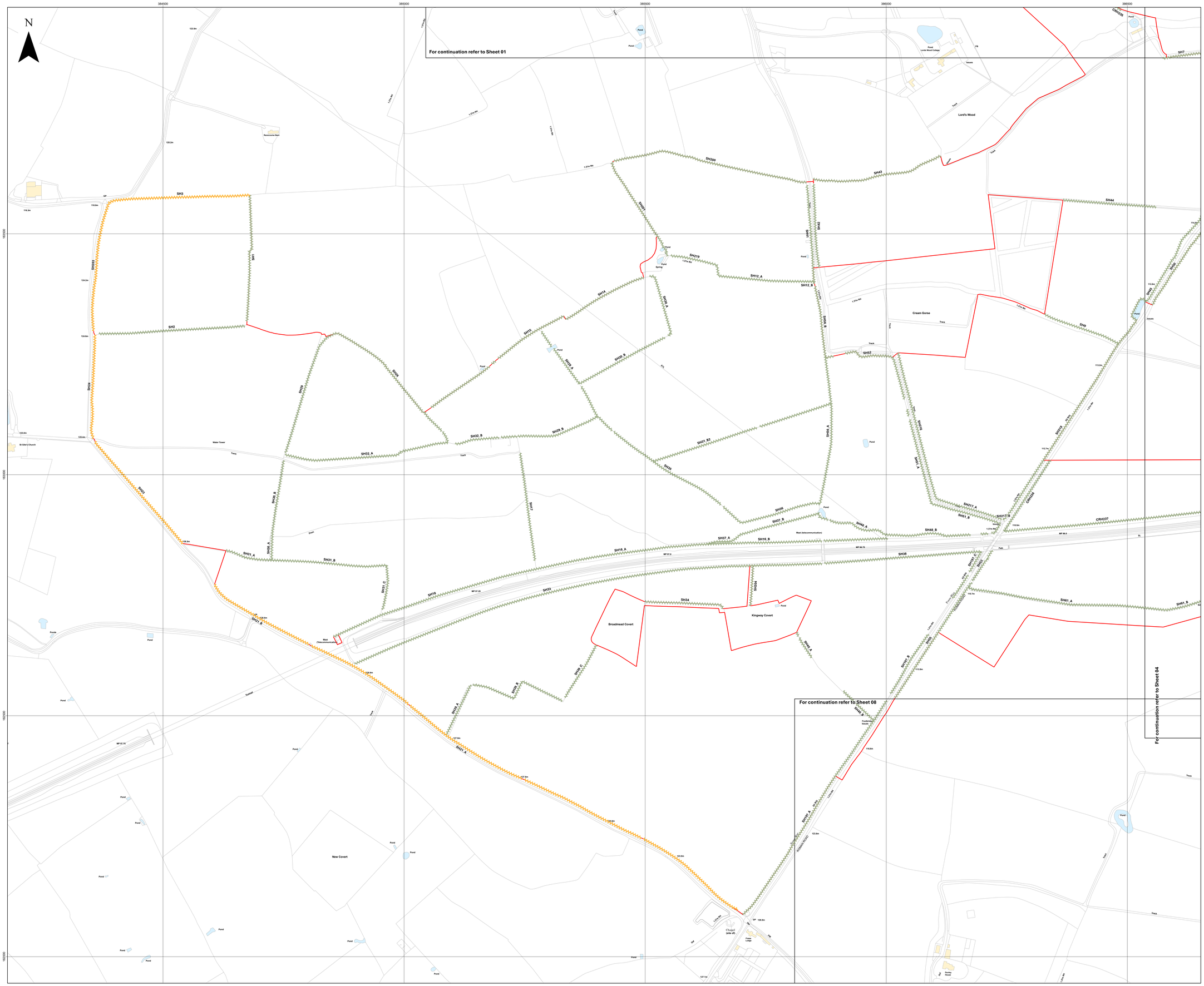
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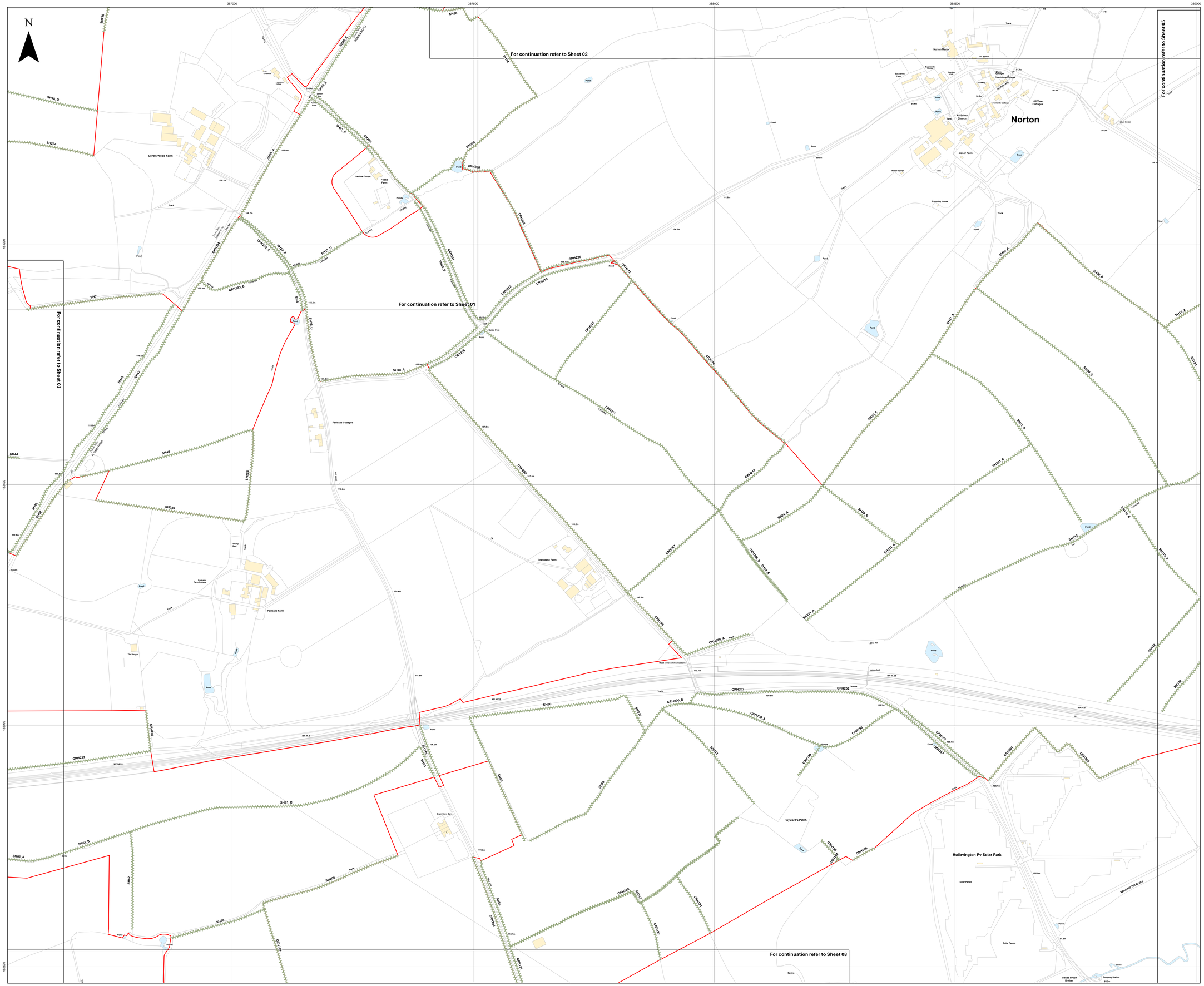
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Drawn by: BH	Checked by: JB

