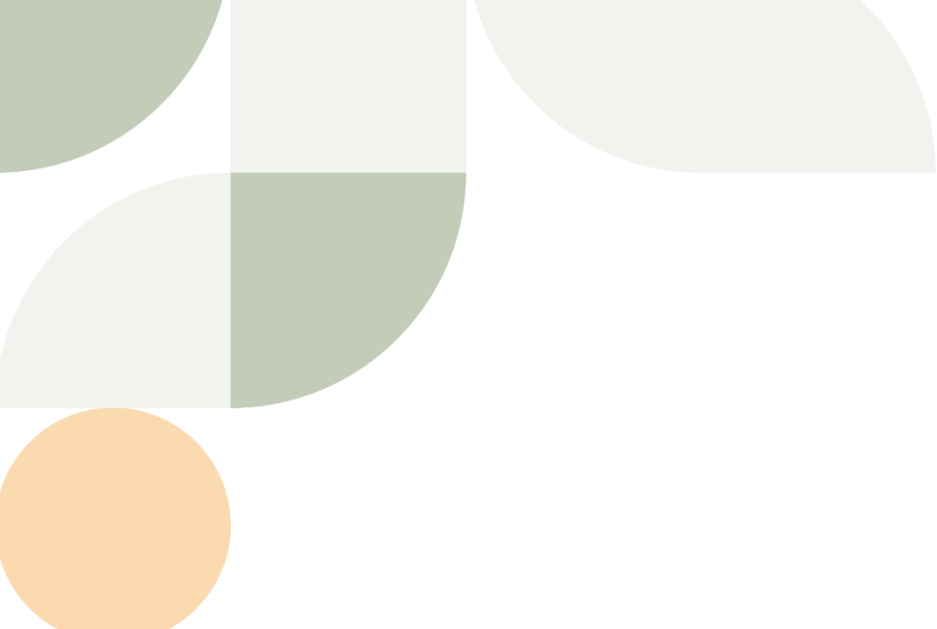




Lime Down

Solar Park

Written Summary of the Applicant's Oral Submissions and Responses at Issue Specific Hearing 3 and Responses to Action Points

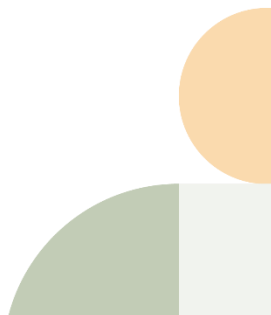
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The Infrastructure Planning (Examination Procedure) Rules 2010



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1 Summary of Oral Submissions at Issue Specific Hearing 3

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1.Welcome, housekeeping, purpose of the hearing, participant introductions	The ExA introduced the hearing and made some preliminary remarks. The purpose of the hearing is to address matters raised by the ExA following its consideration of the application documents. The following parties introduced themselves during ISH3. Applicant: • Claire Brodrick, Partner, Pinsent Masons LLP (solicitors for the Applicant) • Peter Timms, Ecologist at Clarkson & Woods Ltd • Christopher Jackson, Director of Landscape Architecture at Lanpro • James Darrall, Transport Consultant at TPA Wiltshire Council Odette Chalaby, Barrister at Landmark Chambers (Counsel for Wiltshire Council) • Emma Fisher, Senior Ecologist • Kate Tate, Arboricultural Officer • Lisa Price, Arboricultural Officer Stop Lime Down

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	• Celia Reynolds, Barrister at 39 Essex Chambers (Counsel for Stop Lime Down) • Nicholas Valori, Senior Ecologist at Betts Ecology Environment Agency ("EA") • Laura Edwards, Planning Specialist • Josephine Bujor-Humphreys, Biodiversity Technical Specialist • William West, Fisheries Technical Specialist
2. Traffic and Transport	
2.1 Construction HGV and AIL Routes	The ExA noted the primary concern raised by the interested parties is the use of rural roads by construction vehicles. Similarly, the Cotswolds National Landscape Board has raised concerned about the Applicant's selection of routes through the National Landscape Area and whether the most suitable route options have been selected. The ExA was interested in hearing alternative route options considered and discounted by the Applicant, inclusive of AIL and requested that these be made visible on screen. James Darrall for the Applicant provided an overview of route selection and the Applicant's reasons for its decisions. The majority of trips are coming from strategic road network so there are two construction routes which has the benefit of a reduced number of trips on each route. It is common with any other DCO solar farm to use rural roads and in practical terms the Applicant sought to avoid routes with limited visibility and accident hotspots, schools, village residential centres, extensive lengths of single tracker carriageway (3m wide road). Vegetation removal requirements were also factored into the selection process.

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	Mr Darrall provided an overview of the route, coming off a motorway junction, then getting onto an A road suitable for HGVs, then two B roads, running along west of Grittleton, then Alderton Road and Fosse Way. The alternative route through Norton was discounted as it comprises limited single-track road with limited visibility. This position was confirmed by Wiltshire Council and Stop Lime Down that this was the best of the alternative routes for A, B and C. As for D and E, the Applicant proposes Junction 17 with deliveries outside of peak hours and then the A429 going north which is an existing HGV route. This avoids going through Norton and provides direct and quick access to the motorway network. In terms of the cable route access in Grittleton, alternative routes to get to those two access points are to drive through Lavington village which is unacceptable. Approximately 4 estimated HGV movements per day are estimated. The ExA asked whether existing traffic flows on the relevant road had been taken into account. Mr Darrall confirmed they had. The ExA further asked whether there had been any specific other discussions around AIL routes. Mr Darrall confirmed the same process was followed, with a focus on using the widest roads possible. Mr Darrall noted AIL deliveries are managed and escorted with special management measures in place, dealt with outside the DCO through a special order. The Cotswolds National Landscape Board (not present at the hearing) had expressed concern over routes running through rural landscapes. The ExA noted the Applicant had tried to avoid central villages, severance and non-motorised users and queried whether there had been any consideration to avoid the Cotswolds National Landscape specifically. Mr Darrall confirmed the route is a consequence of the location of the site, with a technical note submitted to explain the

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	route. The A46 already has an existing HGV presence. Construction is temporary, which reduces long-term impact, and no alternative suitable routes were identified. The Cotswolds National Landscape Board [REP3-154] had stated that if alternative routes outside the landscape are deemed unsuitable and the only suitable route travels for a significant distance through the landscape, the Board considers the project has not been sensitively designed and would question if the site is in the correct location for a development of this nature and scale. The ExA asked whether the Applicant would be providing a more detailed response to this point. Ms Brodrick on behalf of the Applicant noted that the board's comments relate to the site selection process, which was discussed at ISH1, and that transport links formed part of the consideration in finding a suitable location. Mr Darrall explained that once a site is selected, the process of identifying the most suitable construction routes is then undertaken, focusing on major strategic routes and appropriate roads for HGV movements. The Applicant's position is that they are appropriate roads to use for HGV movements and confirmed it would clarify the number of HGV movements later in the session. A technical note on tranquillity from a noise perspective linked to traffic movements and what is proportionate. The exercise conducted from a highways perspective confirmed the route selected is the most suitable, and that no suitable route avoiding the national landscape exists. DK on behalf of Stop Lime Down questioned whether the site selection process was appropriate and noted that the existence of a planning constraint should not be ignored simply because no other alternative exists. BB on behalf of Stop Lime Down noted disagreement that this represents the best route, characterising it as the least worst selection, and observed that the criteria used to avoid inappropriate routes — such as narrow roads, lack of visibility, and villages — are themselves present on the selected route. The Applicant's position is that tranquillity is a landscape matter rather than a transport matter. BB was the transport witness at

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	Mitten and gave evidence that the development would generate traffic within the national landscape and expressed concern that it would exceed the 10% tranquillity threshold, which is Rule 2 from the IESB guidelines. Insufficient information was said to have been provided on transport modelling to demonstrate the 10% threshold would not be breached. Stop Lime Down maintained that transport is an important element of tranquillity and that whilst construction is temporary, the 2-year period represents a significant environmental impact. Reference was made to Section 10, [REP1-172], where the previous inspector's decision is discussed. Odette Chalaby on behalf of Wiltshire Council agreed there will be a significant impact on the Cotswolds National Landscape. From a highways perspective, the routes selected are suitable in context and there is no radically better alternative solution. The Council's greater concern was how to manage traffic appropriately. Mr Darrall confirmed that the example stated by Mr Bamber and included in [REP1-172] related to a 500-unit housing development, sited in the CNL that would result in a permanent increase in traffic, so was not comparable. Mr Darrall confirmed the tranquillity note has been submitted and a further note is to be provided which will consider noise as a result of traffic. The ExA raised specific construction route location queries and referred to ES Volume 2, Figure 13-5 Abnormal Load Routes - Solar PV Sites [APP-150] showing the main AIL construction routes to the solar PV sites. The Outline Construction Traffic Management Plan (CTMP) [REP3-108] contains details of the AIL construction plans for Routes 1–4. The orange route (Route 1) runs from M4 junction 18 along the A46 north to the B4040 at Old Sodbury, then B4039 towards Grittleton, Alderton Road, and the Fosse Way. <i>Post Hearing Note:</i>

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	<i>ES Volume 2, Figure 13-5 Abnormal Load Routes - Solar PV Sites [EN010168/APP/6.2] (Revision 2) has been updated and submitted at Deadline 4. In addition, the AIL route numbering for Solar PV Sites has been updated at paragraph 1.7.11 of ES Volume 3, Appendix 13-1: Transport Assessment [EN010168/APP/6.2] (Revision 4) and at paragraph 5.3.1 and Appendix D of the Outline CTMP [EN010168/APP/7.22] (Revision 4) submitted at Deadline 4.</i> However, on page 122 of the Outline CTMP [REP3-108] it states that after leaving the M4 Junction 18 on the A46, instead of traveling north to Old Sodbury and taking the B4040, an alternative route would take vehicles from the A46 to the B4039 via Acton Turville Road and Tormarton Road. The Applicant demonstrated the route on screen by cursor. The ExA asked at what point an alternative route would be considered. Mr Darrall confirmed the haulage company was given another option but concluded the orange route is the most suitable, with the haulage company determining the appropriate vehicle type. The ExA noted that if the alternative route is to be retained as an option, it should be shown on the construction route plans or annotated on the plans, rather than being described in writing only, so it can be seen and assessed by other parties. Ms Brodrick on behalf of the Applicant confirmed they would take this point away and, if the alternative route remains, would update the plan accordingly; if not, the wording would be updated to remove the reference. <i>Post Hearing Note:</i> <i>ES Volume 2, Figure 13-5 Abnormal Load Routes - Solar PV Sites [EN010168/APP/6.2] (Revision 2), the Outline CEMP [EN010168/APP/7.22] (Revision 4) and ES Volume 3, Appendix 13-1: Transport Assessment [EN010168/APP/7.22] (Revision 4) has been updated to remove the route between Tormarton and Acton Turville. The alternative AIL route through Yatton Keynell has also been removed.</i>

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	The ExA noted a weight restriction on Tormarton Road for vehicles over 7.5 tonnes and queried whether this applied. The restriction is expressed as "except for access." Wiltshire Council was not certain of the position on this point, as it falls outside their area. The ExA directed a written question to South Gloucestershire on this point. Ms Brodrick on behalf of the Applicant noted that the Applicant would need to demonstrate the road was suitable and set out the requirements for pre- and post-construction survey work to be undertaken. The point would be moot if the alternative route is removed. Ms Chalaby on behalf of Wiltshire Council noted, that any traffic regulation order with an "except for access" provision relates to access within the site and not for through traffic. Referring to page 51 of the Outline CTMP [REP3-108] and ES Volume 3, Appendix 13-1: Transport Assessment [REP3-065], a red section highlights highway improvement works involving a one-way section and contraflow, The ExA asked what measures would be required to use the one-way system as a contra-flow for construction vehicles. Mr Darrall confirmed that each AIL movement accessing Lime Down A, B, and C will require traffic management measures as part of the licence requirements. The road would be temporarily suspended to allow vehicles through, agreed through the licensing process, conducted out of hours to minimise impact with appropriate notifications to the highways authority. Vehicles would be escorted. A rolling closure of the road is the standard process for AIL movements and no specific provisions are included in the DCO. Wiltshire Council was not certain of the notice periods and confirmed they would respond in writing. Referring to page 148 of the Outline CTMP [REP3-108], the ExA raised a query about The Gibb on construction Route 1, where an AIL carrier is tight on the boundary line with a farm. The ExA noted the proximity of the first farm on an unaccompanied site inspection and observed that parked cars outside the Salutation Inn could represent an impediment to AIL movements that would interfere with the route. The ExA asked whether any dialogue had taken