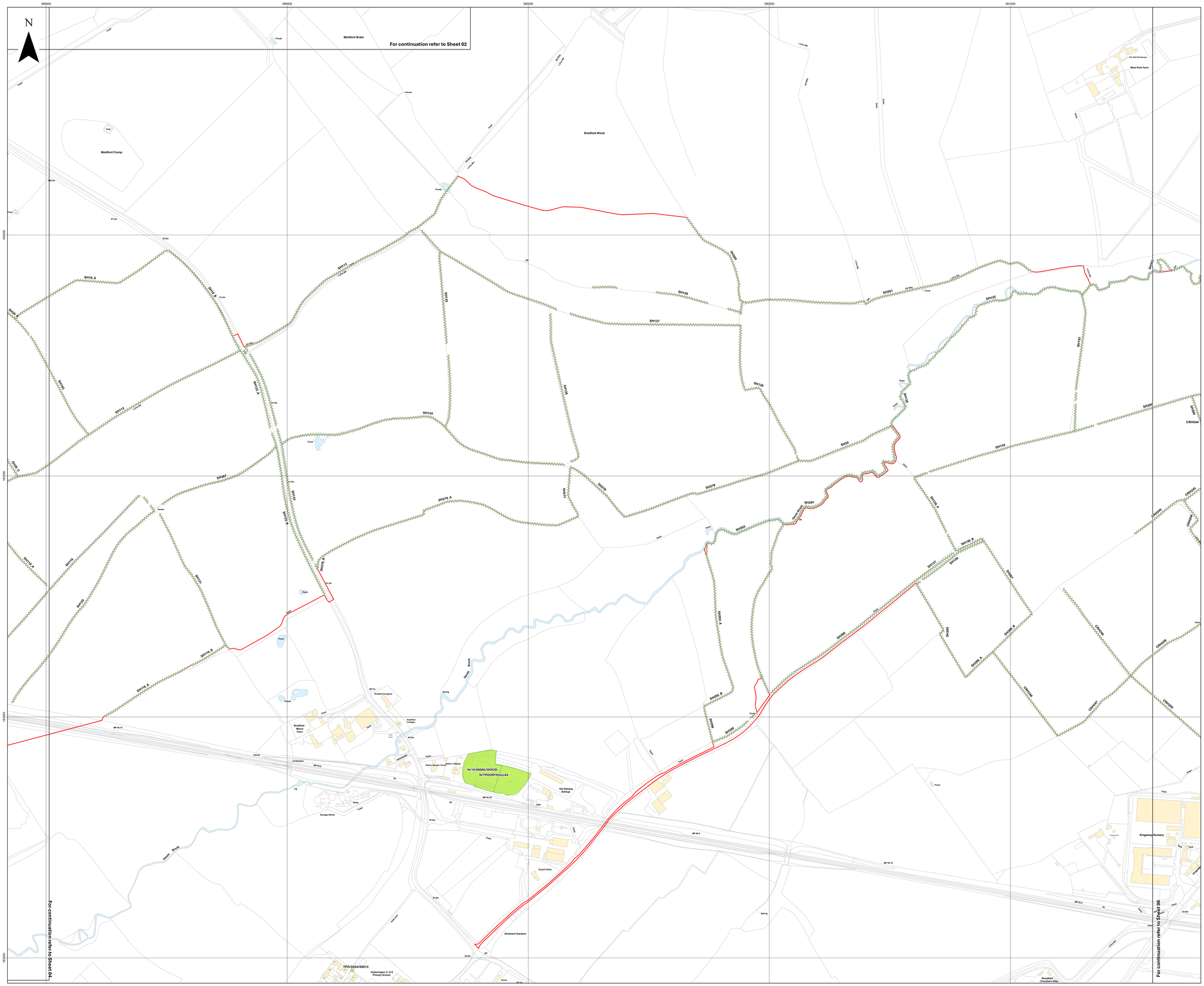
Hedgerow Height Plan

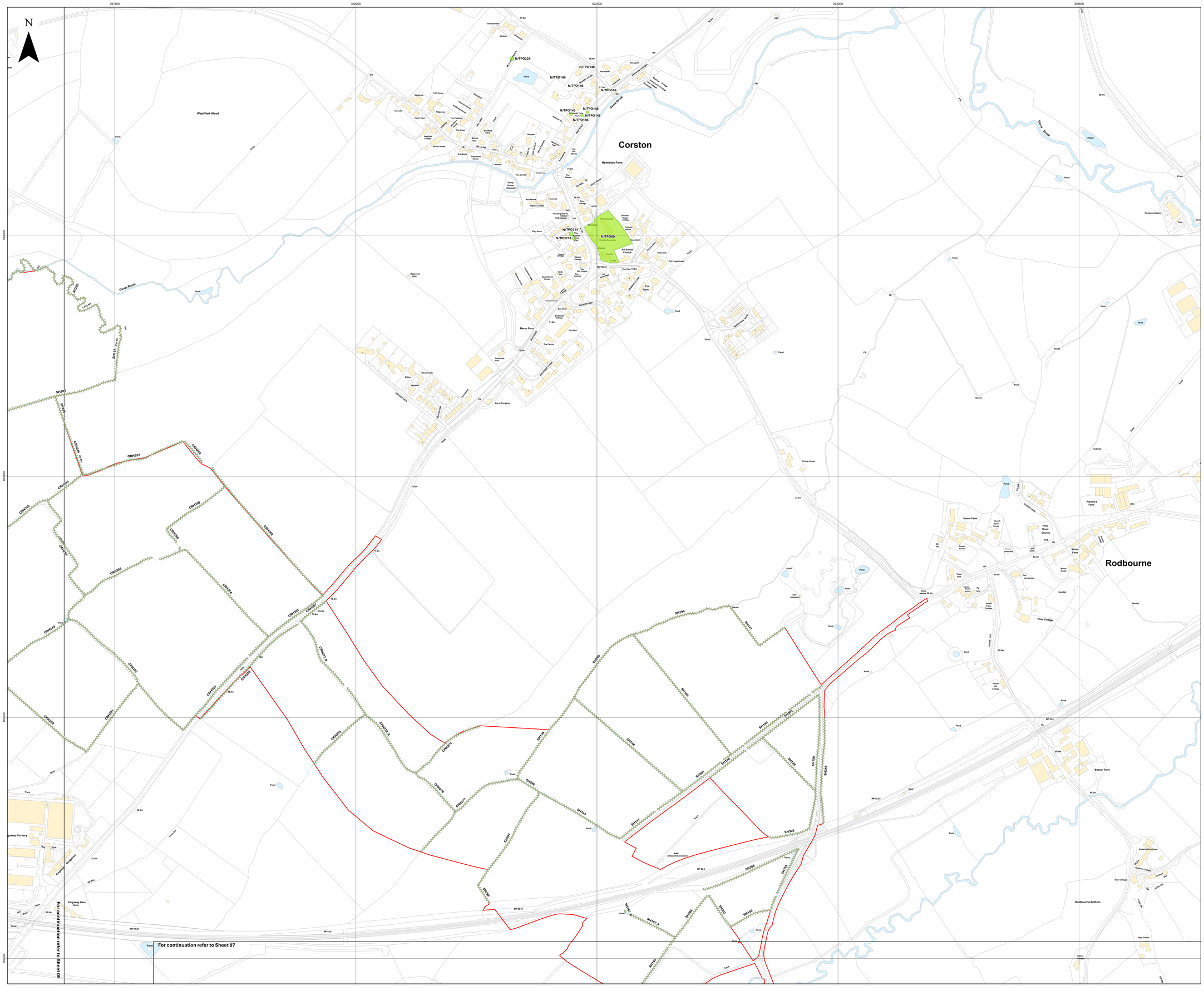
Sheet 2 of 23
Revision A

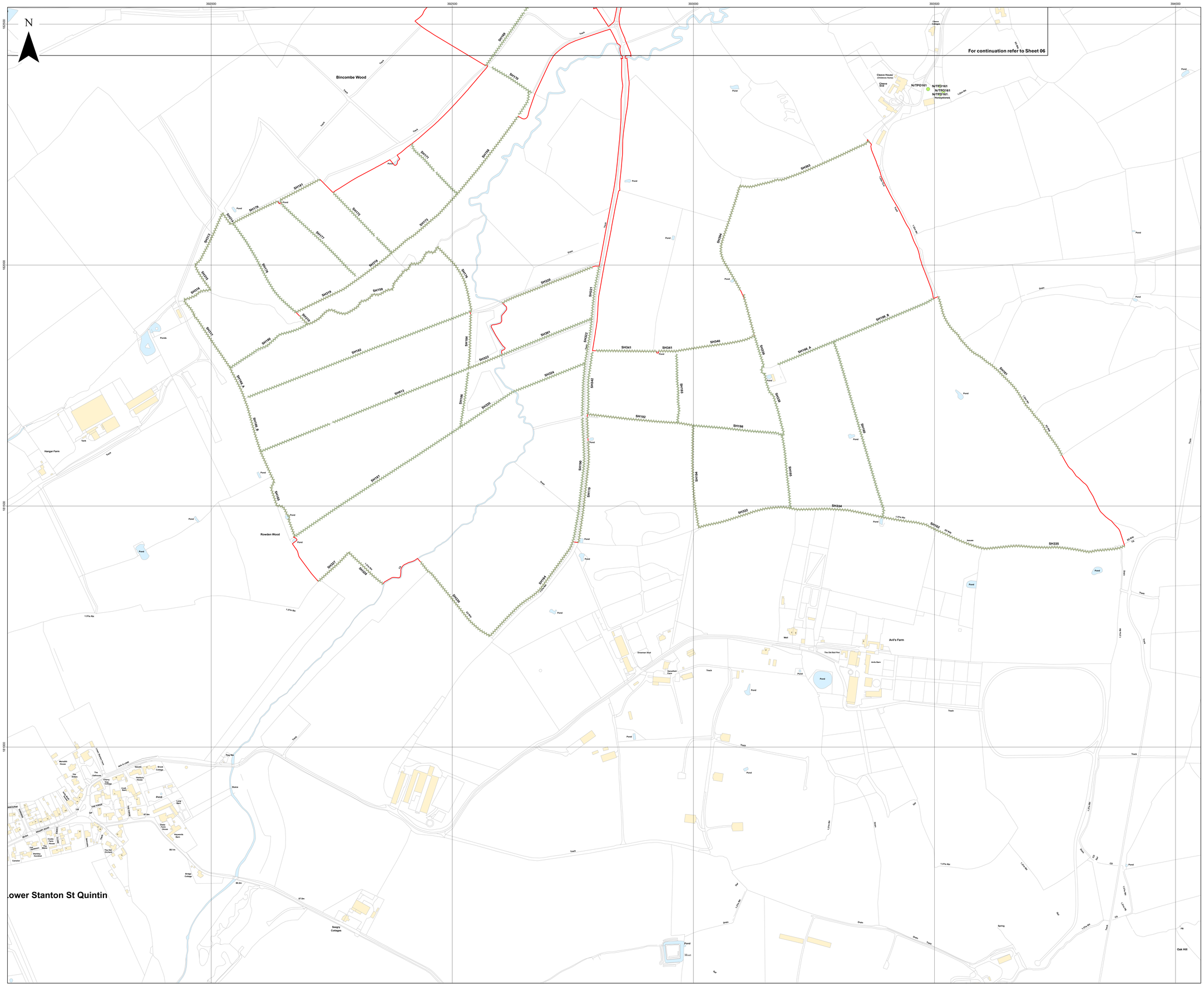
Lime Down Solar Park

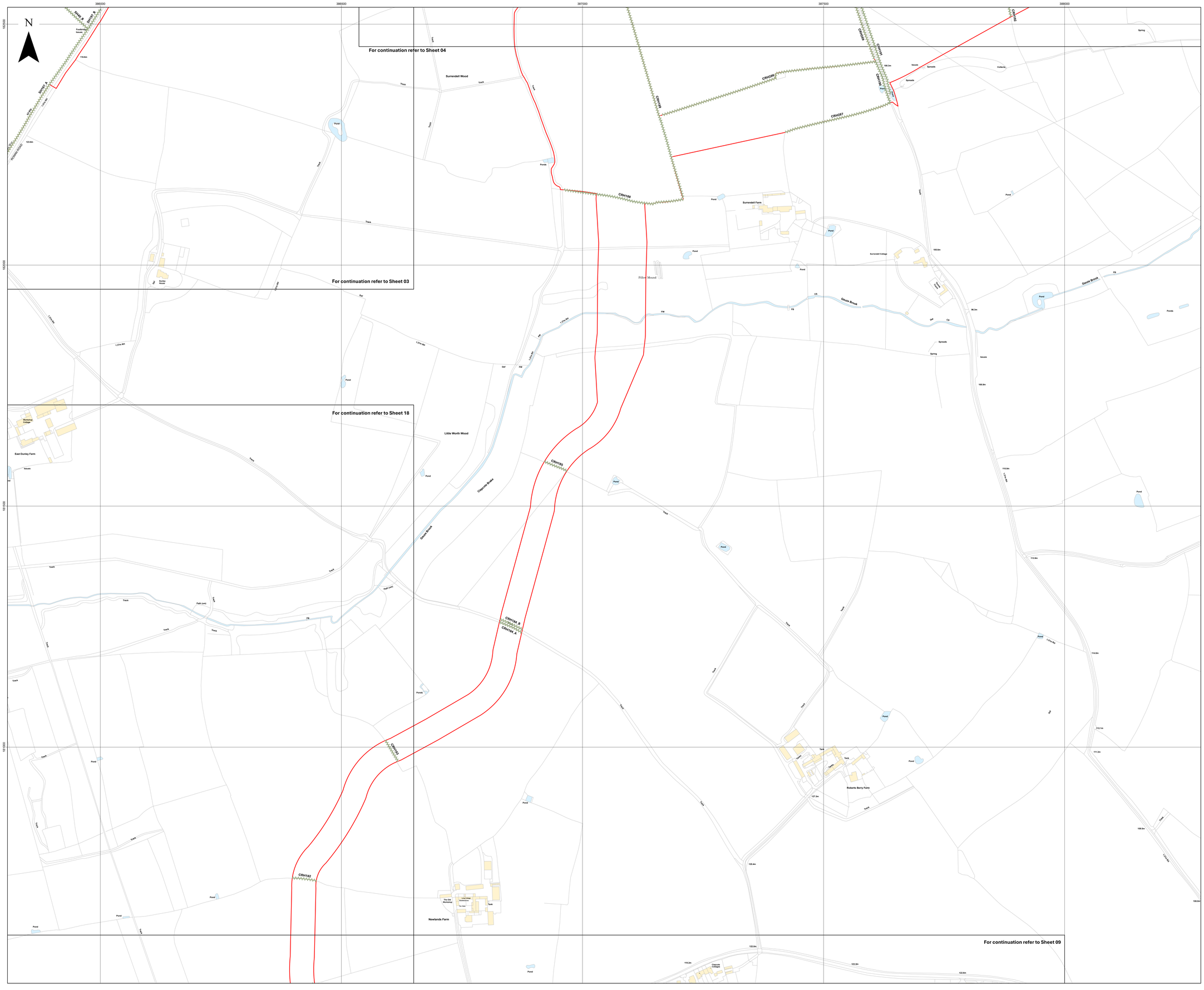

384500
385000
385500
386000
386500
183000
182500
182000
N
For continuation refer to Sheet 01
For continuation refer to Sheet 08
For continuation refer to Sheet 04
SH3
SH2
SH23
SH24
SH32
SH1
SH29
SH28
SH32_A
SH32_B
SH28_B
SH31
SH14
SH15
SH25_A
SH28_A
SH28_C
SH12_A
SH12_B
SH219
SH200
SH201
SH43
SH44
SH45
SH46
SH49
SH50
SH52
SH31_A
SH31_B
SH36
SH37_A
SH37_B
SH16_A
SH16_B
SH33
SH34
SH35
SH16_C
SH16_D
SH16_E
SH31_C
SH31_D
SH31_E
SH31_F
SH31_G
SH31_H
SH31_I
SH31_J
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SH31_XJ
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SH31_YB
SH31_YC
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SH31_YI
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SH31_YS
SH31_YT
SH31_YU
SH31_YV
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CRH336
CRH337
CRH338
Broadmead Covert
Kingway Covert
New Covert
Cream Gorse
Lord's Wood
Rascecorne Barn
St Giles's Church
Chapel (site of)
Forge Lodge
Dunley House
Pond
Ponds
Spring
Track
Drain
Water Tower
Tunnel
West (Telecommunication)
Footpath
Bridleway
Restricted Byway
Path
Trees
Scrub
Hedge
Fence
Wall
Ditch
Bank
Quarry
Level
Tank
Mast
Telecom
Pylon
Gate
Stile
Post
Sign
Bench
Seat
Shelter
Building
Farm
Cottage
Church
Chapel
Tower
Bridge
Culvert
Weir
Sluice
Lock
Dam
Reservoir
Lake
River
Stream
Brook
Creek
Marsh
Swamp
Bog
Heath
Moor
Meadow
Pasture
Arable
Woodland
Forest
Plantation
Orchard
Vineyard
Allotment
Garden
Park
Recreation
Sports
Golf
Cemetery
Graveyard
Memorial
Monument
Statue
Fountain
Well
Spring
Pump
Tank
Silo
Barn
Stable
Kennel
Pen
Enclosure
Compound
Yard
Road
Lane
Track
Path
Footpath
Bridleway
Restricted Byway
Byway
Cycleway
Pavement
Kerb
Verge
Central Reservation
Roundabout
Junction
Crossroads
Traffic Island
Bus Stop
Bus Station
Railway
Station
Platform
Signal
Level Crossing
Tunnel
Bridge
Viaduct
Aqueduct
Canal
Lock
Weir
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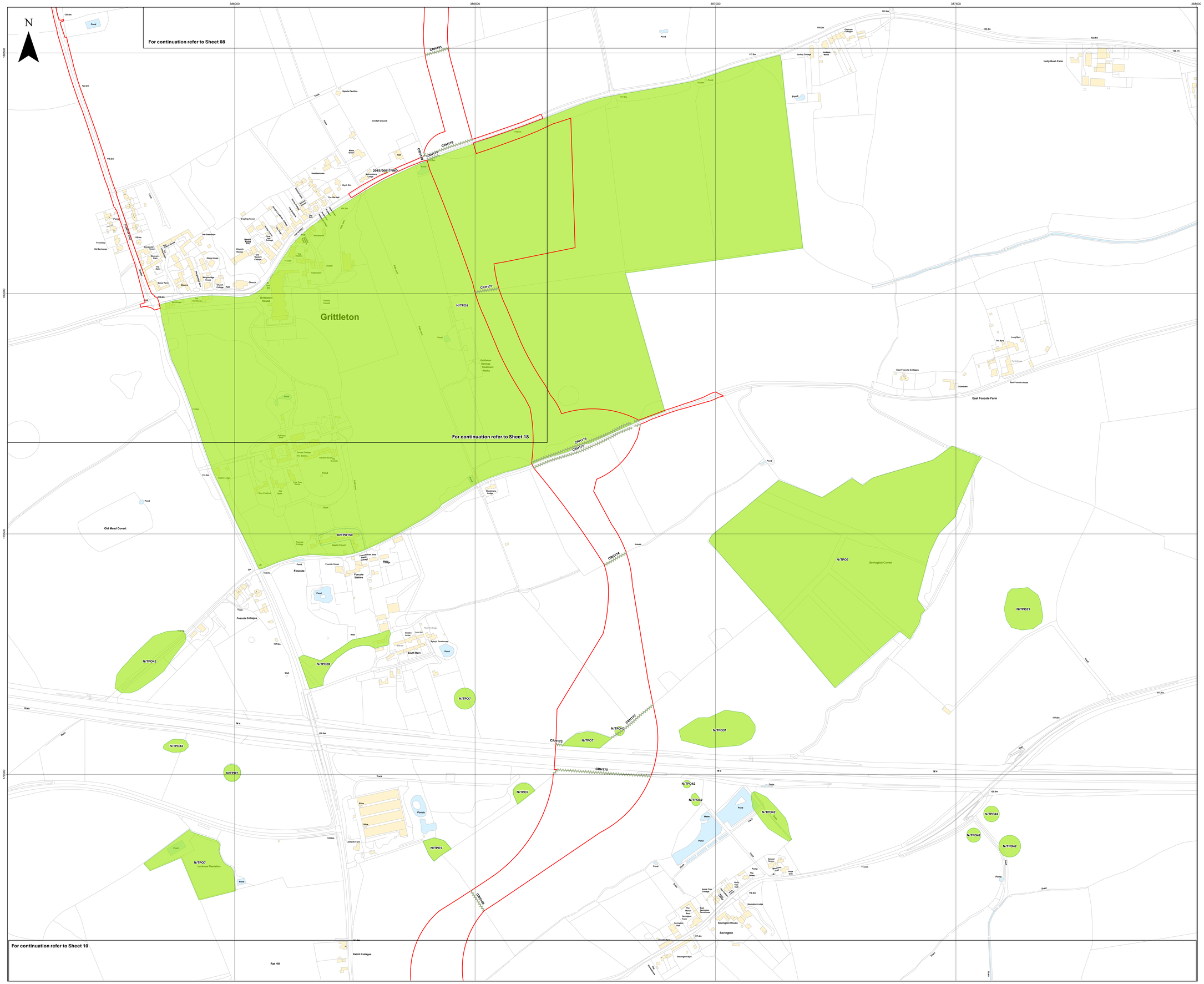

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Norton
Norton Manor
All Saints' Church
Manor Farm
Lord's Wood Farm
Fosse Farm
Farleaze Farm
Farleaze Cottages
Townlease Farm
Hullavington Pv Solar Park
Hayward's Patch
Gauze Brook Bridge
Windmill Hill Bridge
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SH78_C
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SH27_B
SH27_C
SH27_D
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SH38_A
SH38_B
SH38_C
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SH61_C
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Maidford Clump
Bradfield Wood
Ponds
Tank
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Pond
West Park Farm
The Old Farmhouse
Bradfield Manor Farm
Bradfield Bungalow
Bradfield College
Station Keepers House
Station Cottages
Old Railway Sidings
Court Farm
Allotment Gardens
Kingsway Nursery
Hulkerington C of E Primary School
Rosefield (Travellers Site)
Sewage Works
Tanks
Underpass
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Quoss Brook
Grove Brook
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Bincombe Wood
Rowden Wood
Lower Stanton St Quintin
Axil's Farm
Clavere House
Clavere Cottages
Clavere End
Hangar Farm
Ponds
Pond
Track
Lane
Drain
Stream
Quarry
Tank
Spring
Well
Sluice
Pegg Stile
Oak Hill
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CRH191
CRH192
CRH193
CRH194 A
CRH194 B
CRH195
SH197 A
SH197 B
SH198
Surrendell Wood
Surrendell Farm
Surrendell Cottage
Pillbox Mound
Little Worth Wood
East Dunley Farm
Dunley House
Workshop Cottage
Newlands Farm
The Old Workshop
Long Cottage
The Yews
Roberts Barry Farm
Chaucrie Cottages
Ouzels Brook
Cleave Brook
Claucrie Brook
Track
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Key

- Order Limits
- Sheet Index
- Hedgerows to be managed at 4.5m height
- Tree Preservation Order (TPO)

Layers: Lanpro, 2026; IGP, 2026
Base map: Reproduced from Ordnance Survey digital map data © Crown copyright 2026. All rights reserved. License number 0100031673

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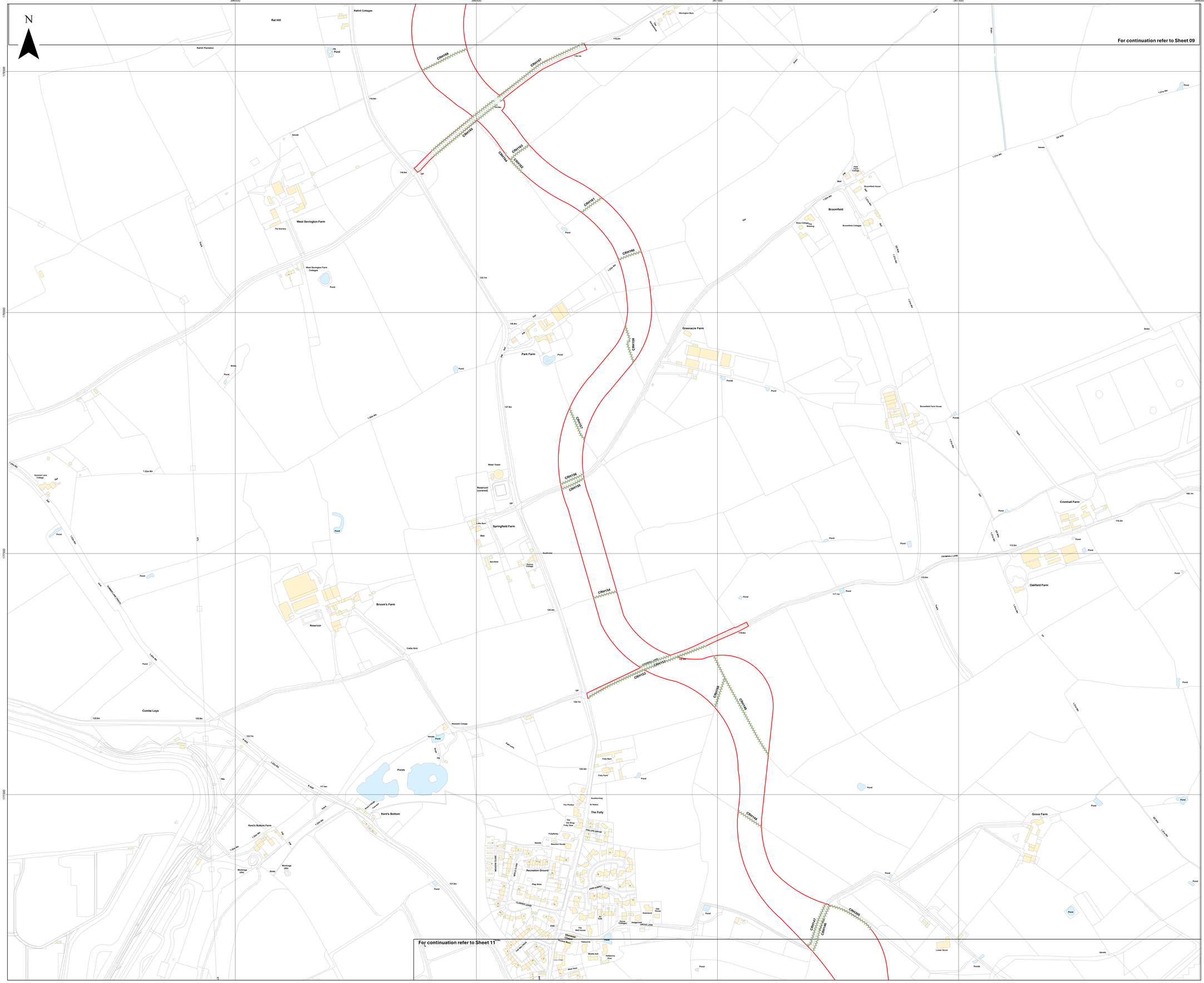
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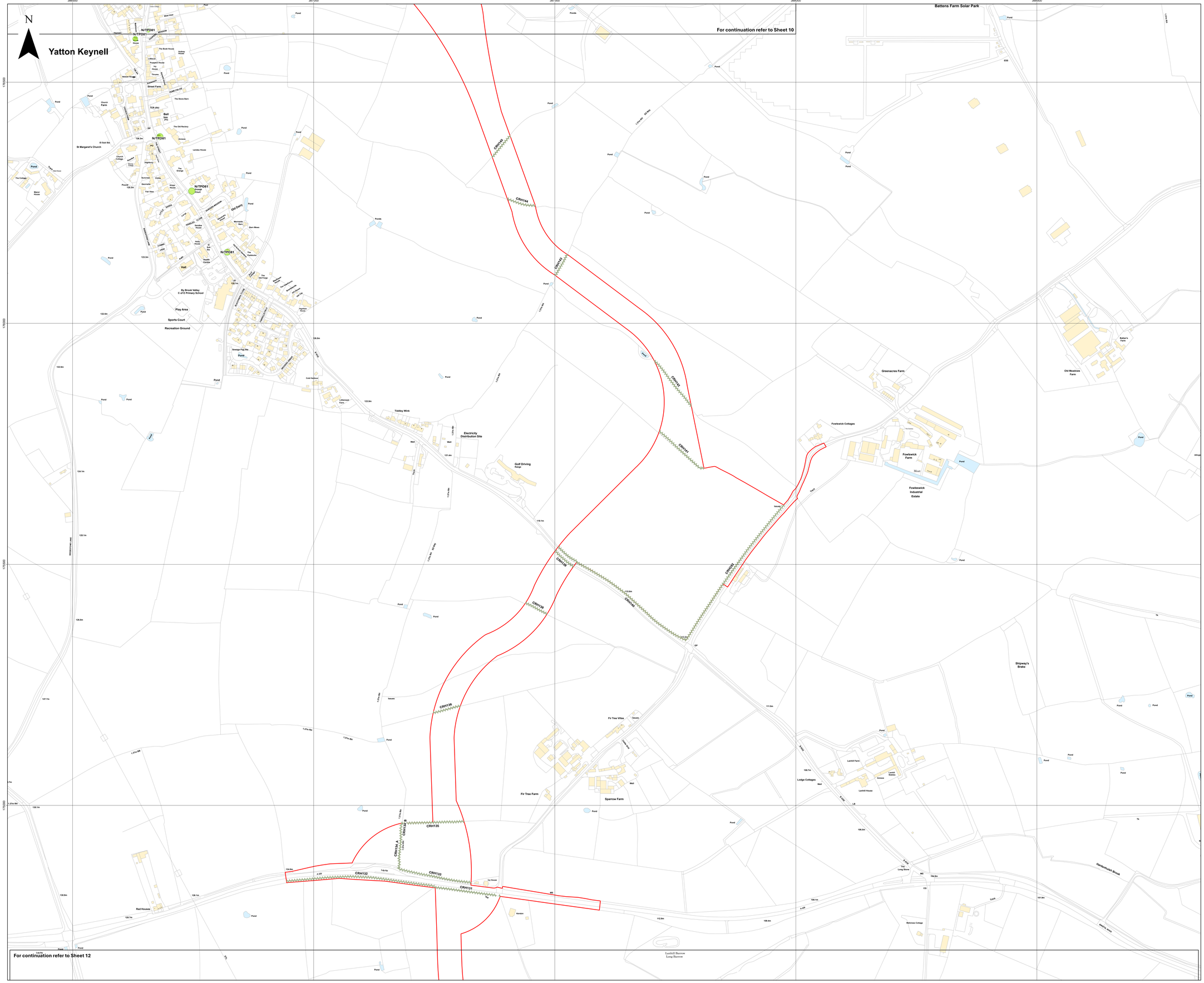
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Ref: P4443_LPR_ZZ_XX_DR_Z_EXA_0369	Date: 08/06/2026
Drawn by: BH	Checked by: JB