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	place with the owner of Firs Farm, particularly given the proximity when running along that section. The Applicant noted that overrun metal matting would cause damage to planting but that this would be restored to its original condition. Ms Brodrick on behalf of the Applicant confirmed this was unknown at the time of the hearing. Mr Darrall noted the public highways boundary at that location goes all the way up to the wall and there is planting that has been done on public highway. The AIL vehicle will employ measures such as special matting. Ms Brodrick on behalf of the Applicant confirmed they will need to check if there has been any dialogue with the owner. <i>Post Hearing Note: Please refer to the Applicant's response to Action Point 2 at Section 2 (List of Actions for the Applicant and Other Parties following Issue Specific Hearing 3) of this written summary.</i> On the Grittleton crossroads, the ExA noted that no more than a temporary removal of the stop sign due to vehicle oversail was proposed and that no swept path had been submitted. The ExA noted a loss of tree cover at this location and asked for an explanation. Mr Darrall explained that the swept path had been omitted from a previous report submitted at Deadline 3. ExA asked for confirmation of where the swept path document sits, Mr Darrall noted the Applicant would confirm. <i>Post Hearing Note:</i> <i>The AIL swept path for Grittleton Crossroads is set out in Annex H of ES Volume 3, Appendix 13-1 Transport Assessment [REP3-065] (page 956).</i>

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	Mr Darrall confirmed that metal plating or matting would be used in this location, that there would be no other vehicle movements, and that the total available space would be used. The ExA referred to loss of tree cover discussed at the site inspection. Mr Threlfall believed the swept path document would confirm the position there. Ms Chalaby confirmed the notice period is 2 clear working days to the police, with 5 working days required for the authority to check for any structures on the route that would impede passage. Ms Brodrick on behalf of the Applicant confirmed there is no need to remove trees in this area. Reference was made to Rep 3066, the updated transport assessment, page 982, Annex J. The ExA asked about the alternative routes for Lime Down A and C (AIL), specifically whether Yatton Keynell could be an alternative. Mr Darrall referred to the purple route — A350, A420 — noting that AIL access to the north goes via Grittleton but does not go south of the railway line, it only goes as far as the construction compound as Fowlswick Lane. Mr Darrall confirmed the Applicant checked there is sufficient manoeuvring space for an AIL load of that type and that it would submit a plan showing this. <i>Post Hearing Note:</i> <i>The Applicant has provided AIL swept paths ES Volume 3, Appendix 13-1 Transport Assessment [REP3-065]. All AIL swept paths show the AIL vehicle entering and exiting each access. On exit, the cab is unhitched from the front of the trailer and driven to the back of the trailer and hitched up, then drives off in forward gear. A turning area for the whole AIL vehicle and trailer is not required as the AIL trailers are modular. ES Volume 2, Abnormal Load Routes - Solar PV Sites [EN010168/APP/6.2] (Revision 2) and ES Volume 2 Figure 13-6</i>

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	<i>Abnormal Load Routes - Cable Route Corridor [EN010168/APP/6.2] (Revision 2 have been updated and submitted at Deadline 4. The update figures show AIL routing to the cable route compound on Fowlswick Lane.</i> <i>A plan is provided for Fowlswick Lane which is set out in Annex D of ES Volume 3 Appendix 13-1: Transport Assessment [REP3-065] (Drawing PL109B).</i> Mr Bamber on behalf of Stop Lime Down raised the issue of notice periods for AIL, noting a temporary traffic regulation order may be required. Mr Bamber requested the Applicant to confirm information on the process and what steps need to happen. Other road traffic regulations were noted to be covered separately. <i>Post Hearing Note:</i> <i>The process for providing notice and the standard AIL process is now included at paragraph 5.5.2 to 5.5.3 in ES Volume 3, Appendix 13-1: Transport Assessment [EN010168/APP/7.22] (Revision 4) and at paragraph 1.7.17 to 1.7.18 of the Outline CTMP [EN010168/APP/7.22] (Revision 4) submitted at Deadline 4.</i>
2.2 Construction Traffic - HGV Forecasting	The ExA asked parties to focus on overall HGV numbers and the increases on individual routes. The Stop Lime Down transport report, REP 1172, was noted as providing a realistic estimate over the 2-year construction period of 65,813 movements as opposed to 26,086 movements predicted by the Applicant. The Council raised concerns over the assumptions in the Applicant's assessment. The Applicant's response to written representations had failed to respond to a technical report from Stop Lime Down, having only responded to the summary version and not the full appendix. The ExA noted it would be more helpful to receive a full rebuttal with a detailed response.

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	Mr Darrall on behalf of the Applicant explained that numbers and the bill of quantities (BOQ) were derived by providing draft layouts to contractors, who provided different delivery and quantity estimates, which then inform contractors for the tender process. An initial allowance was made for 600,000 solar PV panels (1,200 deliveries), based on standard containers, assuming 500 panels per HGV. If high-cube containers are used (720 panels per delivery), this would allow for 864,000 solar panels with the same number of deliveries. Stop Lime Down assumed 4,308 deliveries and had not split out mounting structures. Assuming mounting structures make up 31% of deliveries (1,336 deliveries), leaving 2,971 panel deliveries assuming high-cube containers — implying 2,139,000 panels. The Applicant noted Stop Lime Down's panel numbers are approximately 1.5 times what would be expected given the energy producing area on site, representing a significant overestimation of panel numbers. Further differences identified by the Applicant included: Stop Lime Down's assumed weight per HGV of 25 tonnes reduced to 21 tonnes; panels secured by metal posts rather than concrete footings in some areas; the Applicant assumed 38,000 sqm for the substation area whereas Stop Lime Down assumed 42,500 sqm. For the 132kV substation, Stop Lime Down assumed 9,000 sqm compared to the Applicant's 3,450 sqm, which doubles the number of trips. Stop Lime Down's BESS area was assessed as larger than the actual compound area. Stop Lime Down overestimated the depth of BESS access tracks using 0.5 where in the document it ranges from 0.2 to 0.5. Overestimation for general fencing and landscaping section including number of compounds. On topsoil, Stop Lime Down assumed 10% would be taken off site compared to the Applicant's 5%. The Applicant considered this to be consistent double counting. The ExA asked Mr Bamber whether Stop Lime Down was looking at a worst-case scenario. Mr Bamber responded that their figures were based on compliant sites consistent with the latest drawings submitted.

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	Mr Darrall on behalf of the Applicant maintained that even if figures were exaggerated, Stop Lime Down's figures could not be reached and that they only got to 1,390,800. The Applicant attempted to get to the largest possible number to compare its position with Stop Lime Down's and found they remained very far apart. Any change to the numbers used in the transport assessment would have an impact on other assessments, and alignment of figures across different sections considering rounding up and 50% uplift. Mr Darrall confirmed the figures used were for assessment purposes, with other assessments incorporating a rounding allowance and 50% uplift. The Applicant tried to take the maximum number of panels possible and still arrived at a figure far lower than Stop Lime Down's. The ExA asked how the total number of movements would be controlled. Mr Darrall confirmed that when the final traffic management plan is submitted, the table would be updated. The Applicant would need to demonstrate that any new figures do not give rise to materially new or different environmental impacts. Environmental impact assessments would be signed off by the local authority and finalised at detailed design stage, based on the outline figures. Ms Brodrick confirmed that having more than 864,000 panels is unlikely based on current technology and the space available within the site, though detailed design has not yet been completed. Numbers are based on fixed panels; if tracker panels are used, the number could be lower. Mr Threlfall noted figures also come from an engineering procurement contractor who has developed solar schemes of this scale before. The Applicant noted that transitioning at Island Green Power as a developer to become an independent power provider. The ExA asked how much monitoring is done on other solar schemes in respect of traffic and whether this can be relied on. Mr Darrall confirmed that transport figures for other schemes cannot be verified as they are not publicly monitored. The ExA asked how much reliance the Applicant places on other DCO schemes in its estimation. Mr Darrall referred to Cleath Hill as an

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	example of an actual scheme of comparable scale. Ms Brodrick clarified that traffic on other schemes is monitored but the data is not publicly available but data has been used from previously consented schemes and looking at internal knowledge and IGP. Reference was made to Table 2 in Mr Bamber's assessment, which compares Lime Down with other consented schemes. The ExA asked why Lime Down is expected to generate HGVs at such a low rate compared to other projects. Mr Darrall noted that 748 is the works area 1 figure rather than the 469 figure used for comparison. The ExA queried whether the uplift actually applied is lower than 50% when accounting for the removal of spoil and building areas. Mr Darrall confirmed there are 68 conversion units which could be 166 with two on each site, but the draft layout had 68 in it. Mr Darrall clarified that going up to 166 does not add many more trips and that the 50% represents only part of the buffering included in the Applicant's assessment — for example, the assessment assumed all access tracks are aggregate (not consistent with aerial photographs of built-out solar farms); aggregate density 2 ton per cubic metre; standard 20-foot containers were assumed for panel deliveries; a 4,000kV substation was assumed to be built over 6 months rather than a longer period, producing higher trips over a shorter period; all trips were assumed to be built out concurrently; rounding to the nearest 10 was included; and peak activity was assumed to occur every day for 2 years. Mr Bamber noted that 748 is the works area 1 figure and that the table is a like-for-like comparison of the same figure taken from the other schemes. Mr Bamber on behalf of Stop Lime Down noted several areas of persistent difference: 0.3m depth was assumed for construction access on all areas except BESS and substation; no concrete footings were assumed; the assessment at Appendix D and Rep 127 was referenced. Mr Bamber managed to reduce some differences in relation to the number of HGV deliveries per unit area.

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	Each panel is 3.1m square; dividing panel area by total area gives a figure over 50% greater than the 600,000 panel figure used by the Applicant. Mr Bamber stated that an uplift should also be applied to mounting structures. If larger containers are used, even if all deliveries used the largest containers, 1,351 HGVs would result rather than 1,200. If 500 panels per vehicle, 1,945 deliveries would result. Mr Bamber raised concerns regarding waste, noting conflicting information as to whether waste is allocated to a general category or whether any specific allowance has been made for spoil, given that compactors on site could reduce the number of HGVs. On BESS units, Mr Bamber noted that the units are too large to be transported individually and would need to be split into two, otherwise they would be AILs. If split into two, 540 deliveries would result rather than 425. On foundations, Mr Bamber noted this is one of the largest contributions to HGV movements. The Applicant assumed a 0.3m base throughout. Mr Bamber is not convinced that 0.3m depth applies across all components, as substations must support heavy components and equipment. No allowance has been made for drainage requirements for BESS, fire water containment, or the large quantities of gravel required. Mr Bamber considered the fire water strategy insufficient for calculation purposes and stated that supporting structures associated with substations — beyond just foundations and AIL — have not been properly accounted for. On access tracks, Mr Bamber noted an overestimation. Mr Bamber identified parts that would need to be properly surfaced with an adequate thickness of aggregate and surface, with some access capable of being undertaken for maintenance purposes only. The assessment does include landscaping which was not mentioned by Mr Darrall. Calculations were based on compound sizes consistent with the latest drawings, and the compounds may need to be bigger — allowing for 50m x 60m. Mr Bamber stated the general category of HGV movement covers only aggregate for surfacing of those compounds, and does not encompass all other elements of the site, in disagreement with the Applicant's position.