Hedgerow Height Plan

Sheet 9 of 23
Revision A

Lime Down Solar Park


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For continuation refer to Sheet 11
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CRH149
CRH148
CRH147
CRH146
CRH305
Rat Hill
Rathill Cottages
Rathill Plantation
Pond
Stevington Barn
West Sevington Farm
The Granary
West Sevington Farm Cottages
Broomfield
Broomfield House
Broomfield Cottages
Park Farm Cottage
Ross Cottage
Greensacre Farm
Park Farm
Broomfield Farm House
Cromhall Farm
Oakfield Farm
Springfield Farm
Broom's Farm
Reservoir
Reservoir (covered)
Water Tower
Summer Lane Cottage
Combe Leys
Cattle Grid
Kent's Bottom
Kent's Bottom Farm
Workings (dis)
Ponds
Weavers Cottage
Folly Barn
Folly Farm
The Folly
The Old Shop
Folly View
Folly Fields
Bracken Heights
Recreation Ground
Play Area
CLARKES LEAZE
WILSON CLOSE
Rectory Meadow
The Rectory
Old Rectory
Greenacre
Hedgerows
GROVE LANE
Grove Cottages
The Well House
Tresavorne
Middle Ash
Hollyberry Pear
Wood View
Elmsleigh Cottage
Old Schoolhouse
Grove Farm
Lower Grove
OAKHILL LANE
Southernhay
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Island GREEN POWER

Lanpro

Key

- Order Limits
- Sheet Index
- Hedgerows to be managed at 4.5m height
- Tree Preservation Order (TPO)

Layers: Lanpro, 2026; IGP, 2026
Base map: Reproduced from Ordnance Survey digital map data © Crown copyright 2026. All rights reserved. License number 0100031673

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Scale: 1:2,500@ A0

APFP Regulation: 5(2)(o)	Application Doc No. EN010168/EXAM/2.7
Ref: P4443_LPR_ZZ_XX_DR_Z_EXA_0369	Date: 08/06/2026
Drawn by: BH	Checked by: JB

Hedgerow Height Plan

Sheet 11 of 23

Revision A

Lime Down Solar Park

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175500 175000 174500

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For continuation refer to Sheet 11

For continuation refer to Sheet 13

CRH130 CRH129 CRH133 CRH127 CRH125 CRH126 CRH122 CRH121 CRH120 CRH119 CRH118 CRH117 CRH250 CRH251

Lanhill Barrow
Long Barrow

Lan Hill
Lanhill Clump
Smith's Plantation
Lanhill Brake
Fagot Heath
Corsham Wood
Fox Covert
The Privet
Sheldon Wood
Sheldon Manor
Sheldon Farm
Chapscroft Wood
Bushy Barrow
Allotment Gardens
Play Area
Pool Farm
Stables
Bridestowne Manor
Starveall Farm
The Fennels
Sewage Pumping Station
Holy Well
leaves

CHIPPENHAM LANE

Key

- Order Limits
- Sheet Index
- Hedgerows to be managed at 4.5m height

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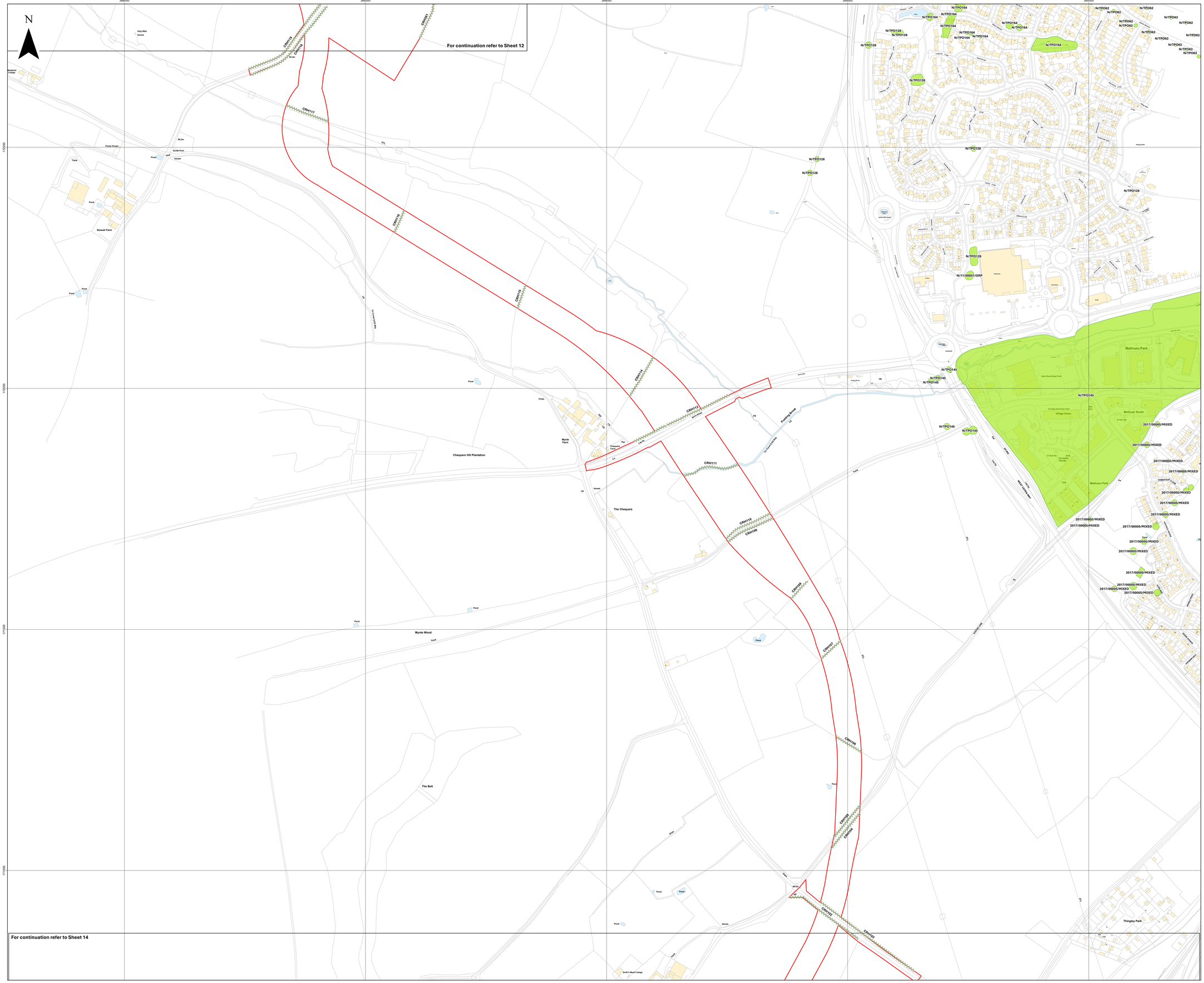
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Ref: P4443_LPR_ZZ_XX_DR_Z_EXA_0369	Date: 08/06/2026
Drawn by: BH	Checked by: JB

Hedgerow Height Plan

Sheet 12 of 23
Revision A

Lime Down Solar Park



Island Green Power

Lanpro

Key

- Order Limits
- Sheet Index
- Hedgerows to be managed at 4.5m height
- Tree Preservation Order (TPO)

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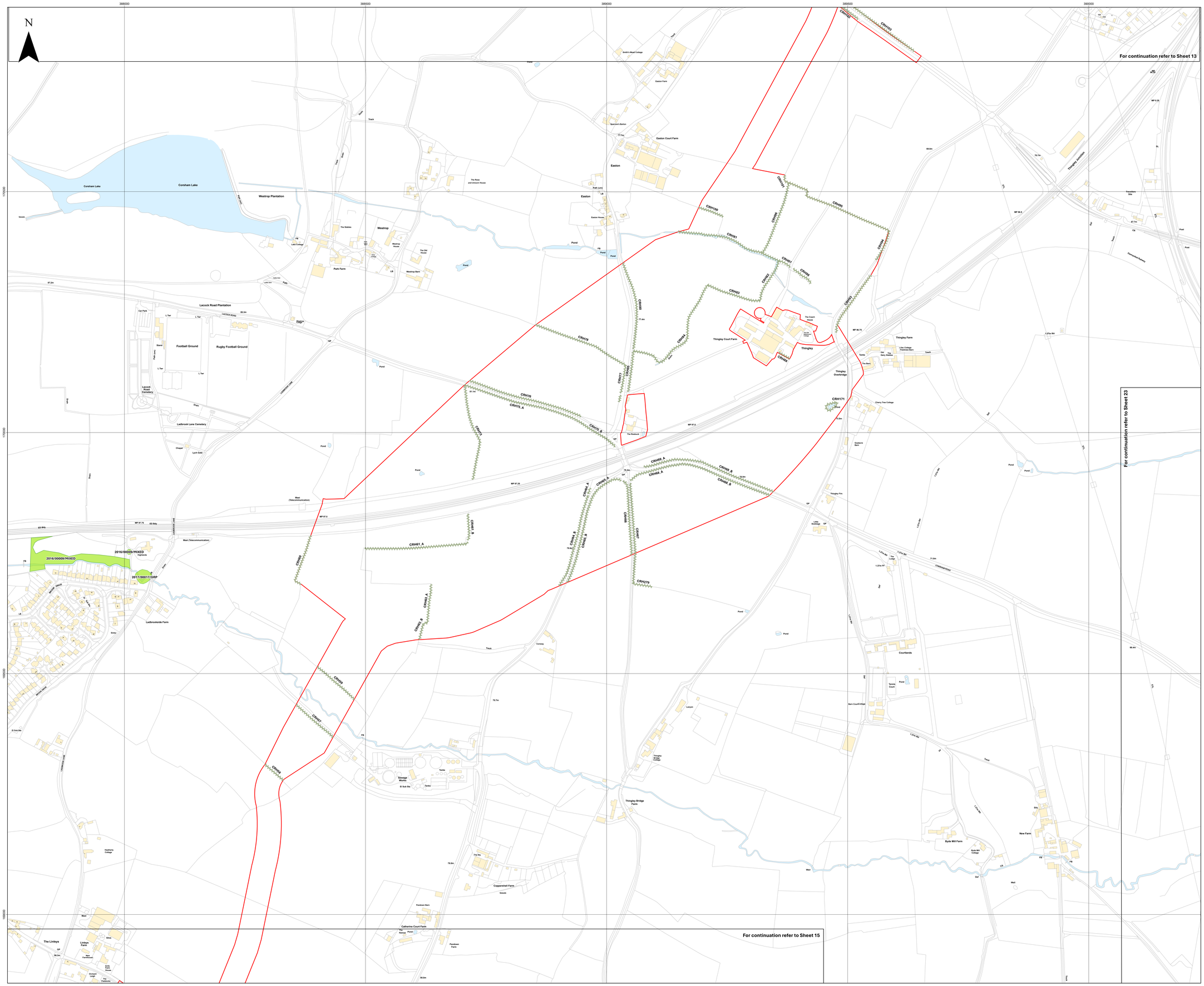
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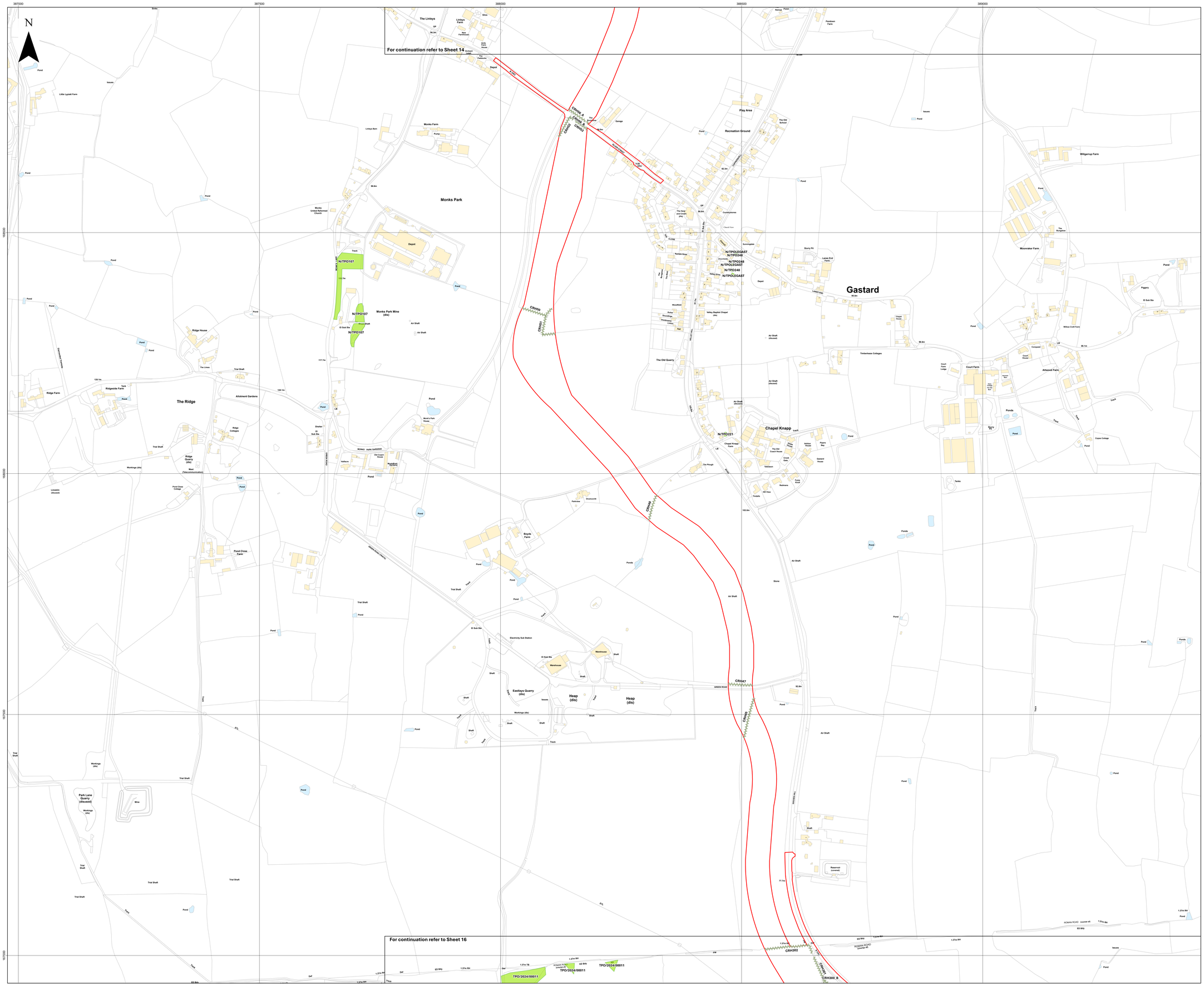
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Drawn by: BH	Checked by: JB