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	Mr Bamber further noted that if looking at the 50% uplift not applied to daily variation but to allow for things not properly allowed for we lose the allowance for the day-to-day variation., The ExA asked whether, on reassessment, the updated assessment would look at individual routes. Mr Bamber confirmed that Appendix D of Stop Lime Down's assessment contains a spreadsheet that converts headline figures into daily figures on individual links and identifies where there are particular problems on specific routes — for example, Grittleton to the two cable access points. Mr Bamber confirmed it was proposing to produce an updated estimate of HGV numbers, likely to be lower than the first Stop Lime Down estimate following more information from the application but still approximately double the Applicant's current figure. This will be circulated and tweaked if needed. Mr Bamber proposed to produce something that shows there are going to be some parts of the site experiencing more vehicle movements and a plan to show what the implications are. Wiltshire Council confirmed it had not conducted detailed calculations of its own. The Council's overarching position is that no control has been proposed over HGV movements, and the risk the Council wants to avoid is significant overestimation or underestimation going unchallenged. The Council wants the ExA to have confidence that the figures are realistic and that the concerns raised by Stop Lime Down have been properly addressed. The Council remains concerned that Mr Bamber's issues have not been sufficiently responded to and proposed to review Mr Bamber's next submission and respond in writing. Mr Bamber's assessment is to be submitted at Deadline 4, with a caveat that more information from the Applicant will be required. The ExA confirmed it would accept a late submission on this occasion from Mr Bamber, with an opportunity for the Applicant to respond by Deadline 5. Mr Darrall proposed a further meeting with Stop Lime Down and Wiltshire Council to discuss the magnitude of the impact. The Applicant confirmed it would provide Mr Bamber with relevant information as soon as possible.

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	<i>Post Hearing Note:</i> <i>The Applicant is still in the process of engaging with Wiltshire Council and Stop Lime Down on these matters and will provide a response at Deadline 5.</i> Mr Kozelko on behalf of Stop Lime Down noted that the Applicant had not responded to the point that the figures used in the Table 2 assessment differ from those used in other projects and that the Applicant is indicating it has not assessed a reasonable worst case. Ms Brodrick confirmed they would come back to this in writing but the difference relates to: the figure for the area where solar panels can be placed not including where cabling takes place; the maximum number of panels that can be placed in the relevant area excluding Works Number 1D (cable only); and a separate point regarding how this relates to other projects. On West Bruton, Ms Brodrick noted that the Works Number 1 area is not just the panel area the panel rea is much less and that the Applicant would come back in more detail on the comparison to other schemes. Mr Bamber noted the general pattern is visible from the table and that the Applicant could provide details on other schemes to enable an alternative like-for-like assessment based on the smaller solar panel area. Ms Brodrick noted they could comment on IGP's own schemes but there are differences between schemes and noted to provide a narrative explaining why any differences may exist.
2.3 Construction Traffic - Light Vehicle and Shuttle Bus Forecasting	Not discussed, proposed to be discussed in September hearings.
2.4 Highway User Safety	The ExA noted that Wiltshire Council and Stop Lime Down and many others have raised safety and operational concerns about the ability of two HGVs to pass along narrow rural roads

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	proposed for access to the solar PV sites Alderton Road, Fosse Way, the road east of Hullavington and Bradfield Cottages, the road between Fosse Way and Sherston, and several others along the cable route corridor. ExA asked the council's highway officers what visibility distances are usually required on single lane rural roads or narrow two lane roads before a passing bay needs to be installed? David Lear on behalf of Wiltshire Council noted that it depends on the nature of the road but usually say around 100 to 150 metres is comfortable. Mr Lear noted Alderton Road is likely one that is most sinuous in respect of horizontal alignment and nothing was recommended for this on the first transport assessment. The ExA noted concerns for space and visibility particularly on Fosse Way and the potential for damage to verges with local residents reporting the road edges are crumbling now. Mr Lear proposed preventative rather than remedial measures. Mr Bamber proposed a straight road a distance of 200 metres has been used in the past but there needs to be a detailed assessment made in specific circumstances. The Applicant has identified opportunities to widen the carriageway but not any assessment that demonstrates that it sufficient to allow intervisibility for drivers to make a decision at the right time. Mr Darrall stated that the reason for the Applicant's passing distances being set at 168 metres was because that was the maximum intervisibility along that route, not that this is the visibility requirement for two passing bays. The Applicant has done a vertical alignment which uses topographical survey submitted at deadline 3 but noted at deadline 4 the Applicant will be

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	providing further information and more detailed plans showing sections of road at 5.5 metres which should be wide enough for 2 HGVs to pass. Mr Lear for Wiltshire Council noted that 5.5 metres is the absolute minimum and even accepting it is a low frequency occurrence there is still a risk so would propose 6 metres. ExA questioned the Applicant's assessment on NMUs that because they are low, safety implications for users would be insignificant. ExA also noted that the Applicant dismissed the validity of Stop Lime Down's survey data but had not received any comprehensive survey data from the Applicant. Agreed not to be a steady stream of NMUs (Cyclists, equestrians, walkers and runners) still encountered on every route. <i>Post Hearing Note:</i> <i>Given the need to undertake the NMU survey again, the Applicant will submit the raw data at Deadline 5 when the NMU surveys have been undertaken.</i> The ExA queried any particular areas of concern for NMUs. ExA, Stop Lime Down and Wiltshire Council expressed particular concern about the Fosse Way, noting representations from cycle clubs regarding the road to Sherston, equestrians on the Fosse Way with stables on the road to Sherston, and the Bradfield Cottages section used by road walkers; flagged the section between Lime Down D, the lane estate of Hullavington, and Bradfield Cottages as used by cyclists, though less commonly.