Hedgerow Height Plan

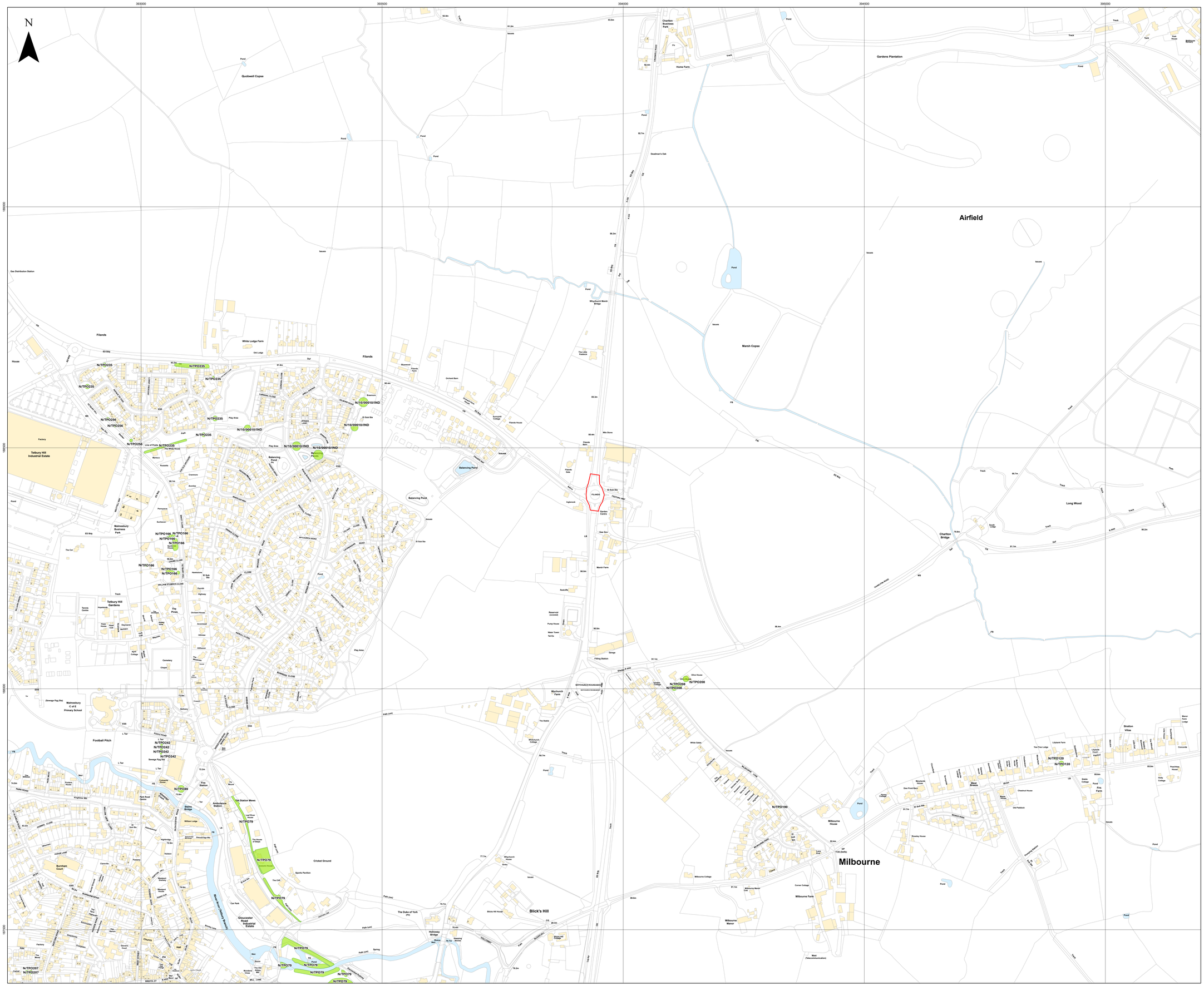
Sheet 13 of 23
Revision A

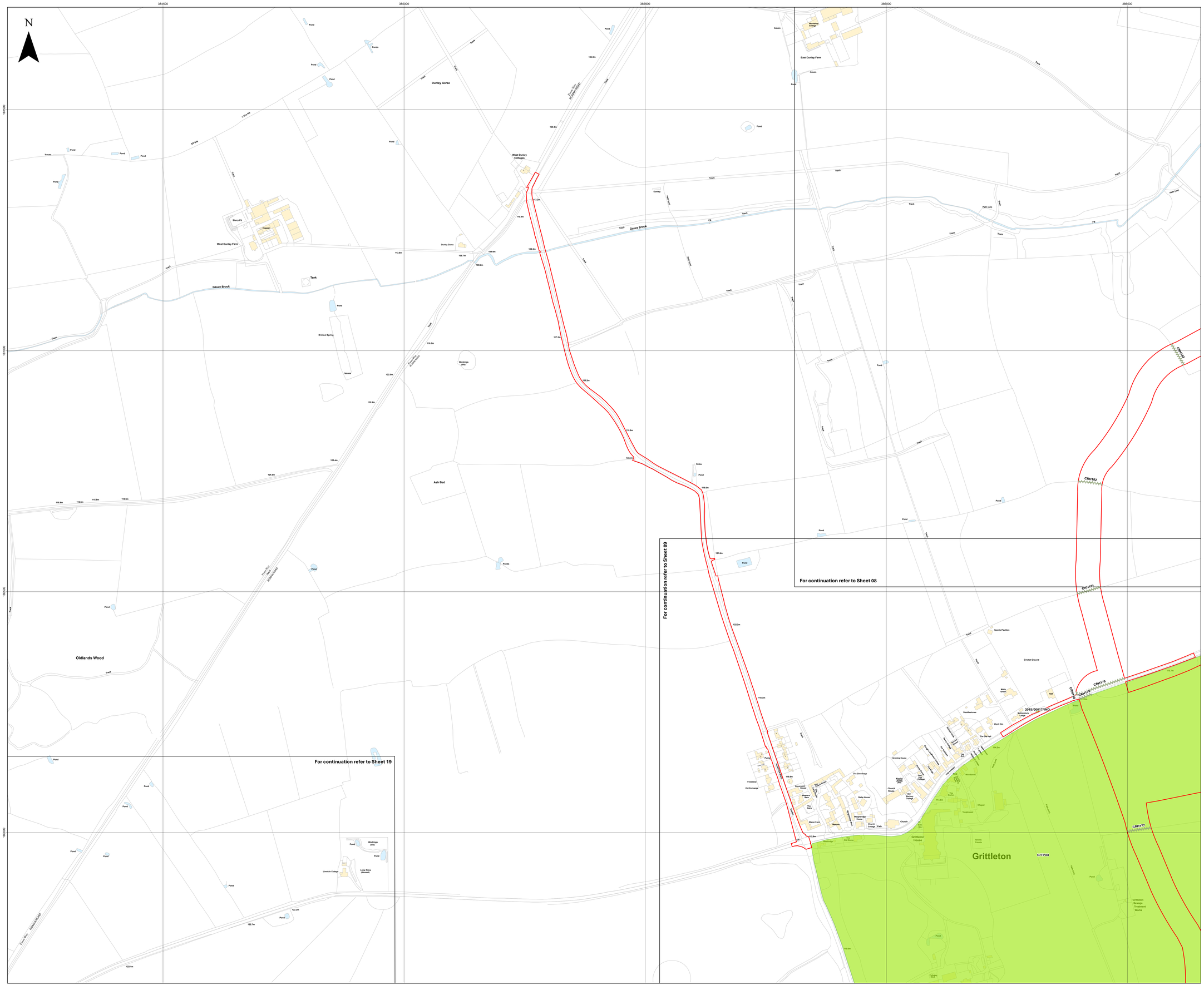
Lime Down Solar Park


N
388000
388500
389000
389500
390000
170000
169500
169000
For continuation refer to Sheet 13
For continuation refer to Sheet 23
For continuation refer to Sheet 15
Corsham Lake
Westrop Plantation
Westrop
Park Farm
Lacock Road Plantation
Football Ground
Rugby Football Ground
Lacock Road Cemetery
Ladbrook Lane Cemetery
Ladbrookside Farm
Easton
Easton Court Farm
Spencer's Barton
Smith's Wood Cottage
Easton Farm
The Rose and Unicorn House
Thingley Court Farm
Thingley
Thingley Farm
Thingley Overbridge
Thingley Junction
Courtlands
Byde Mill Farm
Thingley Bridge Farm
Coppershell Farm
Catherine Court Farm
The Linleys
Linleys Farm
2016/00009/MIXED
2017/00017/GRP
CRH1
CRH2
CRH3
CRH4
CRH5
CRH6
CRH7
CRH8
CRH9
CRH10
CRH11
CRH12
CRH13
CRH14
CRH15
CRH16
CRH17
CRH18
CRH19
CRH20
CRH21
CRH22
CRH23
CRH24
CRH25
CRH26
CRH27
CRH28
CRH29
CRH30
CRH31
CRH32
CRH33
CRH34
CRH35
CRH36
CRH37
CRH38
CRH39
CRH40


387000
387500
388000
388500
389000
165000
157500
150000
N
For continuation refer to Sheet 14
For continuation refer to Sheet 16
Monks Park
Monks Park Mine (dis)
Gastard
The Ridge
Chapel Knapp
Eastleys Quarry (dis)
Heap (dis)
Park Lane Quarry (disused)
Ridge Quarry (dis)
Boyds Farm
Pond Close Farm
Monks United Reformed Church
Valley Baptist Chapel (dis)
Atwood Farm
Court Farm
Moonraker Farm
Wilgemup Farm
Ridge Farm
Ridgeside Farm
Little Lyzzatt Farm
Linleigh Barn
Monks Farm
The Linleys
Linleys Farm
Pendown Farm
Play Area
Recreation Ground
Depot
Garage
Countryhomes
Summerlands
Lanes End Farm
Timberhaske Cottages
Court Farm Lodge
Willow Croft Farm
Piggery
Ponds
Tanks
Reservoir (covered)
Warehouse
Electricity Sub Station
Workings (dis)
Trial Shaft
Air Shaft
Shaft
Mine
Stone
Track
Pond
Ponds
CRH44
CRH45
CRH46
CRH47
CRH300_B
CRH301
CRH302
CRH303
CRH304
CRH305
CRH306
CRH307
N/TPO107
N/TPO221
N/TPO248
N/TPOLEGAST
TPO/2024/00011
Order Limits
Sheet Index
Hedgerows to be managed at 4.5m height
Tree Preservation Order (TPO)
Key
Island GREEN POWER
Lanpro
Layers: Lanpro, 2026; IGP, 2026
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0
100
200
300 Metres
Scale: 1:2,500@ A0
APFP Regulation: 5(2)(o)
Application Doc No. EN010168/EXAM/2.7
Ref: P4443_LPR_ZZ_XX_DR_Z_EXA_0369
Date: 08/06/2026
Drawn by: BH
Checked by: JB
Hedgerow Height Plan
Sheet 15 of 23
Revision A
Lime Down Solar Park




393000
393500
394000
394500
395000
N
Airfield
Milbourne
Blick's Hill
Quobwell Copse
Gardens Plantation
Long Wood
Marsh Copse
Charlton Business Park
Home Farm
Deadman's Oak
Whyddorch Marsh Bridge
Charlton Bridge
Tetbury Hill Industrial Estate
Malmesbury Business Park
Gloucester Road Industrial Estate
Tetbury Hill Gardens
Malmesbury C of E Primary School
Football Pitch
Burnham Court
Filands
White Lodge Farm
Milbourne House
Milbourne Manor
Milbourne Farm
Marsh Farm
Wychurch Farm
Wychurch Cottage
Wychurch Manor
Wychurch Roundabout
Stratton Villas
Manor Farm Lodge
Cricket Ground
Sports Pavilion
Car Park
Play Area
Fire Station
Ambulance Station
Gas Distribution Station
Sewage Pig Stn
Balancing Pond
Balancing Ponds
Holloway Bridge
Stone Bridge
Old Station Mews
The Duke of York (PH)
Filands Gate
Filands Barn
Filands House
Orchard Barn
Bluewood
Sunnyhill Cottage
The Little Paddock
Ingleswick
Garden Centre
Fitting Station
Reservoir (covered)
Pump House
Water Tower Tel Ex
Radcliffe
Old Mill
Mill Stone
Mill House
Corner Cottage
Milbourne Mill
Milbourne Mill Cott
Milbourne College
Dew Pond Barn
Rosely House
Wychurch House
Wychurch Cottage
Blicks Hill House
Blicks Hill Cottage
Mast (Telecommunication)
Old Paddock
Chestnut House
Wyck Hollow
Wheat Breeze
Lilybank Farm
Lilybank Guest Residence
Yew Tree Lodge
Stable Cottage
Fire Farm
Holly Cottage
Peachtree House
Concorde
Bramble Cottage
Bramble Cottage Annexe
Bramble Cottage Barn
Bramble Cottage Stable
Bramble Cottage Garage
Bramble Cottage Workshop
Bramble Cottage Shed
Bramble Cottage Greenhouse
Bramble Cottage Summerhouse
Bramble Cottage Pond
Bramble Cottage Paddock
Bramble Cottage Orchard
Bramble Cottage Lean-to
Bramble Cottage Porch
Bramble Cottage Chimney
Bramble Cottage Well
Bramble Cottage Gate
Bramble Cottage Fence
Bramble Cottage Hedge
Bramble Cottage Tree
Bramble Cottage Bush
Bramble Cottage Flower Bed
Bramble Cottage Vegetable Patch
Bramble Cottage Compost Bin
Bramble Cottage Rain Barrel
Bramble Cottage Solar Panel
Bramble Cottage Satellite Dish
Bramble Cottage Chimney Pot
Bramble Cottage Roof Tile
Bramble Cottage Ridge Tile
Bramble Cottage Gutter
Bramble Cottage Downpipe
Bramble Cottage Soffit
Bramble Cottage Fascia
Bramble Cottage Barge Board
Bramble Cottage Finial
Bramble Cottage Weather Vane
Bramble Cottage Lightning Conductor
Bramble Cottage Aerial
Bramble Cottage Flue
Bramble Cottage Vent
Bramble Cottage Skylight
Bramble Cottage Dormer
Bramble Cottage Porch Roof
Bramble Cottage Porch Pillar
Bramble Cottage Porch Step
Bramble Cottage Porch Door
Bramble Cottage Porch Window
Bramble Cottage Porch Light
Bramble Cottage Porch Bell
Bramble Cottage Porch Knocker
Bramble Cottage Porch Letterbox
Bramble Cottage Porch Mat
Bramble Cottage Porch Boot Scraper
Bramble Cottage Porch Umbrella Stand
Bramble Cottage Porch Coat Hook
Bramble Cottage Porch Shoe Rack
Bramble Cottage Porch Mirror
Bramble Cottage Porch Clock
Bramble Cottage Porch Picture
Bramble Cottage Porch Plant
Bramble Cottage Porch Vase
Bramble Cottage Porch Candle
Bramble Cottage Porch Lamp
Bramble Cottage Porch Rug
Bramble Cottage Porch Curtain
Bramble Cottage Porch Blind
Bramble Cottage Porch Shutter
Bramble Cottage Porch Window Box
Bramble Cottage Porch Flower Pot
Bramble Cottage Porch Hanging Basket
Bramble Cottage Porch Trellis
Bramble Cottage Porch Arch
Bramble Cottage Porch Gate
Bramble Cottage Porch Fence
Bramble Cottage Porch Hedge
Bramble Cottage Porch Tree
Bramble Cottage Porch Bush
Bramble Cottage Porch Flower Bed
Bramble Cottage Porch Vegetable Patch
Bramble Cottage Porch Compost Bin
Bramble Cottage Porch Rain Barrel
Bramble Cottage Porch Solar Panel
Bramble Cottage Porch Satellite Dish
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Bramble Cottage Porch Downpipe
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Bramble Cottage Porch Fascia
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Bramble Cottage Porch Weather Vane
Bramble Cottage Porch Lightning Conductor
Bramble Cottage Porch Aerial
Bramble Cottage Porch Flue
Bramble Cottage Porch Vent
Bramble Cottage Porch Skylight
Bramble Cottage Porch Dormer
Bramble Cottage Porch Porch Roof
Bramble Cottage Porch Porch Pillar
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Bramble Cottage Porch Porch Letterbox
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Bramble Cottage Porch Porch Umbrella Stand
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Bramble Cottage Porch Porch Shoe Rack
Bramble Cottage Porch Porch Mirror
Bramble Cottage Porch Porch Clock
Bramble Cottage Porch Porch Picture
Bramble Cottage Porch Porch Plant
Bramble Cottage Porch Porch Vase
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Bramble Cottage Porch Porch Hanging Basket
Bramble Cottage Porch Porch Trellis
Bramble Cottage Porch Porch Arch
Bramble Cottage Porch Porch Gate
Bramble Cottage Porch Porch Fence
Bramble Cottage Porch Porch Hedge
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Bramble Cottage Porch Porch Bush
Bramble Cottage Porch Porch Flower Bed
Bramble Cottage Porch Porch Vegetable Patch
Bramble Cottage Porch Porch Compost Bin
Bramble Cottage Porch Porch Rain Barrel
Bramble Cottage Porch Porch Solar Panel
Bramble Cottage Porch Porch Satellite Dish
Bramble Cottage Porch Porch Chimney Pot
Bramble Cottage Porch Porch Roof Tile
Bramble Cottage Porch Porch Ridge Tile
Bramble Cottage Porch Porch Gutter
Bramble Cottage Porch Porch Downpipe
Bramble Cottage Porch Porch Soffit
Bramble Cottage Porch Porch Fascia
Bramble Cottage Porch Porch Barge Board
Bramble Cottage Porch Porch Finial
Bramble Cottage Porch Porch Weather Vane
Bramble Cottage Porch Porch Lightning Conductor
Bramble Cottage Porch Porch Aerial
Bramble Cottage Porch Porch Flue
Bramble Cottage Porch Porch Vent
Bramble Cottage Porch Porch Skylight
Bramble Cottage Porch Porch Dormer
N/TPO235
N/TPO256
N/TPO166
N/TPO242
N/TPO207
N/TPO208
N/TPO79
N/TPO120
N/TPO190
N/TPO59
N/10/00010/IND
N/10/00018/IND
Line of Pollards
The White House
Old Station Mews
Bryst Avon (Tributary Bybrook)
Bybrook
Malmesbury
Tetbury
Cricklade
Minety
Oaksey
Crudwell
Sherston
Easton Grey
Leigh
Charlton
Hankerton
Ashton Keynes
Somerford Keynes
Cirencester
Swindon
Chippenham
Calne
Devizes
Marlborough
Wootton Bassett
Royal Wootton Bassett
Purton
Lyneham



Key

- Order Limits
- Sheet Index
- Hedgerows to be managed at 4.5m height
- Tree Preservation Order (TPO)

Layers: Lanpro, 2026; IGP, 2026

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0 100 200 300 Metres

Scale: 1:2,500@ A0

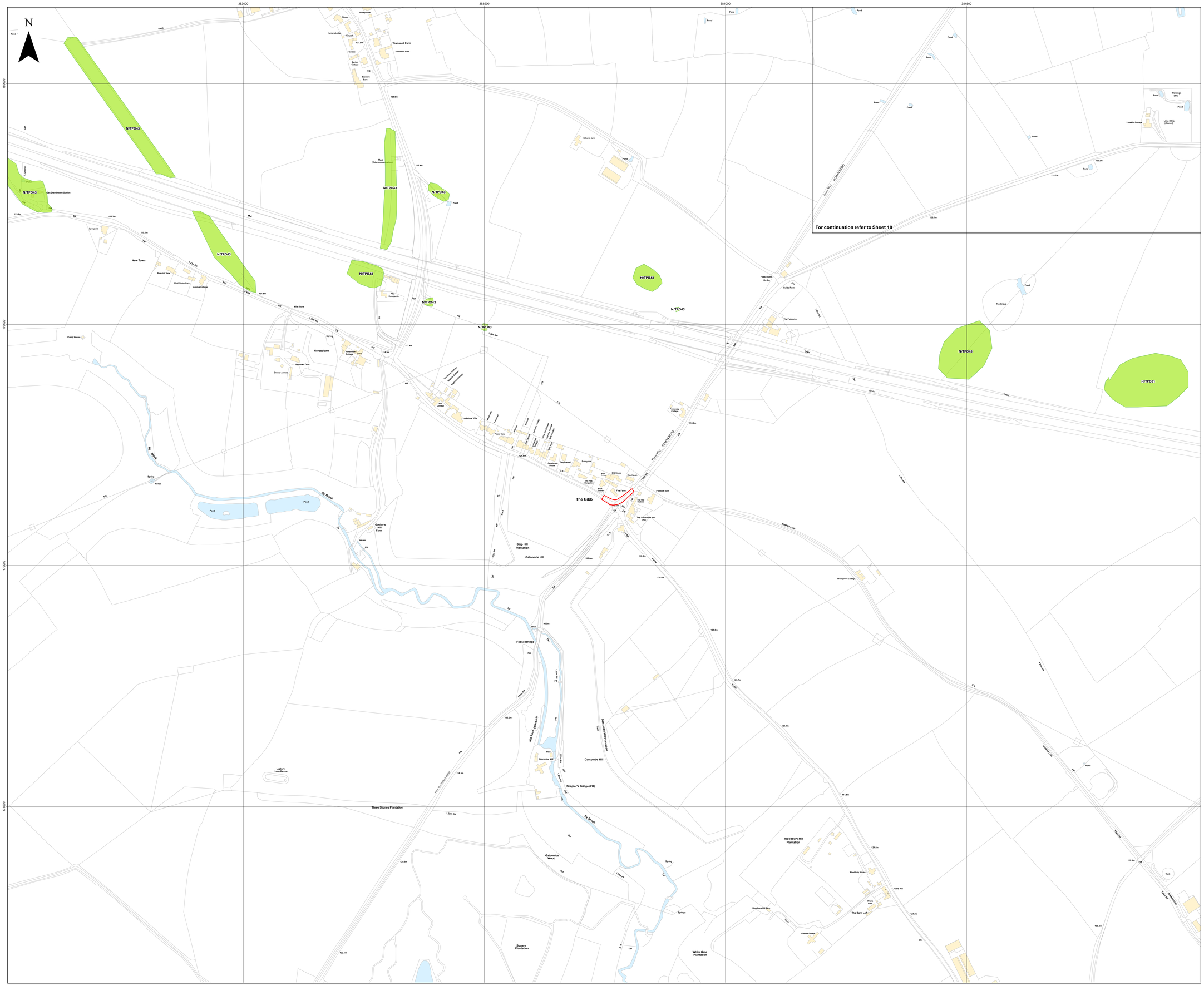
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Ref: P4443_LPR_ZZ_XX_DR_Z_EXA_0369	Date: 08/06/2026
Drawn by: BH	Checked by: JB

Hedgerow Height Plan

Sheet 18 of 23

Revision A

Lime Down Solar Park



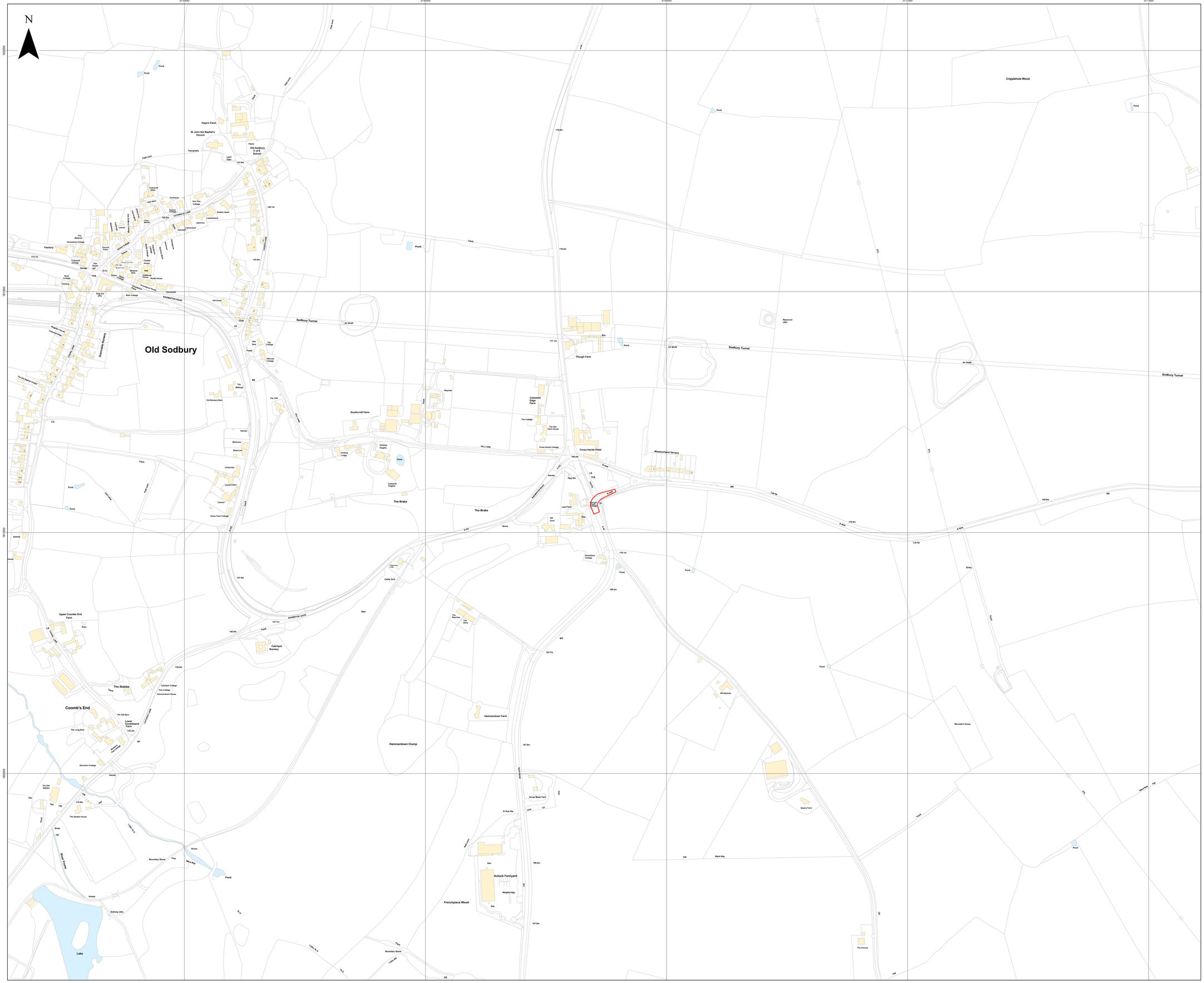
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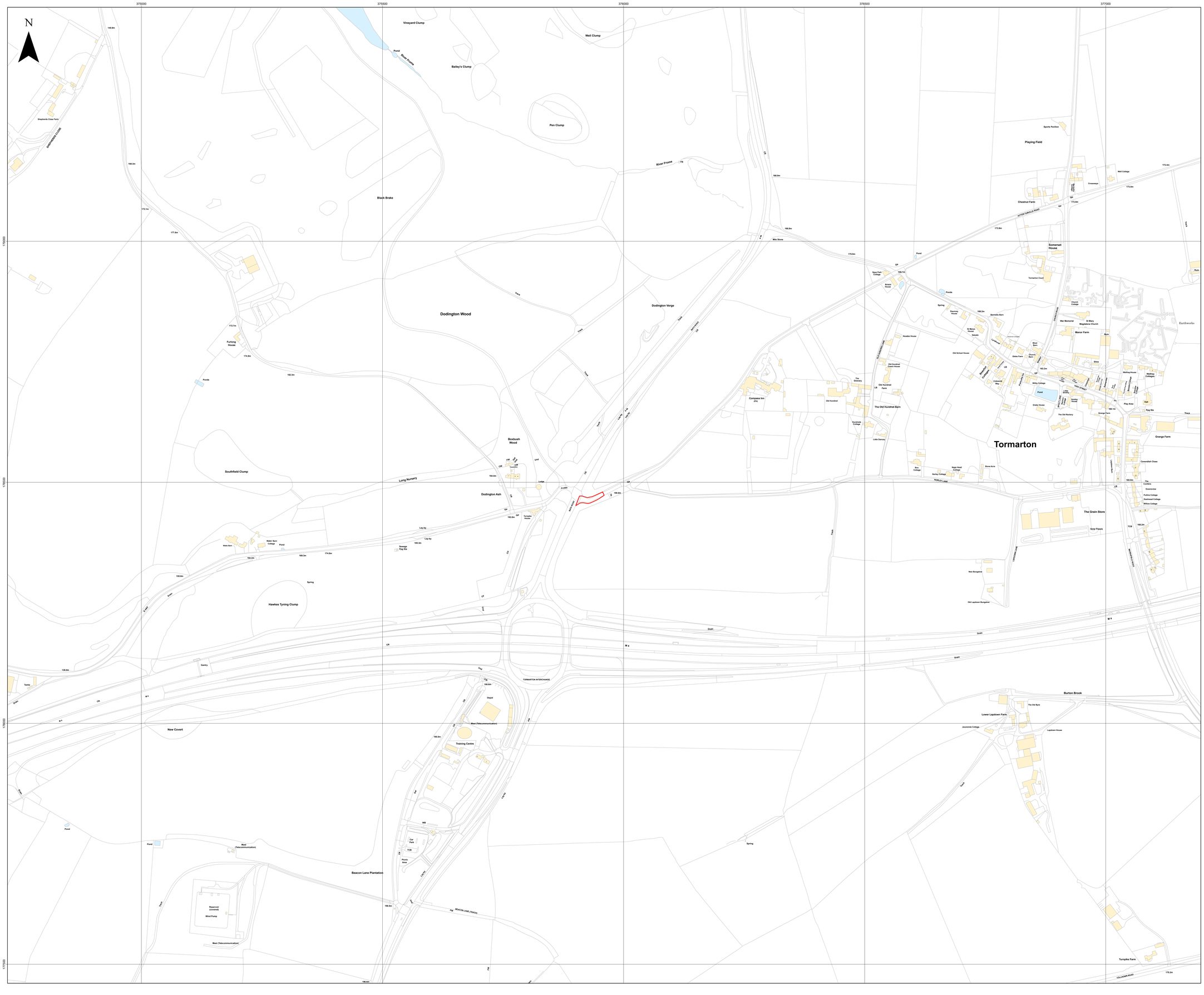
Hedgerow Height Plan

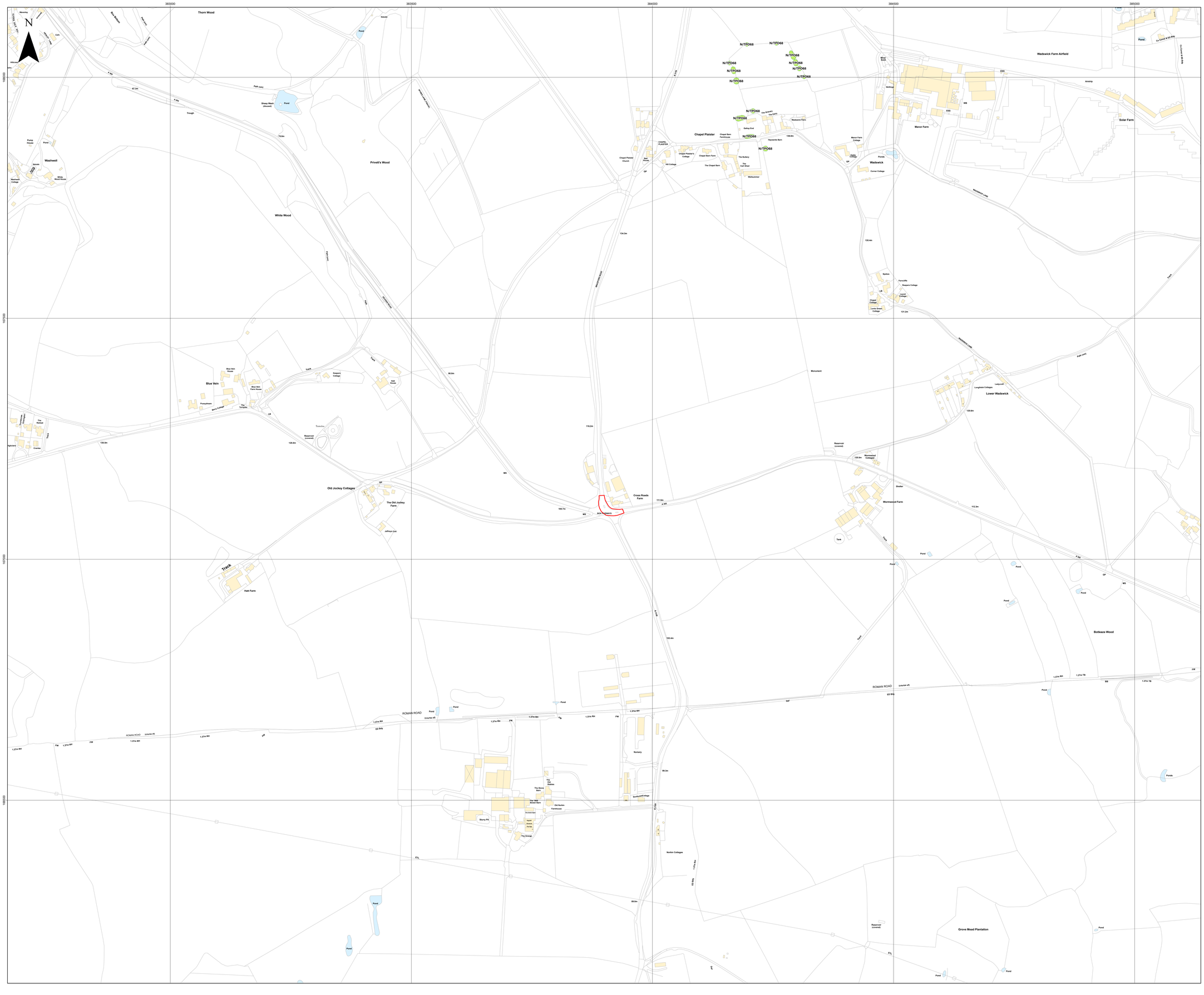
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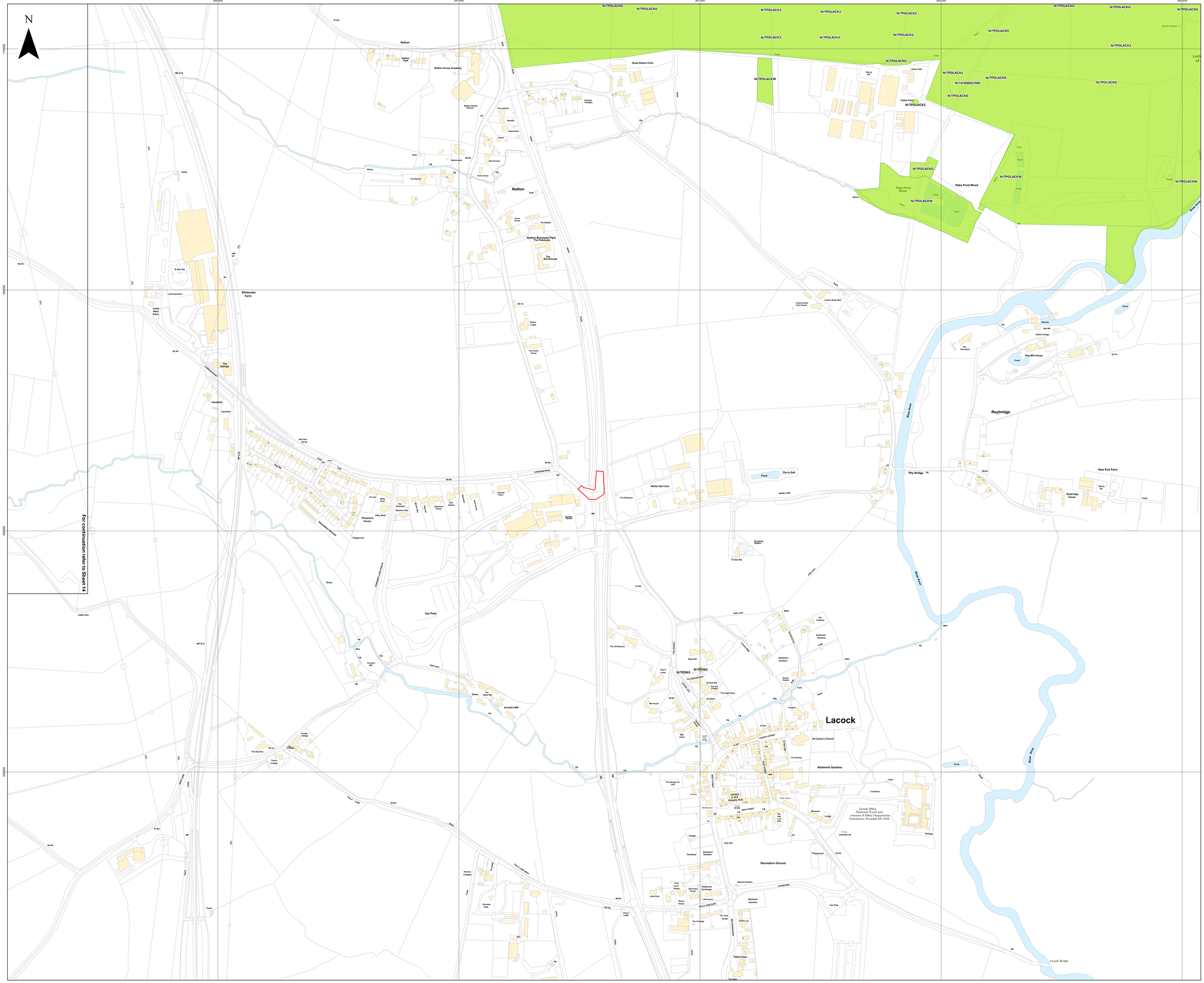
Revision A

Lime Down Solar Park

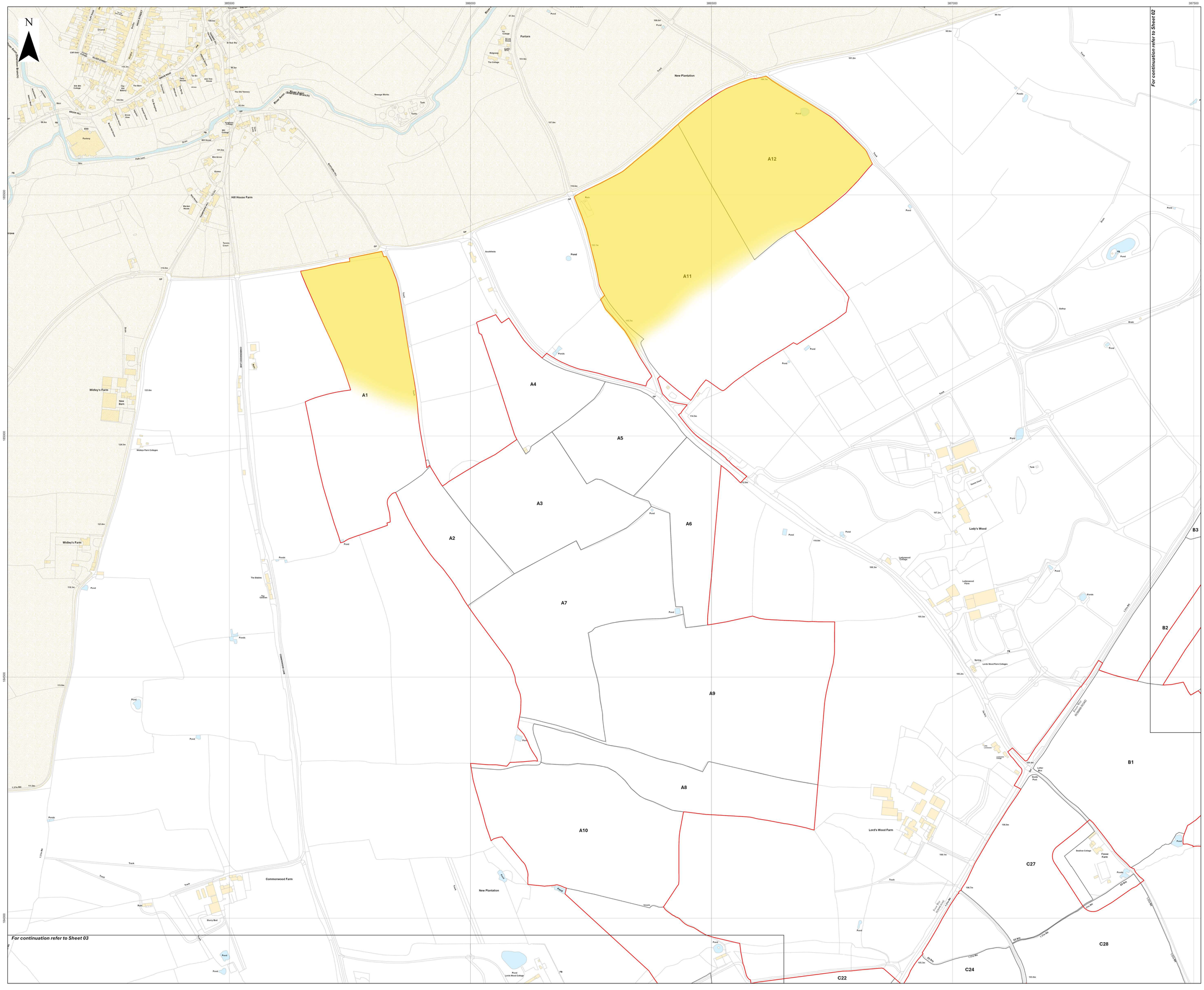

375500
376000
376500
377000
377500
183000
182500
182000
N
Old Sodbury
Old Sodbury Church of England School
St John the Baptist's Church
Hoye's Farm
Hoye
Topmast
Lych Gate
191.6m
Path (OFF)
Pond
Path (OFF)
Colswold View
Portbella
New Year Cottage
Bodkin Hotel
Landsdowne
Japonica
Farmyard
Ammonaute
Path (OFF)
Factory
The Bothams
Horseshoe Cottage
Church Farm
Colswold Cottage
Garage
The Green GP
Chalet House
Rose Cottage
Hall
Colswold House
Acute House
Back Cottage
Factory
Dog Bin (PH)
Bain Cottage
Sunnyside
RADMILTON ROAD
Old Chalk
Sodbury Tunnel
Air Shaft
Chalk
LB
Stile
Posts
The Cottage
Hillcrest Cottage
The Mallings
Old Brewery Barn
The Cliff
MS
Southcroft Farm
Track
Weybole
Cotswold Edge Farm
The Cottage
The Old Farm House
Cross Hands Cottage
Cross Hands Hotel
Westmorland Terrace
Hill Lane
Gubbing Heights
Hunting Lodge
Pond
Colswold Heights
The Brake
Tanpits
Sinks
Pay Site
Lee Farm
Silo
Hill Farm
Knowlsford Cottage
Cripplehole Wood
Reservoir (dry)
Plough Farm
Silo
Pond
Track
179.8m
177.1m
178.1m
183.7m
188.2m
Lay-by
MS
Sinks
Pond
Barrnell's Gorse
Windylands
Quarry Farm
Ward Bdy
The Clowns
Scrap Metal Yard
Shed
Ind
CF
El Sub Sta
Ackack Farmyard
Weighbridge
Silo
Frenchpiece Wood
Park Wall
196.0m
187.6m
Upper Coombs End Farm
Ruin
LB
Coombs Lane
Catchpot Nursery
Catchpot Cottage
Hub Cottage
Hammerdown House
The Stables
Coomb's End
The Old Byre
Lower Coombsend Farm
The Long Barn
Dormtown Cottage
The Old Stables
The Garden House
Boundary Stone
Stone Fencing
Lake
Subway (dis)
Sluice
Weird Bdy
Pond
Track
Cattle Grid
Wall
147.1m
140.9m
151.6m
138.6m
123.2m
115.2m
Hammerdown Hill
Hammerdown Clump
Hammerdown Farm
Ashcombe Lodge
The Sticks
The Elms
Ashcombe Road
Ashcombe Bottom
Track
Boundary Stone
Old
Ward Bdy
Track
Sinks
Pond
Pond
Pond