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	Wiltshire Council raised concern about the section at Laverton, including a walk up to the Flying Monk café, noting a corner point with high banks rather than verges where two HGVs cannot pass. Mr Bamber also raised concerns about Rodbourne noting narrow lanes and public rights of way that would be heavily impacted by construction vehicles and proposing that one of the access points on the lane should be moved. Mr Bamber noted this is a particularly sensitive area with very few existing vehicles, such that the change in environment would be significant. The ExA sought to confirm that a HGV is 2.5 metres wide. Mr Darrall confirmed so and that if a pedestrian takes up 0.5 metre highway, then 2 metre separation is required for that pedestrian, the minimum road width required would be 5 metres. On Stop Lime Down's road width analysis, Mr Bamber noted that roads are 2.5 metres wide in places, that a 2-metre separation is required and a 0.5-metre margin for pedestrians. The suggestion that HGV drivers would stop for pedestrians is unrealistic. Where road width is 5 metres or less, HGVs are not providing enough space or are overrunning the verge. The minimum width of 5 metres is required for pedestrians and 5.5 metres for cyclists, but this does not account for verge buffer. In response to ExQ the Applicant states these road widths are available at various points on construction routes but this implies these standards are not met at various points. The ExA directed the Applicant for deadline 4 to identify areas where the road is not 5.5 metres wide on the plans, using a red box around those areas.

	<i>Post Hearing Note:</i> <i>The Applicant has provided the following:</i> • <i>Additional plans in Annex I of ES Volume 3 Appendix 13-1: Transport Assessment [EN010168/APP/6.3] (Revision 4) (Drawing PL109B) which shows the width of construction routes.</i> • <i>Appendix E in the Outline Construction Traffic Management Plan [EN010168/APP/7.22] (Revision 4) which includes proposed Highway Improvement Area Drawings for road widening and AIL movements.</i> In response to Stop Lime Down's claims Mr Darrall confirmed a further survey had been undertaken in May 2026 during the bank holiday period, with cameras on Allerton Road, Fosse Way, Hullavington, Bradfield, and Rodbourne, supplementing the initial survey in January 2024. However, the Fosse Way and Bradfield cameras were broken and stolen so this data was limited. Mr Darrall flagged there are currently Network Rail embankment works on the Fosse Way which are lasting 6 months. The survey on Alderton Road picked up 19 HGVs tipper lorries in one hour. Survey results for other areas included: Fosse Way — 10 pedestrians and 26 cyclists on the Bank Holiday Monday with no equestrians recorded during proposed delivery hours; Tuesday to Friday showed an average of 3 pedestrians and 8 cyclists per day. Lammington – 14 pedestrians, cyclists and no equestrians. Rodbourne — 41 total, 2 cyclists, and 8 equestrians during the whole week; and `Tuesday to Friday 13 pedestrians, 1 cyclist, and 8 equestrians from those locations. The ExA noted that only two surveys have been conducted between January 2024 and May 2026. Mr Darrall confirmed that one survey is normally typical, and that from scoping with Wiltshire Council for PRow surveys, it was considered but not required.
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	Mr Darrall noted that the Applicant's Deadline 4 submissions are very relevant and should be reviewed by Stop Lime Down. The ExA asked whether the Applicant disputes specific locations where Stop Lime Down say NMUs would be particularly vulnerable. Ms Brodrick confirmed that in the absence of confirmed data, it is difficult for the Applicant to specify particular locations. The Applicant acknowledged sections of road are narrower and has done further work in response to comments. The ExA cautioned that unhelpful comments about the reliability of data from another party, while asking the ExA to rely on the Applicant's own data, should not be repeated. <i>Post Hearing Note:</i> <i>Given the need to undertake the NMU survey again, the Applicant will provide a response to the Stop Lime Down NMU survey at Deadline 5 when the NMU surveys have been undertaken.</i> Mr Kozelko on behalf of Stop Lime Down noted that a yellow heat weather warning was in place during the May 2026 survey period and that the results may not be representative. Wiltshire Council had no further comments. Mr Bamber asked that if road widths are being collected, this should be done on-site rather than by survey or topographical survey basis, and if done by survey, the method should be caveated. Mr Darrall confirmed that topographical surveys conducted on site would pick up carriageway width, hedgerow, ditch, and verges in considerable detail. Mr Bamber noted that if all these details are picked up, the plans should reflect them. The ExA and parties agreed a conversation should take place outside the hearing regarding sharing raw topographical data with Mr Bamber.

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	The ExA noted the need to feel confident in the information provided on the plans, and that the plans do not currently show enough information. The ExA noted Stop Lime Down had produced a layered map in its written representations and asked whether the Applicant could produce something similar. Ms Brodrick confirmed the Applicant can produce layered plans and would take the point away to determine the possibility of providing full functionality, though this may not necessarily need to be done in the same form. Wiltshire Council noted difficulty in seeing features on swept path plans and welcomed any OS-based information, noting difficulty in understanding what features are present and what width amendments are proposed. Mr Bamber noted that chainage diagrams would be helpful to show an indication of width along each link. Ms Brodrick accepted this in principle, noting the documentation should be proportionate and should focus on the narrower sections where road width is a concern, and that further detail would be provided for those specific areas. The ExA confirmed the focus should be on narrower parts of routes where verge allowance for HGVs is particularly relevant. <i>Post Hearing Note:</i> <i>The Applicant will share the topographical data with Stop Lime Down and Wiltshire Council and submit into the Examination at Deadline 5.</i> Mr Bamber sought to confirm that further surveys are to be undertaken over the summer by the Applicant. Mr Darrall confirmed that as a result of camera theft they are redoing some of the surveys, revisiting original sites and repeating surveys. <i>Post Hearing Note:</i>

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	<i>The Applicant is currently in the process of redoing the NMU surveys and will respond to post hearing actions relating to NMU matters at Deadline 5.</i>
2.5 Highway Improvement Areas (HIAs)	The ExA asked whether the Applicant had identified any other areas requiring HIAs. Mr Darrall confirmed that passing points along the Fosse Way within the order limits are shown in plans submitted for Deadline 4, and that improvements are intended for the Fosse Way. The ExA asked Wiltshire Council whether any other HIAs need to be added. Wiltshire Council commented particularly on the southern part of the Fosse Way. The Council noted it had not seen Revision 3 of the transport assessment but at Revision 2, the HGV passing survey had not covered the northern part of the Fosse Way. The Council described the available width of the 90-degree junction towards Sherston, and the stretch of road between the junction at Hullavington to Bradfield Cottages, noting difficult sections and some opportunities for improvements. The Council noted 130–140 metre visibility at the Brookside junction beyond the railway bridge with no opportunity for HGVs approaching from the south due to the road curve and overhanging vegetation. A large concrete apron at a junction which goes to a farm at the back of the Flying Monk offered potential for improvement. The area near the café towards Lime Down D access point offers limited opportunity, with lorries liable to overrun the verge easily. The Council concluded that risk can be reduced by traffic management plan but not fully mitigated, and that passing bays are required. There remains uncertainty over what the Applicant is proposing and where holding areas are to be placed. The ExA noted that HIAs are not always desirable if not necessary or beneficial from a landscape perspective. Mr Bamber on behalf of Stop Lime Down noted that improvements on Alderton Road are not currently sufficient and agreed on the Fosse Way. Mr Bamber noted that the section of

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	road to Lime Down A has limited passing opportunities after the left turn from the Fosse Way, near Ladyswood stud. On Hullavington and Bradfield Cottages, Mr Bamber noted the issue is not just the potential underestimates but also that the largest components for Lime Down D have not been taken into account; the narrowness of the lane makes it difficult to manage existing highway conditions with the level of traffic, noting that it is temporary but that existing larger vehicles use it without the Applicant having control over them. The ExA directed an action to the Council to mark up a plan identifying those areas, so it is clear which areas have been addressed. he ExA noted that Lime Down D involves the 400kV substation and BESS, which will generate more traffic in that area. The ExA raised observations from its site inspection including: Alderton Road — temporary highway improvement for construction — and what happens during the operation and maintenance phase; whether the improvement is temporary for the period of construction only or for the life of the development. Ms Brodrick confirmed the HIA is temporary during construction and would be reinstated thereafter, with works put back in again for any replacement activity or decommissioning if required. Ms Brodrick clarified that the works relate to the verges rather than the vegetation, with the verge to be replaced. Ms Brodrick noted that Wiltshire Council could, under its own powers, retain the improvement for other purposes if useful, but the Applicant has only sought consent on a temporary basis. <i>Post Hearing Note:</i> The temporality of works within the Alderton Road Highway Improvement Aera is referred to in Table 7 in the Outline CTMP [EN010168/APP/7.22] (Revision 4) submitted at Deadline 4.

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	The ExA noted an observation regarding a stretch of the Fosse Way in proximity to accesses 3 and 204, where tipper lorries were observed driving in the centre of the road at speed, with verges pitted or sunken and passing bays full of holes. Mr Darrall confirmed this area is within the order limits and that widening is being looked at for the Deadline 4 submission. The ExA raised a query about the stretch from Ladyswood Stud to access 5, noting good visibility but querying whether the road was suitable for two HGVs to pass given the risk of oversailing or damaging verges, and given that the access is a permanent HIA. Mr Darrall confirmed the width is wide enough for two HGVs without oversailing the verges. On access 202, the ExA noted a busy section of road with a sharp and short hill with limited visibility, observing some opportunity for improvement. Mr Darrall confirmed Access 202 is an operational only access for habitat only and did not think it as on the construction route but noted they would look at this area. The ExA noted this as an observation for the Applicant to consider, in particular in respect of diversion of traffic coming off the construction route and the potential impact of any such diversion. The ExA noted that the stretch from Norton to Hullavington along Bradfield Cottages is a busy stretch of road and noted the possibility of some widening improvements. On HIAs at Rodbourne, E1 to E7, south side, the ExA stated that more information is necessary at Deadline 4, particularly in respect of what is happening over the railway line and the southern half of the site, which represents a sensitive part of the route. Mr Darrall confirmed that a compound is proposed around access 12, with trips delivered to the compound and a tractor and trailer used to cross the bridge. The ExA queried whether a

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	permanent HIA is required if a tractor and trailer is being used, and whether the Applicant could instead use an internal access track at the top of E4 to E1, rather than requiring a permanent improvement. Mr Darrall explained that vehicles coming from access 18 run into E1 and E2, crossing the road to get to E6 where the substation is, crossing from one field to another, and also crossing an existing right of way. Mr Bamber noted that the road to Sherston, past the stud, measures approximately 5.5 metres wide at the access outside the site, and cautioned against assuming that area is wide enough throughout. Ms Brodrick confirmed the extent of the potential permanent HIA reflects the need to microsite where operational access might be. Ms Brodrick sought to provide a post-hearing note giving greater clarity on what is proposed in Rodbourne area, noting that the relevant work number includes many different types of works. Ms Brodrick confirmed a plan showing temporary and permanent HIAs has been provided, with this section shown as permanent, and undertook to provide greater clarity, noting the permanent works may be of small extent. <i>Post Hearing Note:</i> <i>Further information regarding HIAs in Rodbourne is set out in Table 2 and Table 7 in the Outline CTMP [EN010168/APP/7.22] (Revision 4) submitted at Deadline 4.</i>
2.6 Construction Traffic Management Plan	To be discussed in writing or at later hearings.

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2.7 Any other Traffic and Transport Matters	To be discussed in writing or at later hearings.
3. Ecology and Biodiversity	
3.1 Survey Work	The ExA invited the Applicant to explain and justify their approach ecology and biodiversity within the cable route corridor, and at what point did the survey work influence the order limits. He further asked the Applicant to justify why the UK Habitat Classification Survey and Modular River Physical Survey, without the benefit of species surveys was an appropriate approach. The ExA confirmed they have read the Applicant's response to FWQ EB1.2. Peter Timms on behalf of the Applicant explained that the Cable Route Corridor Order Limits were refined from the wider Cable Route Search Corridor identified in the Preliminary Environmental Information Report following ecological surveys and environmental assessment work. The original search corridor had already been informed by consideration of statutory nature conservation designations, such as SSSIs, and ancient woodland, supported by a desk-based assessment. Following refinement of the corridor, habitat surveys were undertaken from March 2024 onwards. These surveys informed both the identification of habitats and features sensitive to the siting of temporary construction compounds. Mr Timms noted that temporary construction compounds were assessed as having a greater potential impact than the cable route itself due to their larger land take and the nature of the construction works. Consequently, compounds were located, where possible, within habitats of relatively low ecological value for biodiversity, such as arable fields and species-poor agricultural grassland, with site visits used to confirm the suitability of potential locations. The surveys also identified sensitive watercourses suitable for migratory fish, which were designated as avoidance areas. These areas, shown on ES Volume 2 Figure 3-2 Key Construction Phase Features