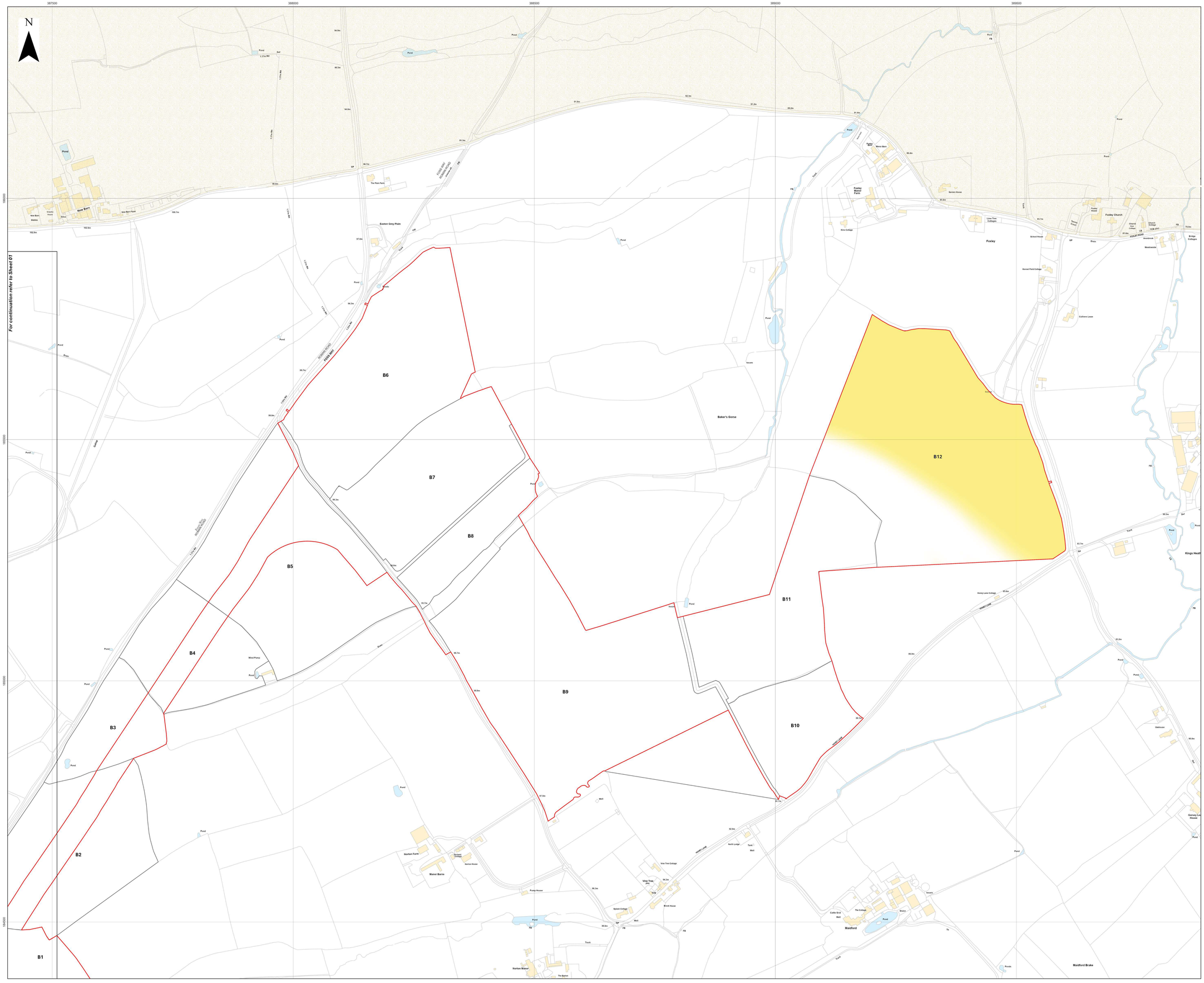

375000
375500
376000
376500
377000
N
175000
176000
177000
Vineyard Clump
Well Clump
Pond
River Frome
Bailey's Clump
Pen Clump
Shepherds Close Farm
Shepherds Close
Black Brake
Dodington Wood
Dodington Verge
Furlong House
Ponds
Southfield Clump
Boxbush Wood
Long Nursery
Dodington Ash
Wells Barn
Wells Barn Cottage
Lay-by
Sewage Pig Bin
Hawkes Tyning Clump
Spring
Gantry
Tanks
New Covert
Pond
Mast (Telecommunication)
Beacon Lane Plantation
Reservoir (covered)
Wind Pump
Mast (Telecommunication)
Beacon Lane (Track)
Mile Stone
River Frome
Dodington Ash
Turnpike House
Lodge
Depot
Mast (Telecommunication)
Training Centre
TORMARTON INTERCHANGE
M 4
Drain
Spring
Sports Pavilion
Playing Field
Chestnut Farm
Acton Turville Road
Somerset House
Tormarton Court
Spye Park College
Bristol House
Ponds
Spring
Dawning House
Beeholds Barn
St Mary Magdalene Church
War Memorial
Church Cottage
Manor Farm
Earthworks
Rectory Lane
Noades House
Old School House
Old Hundred Coach House
Old Hundred Farm
Old Hundred
Compass Inn (PH)
Tor Granary
The Old Hundred Barn
Hundreds Cottage
Little Dansey
Tormarton
Bowood Cottages
Orchard Way
Glebe Farm
Church Barn
West Barn
Stiles
Methuen Cottages
Methuen House
Methuen Cottage
Methuen Barn
Methuen Farm
Methuen Farm Cottage
Methuen Farm Barn
Wilts & Berks Canal
Wilts & Berks Canal Feeder
Wilts & Berks Canal Feeder Cottage
Wilts & Berks Canal Feeder Barn
Wilts & Berks Canal Feeder Farm
Wilts & Berks Canal Feeder Farm Barn
Wilts & Berks Canal Feeder Farm Cottage
Wilts & Berks Canal Feeder Farm House

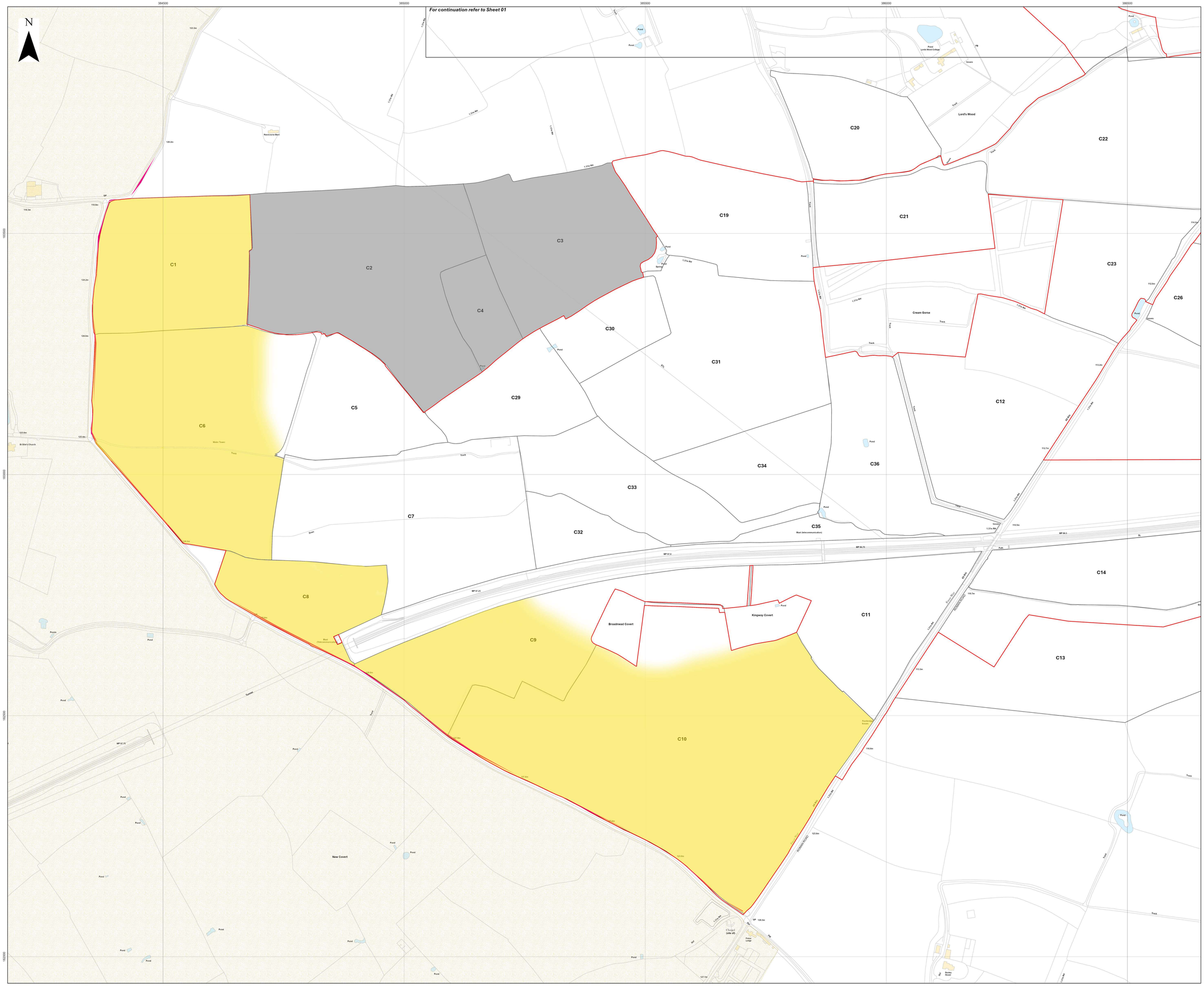

383000
383500
384000
384500
385000
167000
166500
166000
N
Thorn Wood
Privett's Wood
White Wood
Washwell
Blue Vein
Old Jockey Cottages
Hatt Farm
Track
Chapel Plaister
Wadwick Farm Airfield
Manor Farm
Solar Farm
Wadwick
Lower Wadwick
Botleaze Wood
Cross Roads Farm
Wormwood Farm
Grove Mead Plantation
Norton Cottages
Nursery
ROMAN ROAD
Wadwick Lane
A 4
A 342
A 345
M4
M5
N/TPO68
Pond
Trough
Shelter
Tank
Monument
Reservoir (covered)
Pumping House
Keepers Cottage
Hill House
Blue Vein Farm House
Purleyhaven
The Turnpike
Reservoir (covered)
Old Jockey Cottages
The Old Jockey Farm
Jeffreys Coit
Hatt Farm
Chapel Plaister Church
Red Tumps
Chapel Barn Farmhouse
Chapel Barn Farm
The Chapel Barn
Chapel Plaister's Cottage
Haywards Barn
Gallop End
The Bullery
The Cart Shed
Wellsummer
Manor Farm Cottage
Gable Cottage
Ponds
Corner Cottage
Spinks
Farncliffe
Reapers Cottage
Laurel Cottage
Chapel Cottage
Lords Green Cottage
Longhaven Cottages
Ladycroft
Wormwood Cottages
The Old Stables
The Stone Barn
The 1906 Dower Barn
Old Norton Farmhouse
Southcott Cottage
Slurry Pit
Hayes Wood
The Granary
Footpath
Bridleway
Track
Ditch
Hedge
Fence
Wall
Path (dis)
Path (obs)
Quarry
Orchard
Coppice
Scrub
Ancient Woodland
Veteran Tree
Ancient Tree
Ancient Hedgerow
Ancient Replanted Hedgerow
Ancient Reduced Hedgerow
Ancient Replanted Reduced Hedgerow
Important Hedgerow
Historic Hedgerow
Historic Replanted Hedgerow
Historic Reduced Hedgerow
Historic Replanted Reduced Hedgerow
Non-Ancient Non-Historic Hedgerow
Non-Ancient Non-Historic Replanted Hedgerow
Non-Ancient Non-Historic Reduced Hedgerow
Non-Ancient Non-Historic Replanted Reduced Hedgerow
Ditch
Bank
Ditch and Bank
Bank and Ditch
Fence
Wall
Hedge
Tree Group
Tree (self)
Tree (planted)
Woodland
Scrub
Orchard
Coppice
Quarry
Pond
Tank
Shelter
Monument
Reservoir (covered)
Pylon
Electricity Substation
Electricity Transformer
Electricity Pylon
Electricity Line
Gas Governor
Gas Valve
Gas Pipeline
Gas Pipeline (Buried)
Gas Pipeline (Above Ground)
Gas Pipeline (Below Ground)
Gas Pipeline (Above Ground and Below Ground)
Gas Pipeline (Above Ground and Below Ground and Buried)
Gas Pipeline (Above Ground and Below Ground and Buried and Above Ground)
Gas Pipeline (Above Ground and Below Ground and Buried and Above Ground and Below Ground)
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N
390500
391000
391500
392000
392500
170000
169500
169000
N/TPOLACKG
N/TPOLACK3
N/TPOLACK2
N/TPOLACKW
N/10/00003/IND
N/TPO63
Notton
Great Notton Farm
Notton Park
Notton House Academy
Notton House School
Orchard Cottages
Perry Brook
Ryeyds
Netherfield
Acres
Old Orchard
Home Close
The Retreat
Tank
Sluice
Notton Business Park
The Paddocks
The Stonehouse
The Stables
Canal House
Notton Lodge
The Coach House
Whitsoaks Farm
Larks Nest Farm
Larks Nest Barn
El Sub Sta
The Sidings
Hamsland
Horsefield
Common Road
Rosemary House
Willy Wood
Playground
Recreation Ground
Car Park
Rake Pond Wood
Rake Pond
Bunny Pit
Home Park
Horton Farm
Reybridge
Rey Bridge
Ray Mill House
Ray Mill
Stable Cottage
The Riverbank
Sports Pavilion
New End Farm
Reybridge House
Slurry Pit
Track
Lacock
St Cyriac's Church
Lacock C of E Primary Sch
Lacock Abbey (National Trust) and remains of Abbey (Augustinian Canonesses, Founded AD 1232)
The George Inn (Pic)
The Red Lion (Pic)
Cuckoo Bush Farm House
Cuckoo Bush Barn
Allotment Gardens
Cemetery
Chapel
Museum
Lodge
Columns
Dovecot
Gas Gov
Playground
Sports Pavilion
Pumping Station
Mill Farm
Mill House
Sundown
The Old Rectory
The Old Chapel
The Angel Dairy
The Grocery
Reynolds
Gay's Lease
The Paddock
Pump House
Ford
Weir
Mast
Path (off)
Path Jnctn
Arnold's Mill
The Water Mill
Pound's Mill
Pondis Cottage
The Beeches
Thorne Cottage
Nursery Cottages
Caravan Park
Little Elms
Ranch House
Old Police House
Telephone Exchange
Glenmorne
The Vicarage
The Folly
Holmes Lea
Talbot View
The Oaks
White Hall Farm
The Paddocks
Slurry Bed
Pond
Gas Gov 62.3m
Gas Gov
Tank
Silo
Track
Lay By
Cattle Grid
Pond
Stream
River Avon
River Marden
Lacock Bridge
Bowden Hill
Folly Lane
Folly Lane West
Folly Lane East
Corsham Road
Mond Lane
Church Street
Colonels Street
High Street
Mill Lane
Ivy Lane
Bridge Street
Mother Rist
Sandy Lane
Hollow Lane
Common Lane
Chippenham Road
Pathway
Track
Drain
Ditch
Hedge
Fence
Fence (remains of)
Wall
Building
Pond
Tank
Pond
Pond
Pond

Annex E LV1.9 – Spatial Extent of the Setting of the Cotswold National Landscape


N
385500
386000
386500
387000
387500
185500
185000
184500
A1
A2
A3
A4
A5
A6
A7
A8
A9
A10
A11
A12
B1
B2
B3
C22
C24
C27
C28
Widley's Farm
HB House Farm
Commonwood Farm
Lord's Wood Farm
Lady's Wood
New Plantation
Forlorn
Bouthfields
Lodge Wood Farm Cottages
Widley Farm Cottages
Ladywood Farm
Ladywood Cottage
Seatree Cottage
Fosse Farm
Roman Road
Gallop
Drain
Track
Pond
Ponds
Tank
Spring
Stony Bed
The Stables
The Gallows
Sewage Works
Factory
Church
Brook Cottage
Ridgeway
The Cottage
Tye Cottage
Tye Old Tannery
Tye Old Bakery
Tye Barn
Tye Oast
Tye Oast House
Ash Tree House
Tye Oast Cottage
Tye Meadow
Tye Meadow Cottage
Tye Meadow Barn
Tye Meadow Oast
Tye Meadow Oast House
Tye Meadow Oast Cottage
Tye Meadow Oast Barn
Tye Meadow Oast Barn Cottage
Tye Meadow Oast Barn House


N
387500
388000
388500
389000
389500
190000
195000
194500
For continuation refer to Sheet 01
B1
B2
B3
B4
B5
B6
B7
B8
B9
B10
B11
B12
Baker's Gorse
Foxley
Foxley Church
Foxley Manor Farm
Kiln Cottage
Lime Tree Cottages
School House
Kennel Field Cottage
Cullimers Lease
Garden House
Manor Barns
Norton Farm
Norton Manor
Norton House
Orchard Cottage
Pump House
Vine Tree
Vine Tree Cottage
Brook House
Splash Cottage
North Lodge
Maidford
The Cottage
Maidford Brake
Kings Heath
Oakhouse
Westbrooke
Avondrook
Bridge Cottages
Honey Lane Cottage
The Plain Farm
Easton Grey Plain
New Barn
New Barn Pond
Wood Pumpr
ROSS ROAD
FOSS WAY
HONEY LANE
FOXLEY LANE
Island GREEN POWER
Lanpro
Key
Order Limits
Sheet Index
National Landscape
Applicant's consideration of extent of Site within the setting of the CNL
Layers: Lanpro, 2026; IGP, 2026
Base map: Reproduced from Ordnance Survey digital map data © Crown copyright 2026. All rights reserved. License number 0100031673
Contains OS data © Crown Copyright and database right 2026. Contains data from OS Zoomstack
0
100
200
300 Metres
Scale: 1:2,500@ A0
APFP Regulation: 5(2)(o)
Application Doc No. EN010168/EXAM/2.7
Ref: P4443_LPR_ZZ_XX_DR_Z_EXA_0370
Date: 09/06/2026
Drawn by: JB
Checked by: CJ
Extent of Cotswolds National Landscape Setting
Sheet 2 of 5
Revision A
Lime Down
Solar Park


For continuation refer to Sheet 01
N
384500
385000
385500
386000
386500
185000
184500
184000
C1
C2
C3
C4
C5
C6
C7
C8
C9
C10
C11
C12
C13
C14
C19
C20
C21
C22
C23
C26
C29
C30
C31
C32
C33
C34
C35
C36
Broadmead Covert
Kingway Covert
New Covert
Cream Gorse
Lord's Wood
Racecourse Barn
St Giles's Church
Water Tower
Mast (Telecommunications)
Pond
Spring
Track
Drain
Path
Footpath
Bridleway
Byway
Fence
Hedge
Trees
Scrub
Quarry
Building
Farm Shop
Cricket (site of)
Manor Farm Lodge
Burley Wood
Lords Wood Cottage
Roundhill Wood
Rushmoor Lane
Lime Ave
Ash Ave
Beech Ave
Elm Ave
MP 97.5
MP 97.25
MP 97.0
MP 96.75
MP 96.5
MP 96.25
GP
BT
FB
OHL
Island GREEN POWER
Lanpro
Key
Order Limits
Sheet Index
National Landscape
Applicant's consideration of extent of Site within the setting of the CNL
Field Parcels within the setting of the CNL removed from the Scheme prior to Application
Layers: Lanpro, 2026; IGP, 2026
Base map: Reproduced from Ordnance Survey digital map data © Crown copyright 2026. All rights reserved. License number 0100031673
Contains OS data © Crown Copyright and database right 2026. Contains data from OS Zoomstack
0
100
200
300 Metres
Scale: 1:2,500@ A0
APFP Regulation: 5(2)(o)
Application Doc No. EN010168/EXAM/2.7
Ref: P4443_LPR_ZZ_XX_DR_Z_EXA_0370
Date: 09/06/2026
Drawn by: JB
Checked by: CJ
Extent of Cotswolds National Landscape Setting
Sheet 3 of 5
Revision A
Lime Down
Solar Park

Annex F LV1.11 – Sections and Commentary from Consultation with CNLB and Wiltshire Council

Lime Down
Solar Park

Part A: Consultation Sections

VP 31
VP 30
VP 32
VP 33
VP 25
CNL G
CNL A
C1
C6
C5
C7
C8
C9
C10
C11
C12
C14
C19
C21
C22
C23
C29
C30
C31
C32
C33
C34
C35
C36
Lord's wood
Cream Gorse
South Wales Main Line
Broadmead Covert
Kingway Covert
New Covert
Fosse Way
Surrendell Wo

Location Plan
1:100,000 @ A0

Island GREEN POWER
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Key

- Area For Solar Panels And Associated Development

Existing

- Existing Vegetation
- Existing Ditch Verge
- Existing Footpath
- Existing Bridleway
- Existing Byway Open To All Traffic
- Existing Restricted Byways
- Existing Buildings
- Existing Listed Buildings
- Existing Utilities

Proposed

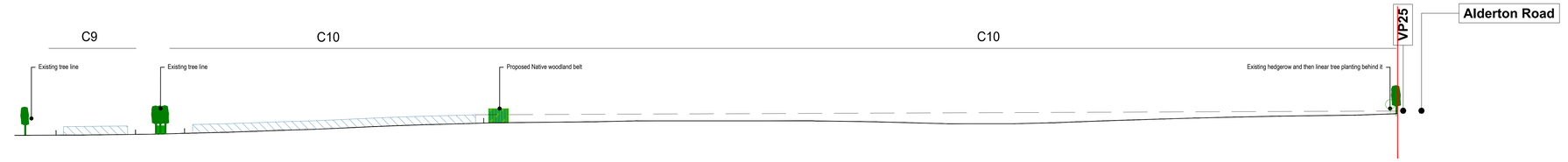
- Existing Vegetation To Be Retained And Enhanced
- Proposed Grassland Creation (Beneath Panels)
- Proposed Tussock Grassland Margins
- Proposed Damp Grassland
- Proposed Ground Nesting Bird Mitigation - Set Aside
- Proposed Ground Nesting Bird Mitigation - Continued Arable Land
- Proposed Diverse Wildflower Meadow
- Proposed Low Density Scrub
- Existing Hedge To Be Reinforced/Gapped Up With Native Tree Planting
- Proposed Native Hedgerow With Trees
- Proposed Linear Tree Planting
- Proposed Native Woodland Belt
- Proposed Native Woodland Block
- Proposed Riparian Corridor
- Proposed Solar Arrays
- Proposed Fenceline
- Proposed Access Tracks
- Proposed Inverters
- Proposed Substation
- Proposed Battery Energy Storage Systems
- Proposed Permissive Path For Pedestrians
- Proposed Permissive Path For Pedestrians, Equestrians and Cyclists
- Existing Vegetation To Be Removed
- Proposed Indicative Locations For Ponds
- Proposed Locations For Reintroduction Of Historic Ponds

1:2,500 @A0

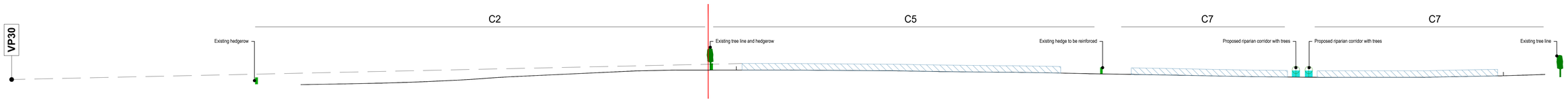
LIME DOWN SOLAR PROJECT

Figure NA.
Lime Down Solar Site C
Key Plan
Viability Sections - Sheet 1

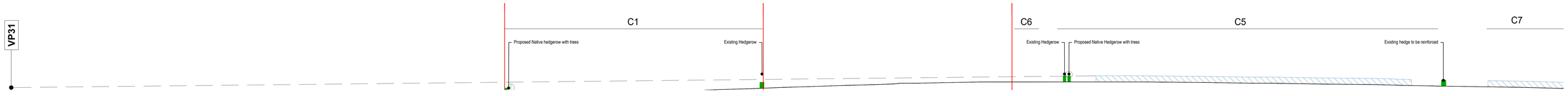
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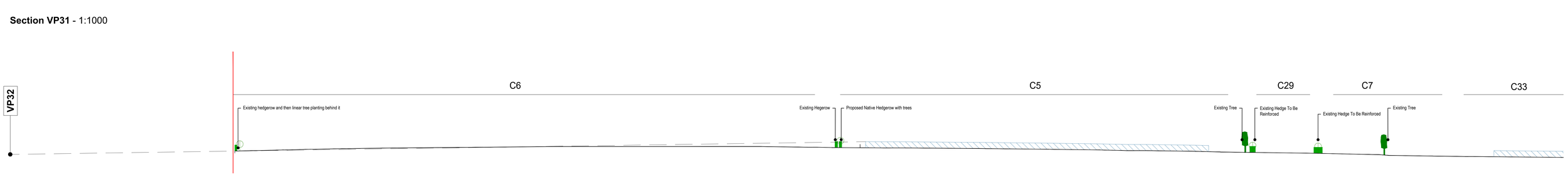
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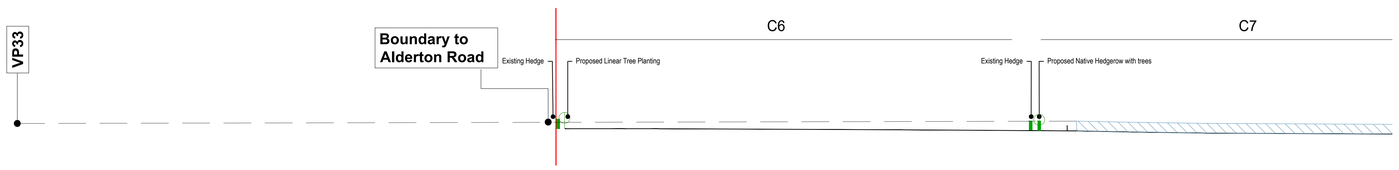
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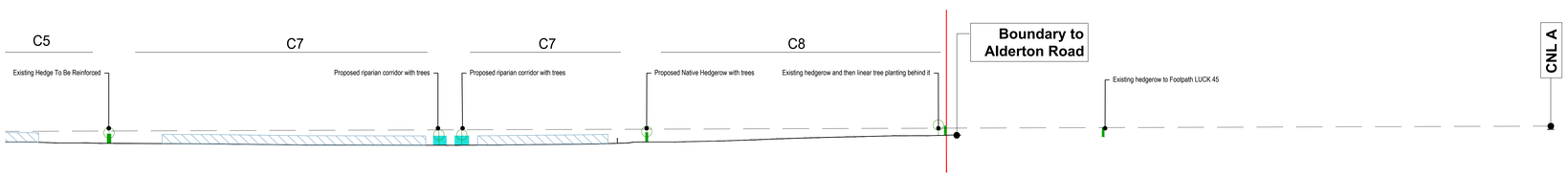
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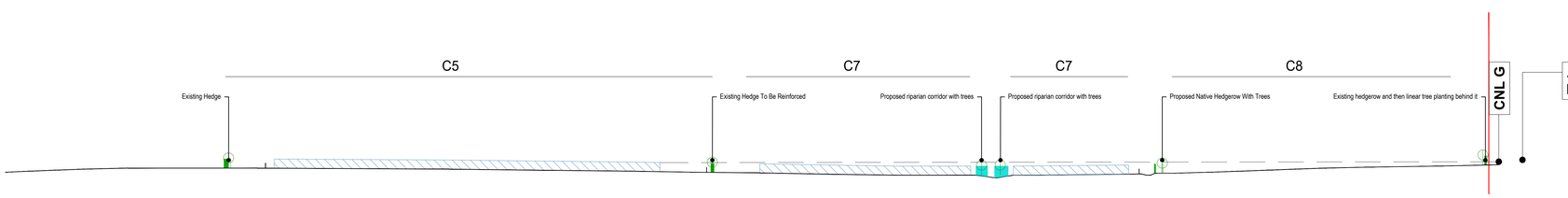
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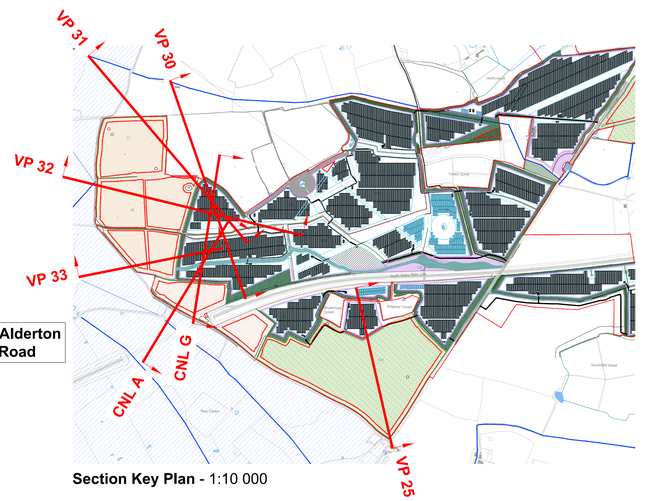
Section VP33- 1:1000



Section CNL A - 1:1000



Section CNL G - 1:1000



Section Key Plan - 1:10 000

Topographical survey or viewpoint coordinate height data used

Line of Sight

Site boundary

Vegetation

Solar installation parameter

These sections have been produced to test the visibility of the scheme.

The sections are based on topographic survey data and where viewpoint locations are beyond the surveyed areas verified height data and grid point reference from the photographic survey (at eye level) have been used.

The sections show existing vegetation and proposed mitigation planting at year 15 with hedgerows at a height of 4.5 metres and proposed trees & treebelts at 7.5 metres.

PURPOSE OF ISSUE: PL - PLANNING SUBMISSION	RIBA STAGE: 3
DRAWING STATUS: S0 - INITIAL STATUS	
PROJECT TITLE: Lime Down Solar Park	
CLIENT: Island Green Power	
DRAWING TITLE: Visability Sections - Sheet 1 of 2	SCALE: 1:1000 @A0
DATE: 02.06.25	DRAWN BY: CW
CHECKED BY: -	APPROVED BY: -
DRAWING NUMBER: PROJECT No. | ORIGINATOR | ZONE | TYPE | DISCIPLINE | FILE | REVISION: 4443-LAN-XX-XX-DR-L-7001-P02	

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Norwich Office: Bretingham House, 58 Pottergate, Norwich, NR2 1DX. Tel: 01603 631 319

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Key

Area For Solar Panels And Associated Development

Existing

- Existing Vegetation
- Existing Ditch Verge
- Existing Footpath
- Existing Bridleway
- Existing Byway Open To All Traffic
- Existing Restricted Byways
- Existing Buildings
- Existing Listed Buildings
- Existing Utilities

Proposed

- Existing Vegetation To Be Retained And Enhanced
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- Proposed Native Woodland Belt
- Proposed Native Woodland Block
- Proposed Riparian Corridor
- Proposed Solar Arrays
- Proposed Fenceline
- Proposed Access Tracks
- Proposed Inverters
- Proposed Substation
- Proposed Battery Energy Storage Systems
- Proposed Permissive Path For Pedestrians
- Proposed Permissive Path For Pedestrians, Equestrians and Cyclists
- Existing Vegetation To Be Removed
- Proposed Indicative Locations For Ponds
- Proposed Locations For Reintroduction Of Historic Ponds

1:2,500 @A0

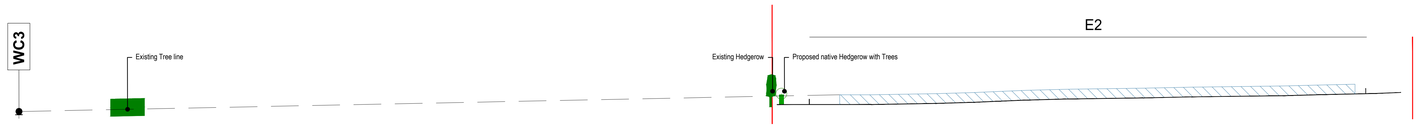
LIME DOWN SOLAR PROJECT

Figure NA.
Lime Down Solar Site E
Key Plan
Viability Sections - Sheet 2

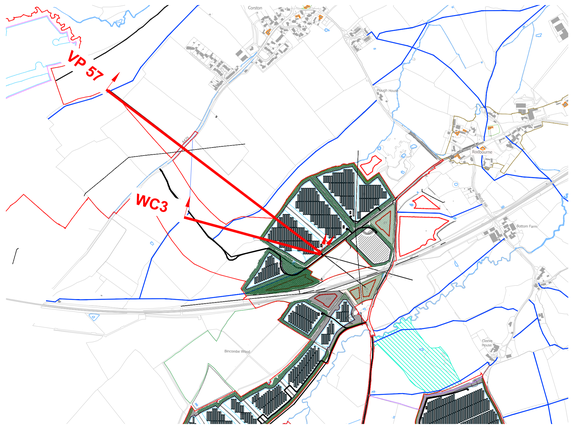
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Section VP57 - 1:1000



Section WC3 - 1:1000



Section Key Plan - 1:10 000

Topographical survey or viewpoint coordinate height data used

Line of Sight

Site boundary

Vegetation

Solar installation parameter

These sections have been produced to test the visibility of the scheme.

The sections are based on topographic survey data and where viewpoint locations are beyond the surveyed areas verified height data and grid point reference from the photographic survey (at eye level) have been used.

The sections show existing vegetation and proposed mitigation planting at year 15 with hedgerows at a height of 4.5 metres and proposed trees & treebelts at 7.5 metres.

PURPOSE OF ISSUE: PL - PLANNING SUBMISSION	RIBA STAGE: 3
DRAWING STATUS: S0 - INITIAL STATUS	
PROJECT TITLE: Lime Down Solar Park	
CLIENT: Island Green Power	
DRAWING TITLE: Visibility Sections - Sheet 2 of 2	SCALE: 1:1000 @A0
DATE: 02.06.25	DRAWN BY: CW
CHECKED BY: -	APPROVED BY: -

DRAWING NUMBER: 4443-LAN-XX-XX-DR-L-7002-**P01**

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Norwich Office
Tel:

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Norwich, NR2 1DX
01603 631 319
lanpro.com

Lime Down
Solar Park

Part B: Section Commentary

Lime Down Solar Park

VP	Description	Receptor	Distance to panels	Effects Year 1	Effect Year 15	Proposed mitigation and distance from VP to mitigation	Notes	[redacted] CNL) Comment received 08/07/2025	[redacted] (Wiltshire Council) Comment received 04/07/2025
VP25	From junction of Fosse Way and Alderton Road looking north	TR145 Fosse Way TR038 Alderton Road RI024 Fosse Lodge	490m	The edge of panels at the northern end of C10 will be visible initially at distance as the land slopes away and there is no existing screening in transient views from Alderton Road. High Sensitivity + Very Low MoC = **Moderate/Minor Adverse Effect (Non significant)**.	Proposed woodland Belt to C10 and new/ gapped up hedgerow to Alderton Road will screen views of panels by Year 15. This will result in a change in the character of views. Although off the matrix scale the Effects are considered to reduce to **Minor Adverse.**	540m to proposed woodland belt. Gapping up of the existing hedgerow to Alderton Road will also screen views.	Also long distance views of panels and infrastructure on rising land to the north of the railway line (not shown on section).	Agree with the comments. Agree unlikely to have significant impact upon the CNL or its setting from this viewpoint.	Due to missing short sections of absent hedgerow along Alderton Road & Fosse Way, I would evaluate visual change effects to be upper end of moderate adverse at Yr1, not moderate/low. This is because receptors would also likely see other panel areas extending on rising ground north of the railway, likely views of upper sub-station development, and views of solar panels to the northeast in field parcels C11, C12 & C36 at year 1 from this viewpoint. In my opinion this would influence your currently assessed 'Very low Magnitude of Change' matrix score for this viewpoint? I would support use of new woodland belt planting along Northern edge of C10 as mitigation to screen the panel areas south of the railway, which could characteristically link the existing woodland coverts located each side of panel areas. In hindsight it would have been useful to extend this section line further north beyond the railway to capture the proposed higher level sub-station infrastructure, which will appear framed between existing woodland coverts from this viewpoint location. I am currently unsure at this stage whether the visual effects would be reduced to Minor adverse at Yr 15 as the upper canopies of this mitigating tree belt are unlikely to offer effective screening at year 15 to the proposed higher level substation infrastructure development proposed north of the railway, although could help filter. New infill hedgerow planting with trees along Alderton Rd. & Fosse Way could help screen / filter views close to VPL source and could help repair and strengthen/enhance the local landscape character here. Therefore, I would agree that the existing open nature of this view would become slightly more enclosed and filtered by this replacement roadside hedgerow and tree planting over time, which I wouldn't consider generating harmful effects to landscape character here.
VP30	From Footpath LUCK 35 looking north. Not in CNL	TP077 LUCK 35 RI018 Racecouse Barn	483m	Narrow corner of panels in C5 is not on perceived ridge '. Existing tree/vegetation on ridgeline will screen. No Effect.	No Effect.	442m to proposed hedgerow with trees on ridgeline between C2 and C5 to stengthen lasndscape character.		Our principal concern here was the potential for panels to intrude upon/block views to the CNL, including the church tower at Alderton. The section illustrates that the panels are not likely to be visible.	View towards narrow northern corner of field unit C5. The proposed 15m standoff buffer to solar panel areas and existing hedge line will likely result in minimal potential to view PV panels over this perceived local ridge line from this VP location, located at lower level. I agree likely **No effect at Yr1** from this VP location. Note: I observe reference to a proposed strengthened hedge line and tree planting along the field boundary between C2 and C5 within your visual assessment table (included within the mitigation column of excel document). This is not currently included / illustrated on the draft LEMP or cross section. I think important to strengthen this hedge line separating fields C5 and C2 as viewed further east from locations along LUCK 35, it may not provide a particularly effective screen in wintertime. I note that many local hedgerows are currently maintained low, reducing their individual and collective screening function, it would be important to identify specified minimum managed hedgerow heights in management plans where they are being relied upon to provide visual mitigation throughout the project's operational life span.
VP31	From Footpath LUCK 35 looking _southeast	TP077 LUCK 35 RS002 Alderton (CA)	794m	Panels in C5 will be screened by existing hedgerow between C6 and C5 due to rising land. No effect.	No Effect.	759m to C5/C6 hedgerow to bre gapped up and new tree line to strengthen hedgerow and improve character.		Viewpoint is in the CNL. Agree with proposed mitigation. Agree that section illustrates panels are likely to be screened from this viewpoint	I agree that there would likely be **No effect at Yr 1** from this VP location and support proposed strengthening of existing field boundary C5/C6. Note: I highlight that the northern boundaries of field parcels C29 and C30 (located on higher ground of local rolling ridge) are not identified to be strengthen on draft LEMP. I anticipate that they probably should be to help screen and filter panel areas located in C29, C30 and C31 located on this local rolling ridge, viewed at longer distance from the north along Church Road (from Sherston) looking southeast from locations of equal or higher topography to panel areas etc.
VP32	From Footpath LUCK 41 looking east	TP071 LUCK 41	633m	Panels in C5 will be screened by existing hedgerow between C6 and C5 due to rising land and the hedgerow to Alderton Road on the Site boundary. No effect.	No Effect.	611m to hedgerow between C6 and C5. 660m to C6/C5 hedgerow. Gapping up and new tree line to strengthen hedgerow and improve character.		Viewpoint within CNL. Agree that section illustrates panels are likely to be screened from this viewpoint.	Panels in C5 likely to be screened by intervening gently rising rolling landform, the Alderton Road hedgerows and C6/C5 field boundary hedgerow from this location, agree likely **No effect at Yr 1.**

VP33	From Footpath LUCK 45	TP080 LUCK 45	482m	Small triangular woodland to Alderton Road (outside Site)predominantly screens views. Panels in C7 will be screened by existing hedgerow between C6 and C7. No effect.	No Effect.	470m to nearest hedgerow.Gapping up and new tree line to strngthen hedgerow and improve character on existing hedgerow between C6 and C7 and along Alderton		Viewpoint within CNL. Agree that section illustrates panels are likely to be screened from this viewpoint.	Nearest panels in C5 would be screened by intervening gently rising rolling landform, an existing small triangular wood, hedgerows lining Alderton Road, and C6/C5 field boundary hedgerow from this location. I would agree that there is likely **No effect at Yr 1** due to removal of field C6 as a panel area.
CNL A	From Footpath LUCK 46	TP079 LUCK 46	549m	Panels in C7 and C5 not visible due to intervening hedgerows along Footpath LUCK 45, Alderton Road and gappy hedgerow to C8/C7 as well as the lower topograhy within C7. No Effect.	No Effect.	Intervening existing hedgerows at 230m, 320m and 500m. Gapping up and new tree line to strengthen hedgerow and improve character of existing hedgerow between C8 and C7 and increasing height of existing hedgerow along Alderton Road.		Viewpoint within CNL. Agree that section illustrates panels are likely to be screened from this viewpoint, particularly if proposed mitigation is provided. Support comments on mitigation.	Some panel areas in C7 and C5 are likely to be visible, as the hedgerow lining LUCK 45 is lower than indicated on the section demonstrated by the wintertime photography (which I accept in winter photographs would be worst case scenario) as the hedges have been recently cut and are not 4.5 metres high as currently included on the section drawing (this hedgerow lining LUCK 45 is also outside the application boundary / management beyond the control of the applicant so should not be relied upon as providing mitigation). The strengthening of field boundaries along northern and eastern boundaries of C8 and southern boundaries of C5 & C29 would be required as visual mitigation in my opinion. It is also likely that there would be potential views of upper western edges of panel areas proposed at the eastern side of C9, viewed over the Alderton Road hedge at Yr 1, until the hedge lining Alderton Rd. increases in height and the new hedge line on the western edge of panel areas in C9 provides screening. I am unable to agree that there would be **no visual effect from this viewpoint at Yr 1, it would likely be minor adverse at Yr 1, reducing to negligible adverse/neutral effect at Yr 15.**
CNL G	From Alderton Road looking north	TR038 Alderton Road	185m	Panels in C7 will be visible in a fleeting view at the field entrance as the existing hedgerow between C8 and C7 is not very strong. However, for the majority of Alderton Road views will be screened by the intervening hedgerow along Alderton Road which will be increased in height. High Sensitivity + Very Low MoC =**Moderate/Minor Adverse Effect (Non significant)**.	Proposed hedgerow and trees between C8 and C7 and existing hedgerow along Alderton Road will screen viewsof panels by Year 15. This will result in a change in the character of views. Although off the matrix scale the overal effects on Alderton Road are considered to reduce to **Minor Adverse (Non significant).**	0m to hedgerow on alderton Road and 170m to existing hedgerow between C8 and C7. Gapping up and new tree line to strengthen the hedgerow between C8 and C7 and increasing height of existing hedgerow along Alderton Road.	Specific view from field entrance not representative of views from Alderton Road as a whole,This is due to intervening hedgerow along the road which will screen views when increased in height.	Agree with the comments, **pending provision of visualisation of panels from this location.**	The existing low and gappy intervening hedgerows illustrated within the presented wintertime VP photography illustrates that some panels in C7, C5 and C29 are likely to be visible at Yr 1, although panels in C7 are likely to screen onward views of panels in C5 and C29 as topography falls slightly to the east (i.e. panels in C5 & C29 are unlikely to add further to potential views of frontage panels along western edges of C7. I would consider this to be a **moderate adverse effect at Yr 1** from this viewpoint, due to nature of view, framed and fleeting view through a hedgerow gap/existing field access. The strengthening of field boundaries along northern and eastern boundaries of C8 and southern boundaries of C5 & C29 will be required as visual mitigation in my opinion if effects are to be reduced by **Yr 15 to minor / negligible adverse.** Note: Wider comments for Alderton Rd currently included under Yr 1 commentary for this specific viewpoint, should also consider the assessment and comments for VP25 for this same receptor.
VP 57	Footpath MALW 52	TP165 MALW 52	976m	Panels on the upper slopes of E2 will be discernible beyond the existing hedgerow and hedgerow trees to the north western boundary of E2 in longer distance cross valley views, especially in winter. Medium Sensitivity + Very Low MoC = **Minor Adverse.**	Adiitional tree planting is proposed along the hedgerow on the north western boundary of E2 which will provide greater screening by Year 15. Although off the matrix scale the effects are considered to reduce to **Negligible Adverse** as a result of the mitigation.	955m to existing hedgerow on north western boundary of E2. Linear tree planting is proposed to the east of the existing hedgerow .		No comment	I believe that cross valley views of panel areas on the upper slopes of field areas E2, E3 and to a lesser extent E4 would be discernible from this viewpoint (not just E2?) through and over existing intervening layers of field boundary hedgerows and trees. It would be important to reinforce northwestern field boundary hedgerows of E1, E2, E3 and E4 in my opinion and manage these hedgerows during operational phase at higher level if greater screening is to be realised and visual effects at yr 1 are to be reduced by yr 15. I would consider the change to be lower **Moderate / minor adverse at year 1, reducing to minor/negligible adverse at year 15** with effective mitigation planting.
WC 3	From Bridleway MALW 54	TP169 MALW 54	378m	Panels within E2, E3 and to a lesser extent E4 will be discernible beyond the existing hedgerow and hedgerow trees to the north western boundary of E2. This will be seen in conjunction with the existing Corston solar scheme at 1525m to the northeast of the VP. Medium Sensitivity + Very Low MoC = **Minor Adverse.**	Adiitional tree planting is proposed along the hedgerow the western boundary of E2 which will provide greater screening by Year 15. Although off the matrix scale the effects are considered to reduce to **Negligible Adverse** as a result of the mitigation.	344m to hedgerow on north western boundary of E2.	Panels will be seen in conjunction with the existing Corston solar scheme at 1525m to the northeast of the VP.	No comment	VP WC3 – From junction of Bridleway MALW 54 and Footpath MALW 53 looking southeast (viewpoint photography looking northeast), section on southeast alignment. This viewpoint does include a glimpse of part of the existing operational Rodbourne Rail Solar farm to the north. Views of panels in E2, E3 and lesser extent E4 would be viewed from this viewpoint location over the existing low intervening hedgerows and under between the mature hedgerow trees. Further south along MALW53 looking southeast views of panel areas in E1 are also likely over the existing low hedgerows and under between hedgerow trees? I would support strengthening all existing field parcel hedgerows and introducing additional tree planting, allowing hedgerows to grow taller and manage hedgerows at these taller heights for operational phase. I would consider the change effects to be **moderate / minor adverse at year 1, reducing to minor/negligible at year 15** with effective mitigation planting based on the viewpoint location photography and consideration of extending view panorama slightly further south to capture E1 and potential for retention of the access track along MALW 54 during operational phase? Note: It is probable that panels in southern part of E1 would also be visible from this VP location if the photograph panorama extended slightly further south? You have referenced C7 & C8 within the 15 yr effects column, this is obviously an error, and correct reference to ‘E’ parcels need to be substituted.

Annex G NV1.9 - Daytime Operational Noise Contours and PRoW

385000

390000

185000

180000

Easton Grey

Sherston Parva

Easton Town

Sherston

Malmesbury

Corston

Hullavington

Hullavington Airfield

Lower Stanton St Quintin

Stanton St Quintin

Gritleton

Foscote

Leigh Delamere

Clanville

Kings Heath

Pinkney Park

Foxley

Common Rd

Park Rd

Grange La

River Avon

Foxley Brook

Union Brook

Gauze Brook

Clappote Brook

Gritleton Stream

B4040

M4

J17

B4122

Lime Down Solar Park

Title: Figure NV1.9: Daytime Operational Noise Contours and PRoW

Document: ExA WQ NV1.9

Legend:

- Order Limits
- Noise Study Area

PRoW

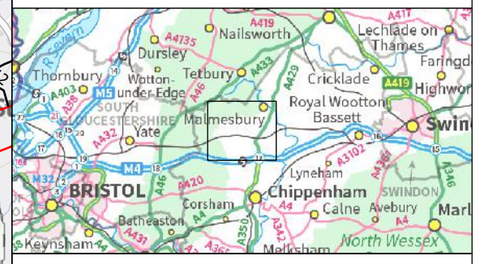
- Bridleway
- Byway
- Footpath

Operational Noise Contours $L_{Aeq,16h}$ dB at 1.5m (Free Field)

- <=30
- >30 to <=32
- >32 to <=34
- >34 to <=36
- >36 to <=38
- >38 to <=40
- >40 to <=42
- >42 to <=44
- >44 to <= 46
- >46 to <=48
- >48 to <= 50
- >50

Data: IGP, 2024

Base map: © Crown copyright and database rights 2024 Ordnance Survey 0100031673. Contains OS data © Crown Copyright and database right 2026. Contains data from OS Zoomstack



APFP Regulation: 5(2)(a)

Application Doc No.: APP/6.2

Drawing no.: NV1.9

Coordinate system: British National Grid

Scale: 1:33,000 @ A3

0 1 2 km

Island GREEN POWER

AECOM

Annex H NV1.10 - Approximate Distances between the BESS Area and Substations and Non-Residential Receptors

Scheme Element	Pastoral Farm Buildings (from available information)	PRoW	Stud Farm Facilities (from available information)	Permissive Paths	Wildlife Sites	Presence of Fauna (from available information)
BESS Area	Approximately 1.4 km south of the BESS Area (Hawker Farm)	Approximately 350 m southwest of the BESS Area (WT/HULL/24).	Approximately 675 m west of the BESS Area (Townlease Farm).	Approximately 480 m northeast of the BESS Area.	Approximately 1.8 km southwest of the BESS Area (Surrendell Wood Local Wildlife Site (LWS)).	Approximately 490 m southwest of the BESS Area (fields associated with Hawker Farm)
400 kV Substation	Approximately 680 m north of the 400 kV Substation (Manor Farm)	Approximately 240 m southwest of the 400 kV Substation (WT/HULL/24).	Approximately 300 m west of the 400 kV Substation (Townlease Farm).	Approximately 510 m northeast of the 400 kV Substation.	Approximately 1.5 km southwest of the 400 kV Substation (Surrendell Wood LWS).	Approximately 350 m northwest of the 400 kV Substation (fields associated with Manor Farm)
132kV Substation (Lime Down A)	Approximately 430 m north of the 132 kV Substation in Lime Down A (unknown farm holding)	Approximately 150 m west of the 132 kV Substation in Lime Down A (WT/SHER/16).	Approximately 540 m east of the 132 kV Substation in Lime Down A (LC Dressage)	Approximately 145 m east of the 132 kV Substation in Lime Down A.	Approximately 930 m south of the 132 kV Substation in Lime Down A (Lord's Wood LWS).	Approximately 175 m northwest of the 132 kV Substation in Lime Down A (fields associated with an unknown farm holding)

Scheme Element	Pastoral Farm Buildings (from available information)	PRoW	Stud Farm Facilities (from available information)	Permissive Paths	Wildlife Sites	Presence of Fauna (from available information)
132kV Substation (Lime Down C)	Approximately 950 m north of the 132 kV Substation in Lime Down C (Commonwood Farm)	Approximately 400 m east of the 132 kV Substation in Lime Down C (WT/LUCK/57).	Approximately 1.8 km east of the 132 kV Substation in Lime Down C (Townlease Farm).	Approximately 60 m north of the 132 kV Substation in Lime Down C.	Approximately 860 m northeast of the 132 kV Substation in Lime Down C (Lord's Wood LWS).	Approximately 700 m north of the 132 kV Substation in Lime Down C (fields associated with Commonwood Farm)
132kV Substation (Lime Down D)	Approximately 430 m southeast of the 132 kV Substation in Lime Down D (Kingsway Barn Farm (assumed)).	Approximately 25 m southeast of the 132 kV Substation in Lime Down D (WT/HULL/8).	Approximately 925 m north of the 132 kV Substation in Lime Down D (West Park Farm/Bundaberg).	Approximately 210 m north of the 132 kV Substation in Lime Down D.	Approximately 1.3 km southeast of the 132 kV Substation in Lime Down D (Bincombe Wood LWS).	Immediately south of the 132 kV Substation in Lime Down D (fields associated with Kingsway Barn Farm (assumed))
132kV Substation (Lime Down E)	Approximately 430 m east of the 132 kV Substation in Lime Down E (Bottom Farm (assumed))	Approximately 140 m northeast of the 132 kV Substation in Lime Down E (WT/MALW/68).	Approximately 1.5 km south of the 132 kV Substation in Lime Down E (Drewmain Stud).	Approximately 850 m southwest of the 132 kV Substation in Lime Down E.	Approximately 20 m west of of the 132 kV Substation in Lime Down E (Rodbourne Plantation LWS).	Approximately 30 m south of the 132 kV Substation in Lime Down E (fields associated with Bottom Farm (assumed))

Annex I SE1.7 - Indicative Diversion Route to PRoW

386200 386300 386400 386500 386600 386700 386800 386900

180500 180400 180300 180200 180100 180000 179900

Grittleton

Sports Pavilion

Track

Track

Cricket Ground

Malta Green

Hall

Pond

Malmesbury Lodge

Wych Elm

The Old Hall

Meze-Stead

Fairlawn

South View

Windmillcottage

Woodlands

Path (um)

Chapel

Path (um)

Tennis Courts

Path (um)

Pond

Pond

116.9m

117.9m

115.7m

112.2m

114.2m

9a/i

9a/ii

9a - WT|GRIT|20

Lime Down Solar Park

Title: Figure 1-1: Indicative Diversion Route to PROW WT|GRIT|20 During Construction and Decommissioning

Document:
Applicant's Response to First Written Questions
SE1.7 Public Rights of Way Network
Temporary Diversions

Legend:

- Order Limits
- Indicative Diversion Route

Public Right of Way (PRoW)

- Footpath
- Bridleway
- BOAT

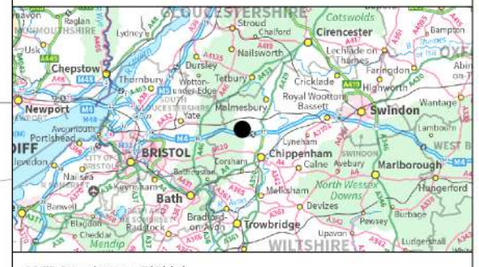
PRoW to be temporarily stopped up

- Footpath
- Bridleway
- BOAT

PRoW to be temporarily stopped up - start and end points – refer to Schedule 6 of the draft Development Consent Order EN010168/APP/3.1

- Footpath
- Bridleway
- BOAT

Data: IGP, 2026
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APFP Regulation: 5(2)(a)

Application Doc No.: EXAM/9.29

Drawing no.: P4443-LPR-ZZ-XX-DR-Z-PRJ-0368

Coordinate system: British National Grid

Scale: 1:2,500 @ A3

N W E S

0 50 100 150 Meters

Island GREEN POWER

Lanpro

391800 391900 392000 392100 392200 392300 392400 392500

183300 183200 183100 183000 182900 182800 182700

78.6m

Issues

78.9m

MS

A429

6b/i

6c/i

6c - WT|MALW|53

6c/ii

Dedicated crossing point for PROW users to cross proposed construction access

6e/i

6e - WT|MALW|55

6d - WT|MALW|53

6d/i

6e/ii

6b - WT|MALW|54

Pond

Pond

Pond

Dedicated crossing point for PROW users to cross proposed construction access

6b/ii

6f/ii

6f - WT|MALW|60

Lime Down Solar Park

Title: Figure 1-2: Indicative Diversion Route to PROW WT|MALW|54 During Construction and Decommissioning

Document:
Applicant's Response to First Written Questions
SE1.7 Public Rights of Way Network
Temporary Diversions

Legend:

- Order Limits
- Indicative Diversion Route

Public Right of Way (PRoW)

- Footpath
- Bridleway
- BOAT

PRoW to be temporarily stopped up

- Footpath
- Bridleway
- BOAT

PRoW to be temporarily stopped up - start and end points – refer to Schedule 6 of the draft Development Consent Order EN010168/APP/3.1

- Footpath
- Bridleway
- BOAT

Data: IGP, 2026
Base map: © Crown copyright and database rights 2026 Ordnance Survey 0100031673.



APFP Regulation: 5(2)(a)

Application Doc No.: EXAM/9.29

Drawing no.: P4443-LPR-ZZ-XX-DR-Z-PRJ-0368

Coordinate system: British National Grid

Scale: 1:2,500 @ A3

0 50 100 150 Meters

Island GREEN POWER

Lanpro