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	[REP3-036], will be crossed using trenchless installation techniques, including horizontal directional drilling (HDD), to avoid impacts during construction. Ms Brodrick confirmed that several disciplines were considered in the narrowing of the wider search corridor. There were a range of surveys carried out, as well as further deskwork. Then further surveys were carried out of the refined corridor to inform whether the area identified was suitable as well as assessed for having sufficient room for micro-siting. If the area was found not to be suitable, the area would have shifted. She confirmed that it was iterative process and other disciplines were taken into account. She also confirmed surveys were not carried out outside of the redline boundary. Mr Timms explained that specific species surveys in the Cable Route Search Corridor were not necessary due to the nature of works, the short-term impacts and the and long linear scheme in a small footprint of works. habitat survey data can be used to assess the likely suitability of habitats for affected species by considering factors such as species home ranges and population densities. This allows a proportionate mitigation strategy to be developed, often enabling impacts to be avoided or reduced to minimal levels without the need for extensive species-specific surveys. The approach was contrasted with that typically adopted for solar PV developments, where there is a change in land-use and longer-term impacts which may justify more detailed survey work. The ExA then asked the Applicant to explain the long-term indirect impacts such as light and noise on the area, due to concurrent works taking place.

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	Mr Timms explained that they have acknowledge some impacts may persist beyond the period of direct construction works but explained that the assessment was based on the cable route corridor construction programme, which is expected to last approximately 18 months. The ExA asked the Applicant to answer without species surveys and without knowing how the cable route will be delivered, how can the level of importance be determined on species, in consideration from the responses from Natural England in [REP3-112] and concerns from Wiltshire Council and Stop Lime Down. Mr Timms explained that the assessment of importance on species was informed by extensive survey data from the solar PV sites, where approximately 90% of the habitat comprised arable land and where hedgerows were of a similar structure and species composition to those within the cable route corridor. He stated that the importance of habitats and species can also be determined using established knowledge of species' habitat preferences, regardless of the specific location. While acknowledging that more detailed species-specific surveys could provide additional certainty, he maintained that the surveys undertaken were proportionate to the nature and scale of the likely impacts. Ms Brodrick explained that the Applicant considered it had sufficient information to determine the suitability of the Cable Route Corridor but also to inform the nature and suitability of mitigation measures that may be required, including relating to European Protected Species. She explained that should the future more detailed surveys to be undertaken pre-construction, which is common practice in Nationally Significant Infrastructure Projects ("NSIPs") could identify particular locations and that there would be space to microsite, but the Applicant maintains that those detailed surveys were not necessary at this stage. The ExA then asked the Applicant to comment on the assumptions made.

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	Mr Timms explained that the Applicant assumed presence for species in suitable habitats, as the surveys can miss information as they often assume presence absence. It's possible to miss species in a linear scheme e.g. in certain section of a watercourse, you wouldn't rely on absence data because you haven't surveyed a longer section of the watercourse. He confirmed there is a possibility that the Applicant is overstating presence. Ms Chalaby stated that the Applicant has not resolved Wiltshire Council's concern. Wiltshire Council maintains that it is not possible to give an appropriate level of importance without carrying out the detailed surveys. She further stated that further surveys should not wait until post consent, particularly as there are issues of European Protected Species ("EPS") and noted that there is case law on the issue, which she will submit at Deadline 4. Ms Fisher then highlighted a further concern regarding assuming presence as it's not clear what this means, and has it been carried out on a worst-case basis. She stated that the relevant guidance requires suitably informed application and challenged whether the Applicant can demonstrate it has adhered to the mitigation hierarchy following their process. Ms Brodrick confirmed she would submit case law at Deadline 5 relating to the when is the appropriate point to carry out detailed surveys on EPS. She further confirmed that pre-construction surveys are common practice and that the findings of those assessments are checked to be valid prior to the discharge of any plan or condition. The ExA then asked for further explanation on the assumed presence point. Mr Timms explained that the Applicant has taken a proportionate approach. Where there are likely to be greater impacts, extensive surveys have been carried out. Elsewhere, assumed presence has been identified as appropriate as the potential impacts are to be avoided or minimised with standard mitigation measures, as is typical with Solar DCOs.

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	Ms Fisher of Wiltshire Council queried why more detailed surveys were not carried out as by waiting for the detailed design, there is a risk that measures may have to be adapted, if for example, a species is found that was not expected, as it may not be possible to provide appropriate solutions at that stage. She further stated that the Environmental Statement ("ES") should account for the possible eventualities and the accuracy and robustness of the assessment is undermined if it is not informed by data. Celia Reynolds, representing Stop Lime Down echoed the concerns. Nicholas Valori stated that the Applicant has not considered in its approach, whether there are highway hedgerows in the Cable Route Corridor, which leads to a risk of underestimating presence of species. Mr Timms responded to say that the Applicant has considered commuting hedgerows and have implemented a mitigation approach to narrow working areas at hedgerows. Ms Brodrick clarified that the process has been to narrow down a 50m corridor to a 1.7m trench. The standard working trench width would be 25m and would narrow depending on the features it encounters, and the trench itself will always be 1.7m unless doing an open cut technique. Ms Brodrick confirmed that standard mitigation measures are in place, and further survey work will inform other mitigation measures. Where certain features have already been identified, mitigation measures are in place. The ExA then quoted from the Applicant's response on page 217 of the Applicant's Response to the Examining Authority's First Written Questions [REP3-128]. He asked the Applicant to clarify its approach to the mitigation hierarchy and the avoidance plans. Mr Timms reiterated that the Applicant identified where impacts are likely and areas where species are particularly sensitive to cable installation which is informed by habitat survey work and assumption of presence. Avoidance techniques include trenchless technologies and narrowing the width of the trench from 25m to 12m near hedgerows with sensitive species and 10m in impact zones for bats

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	which results in the works being unlikely to cause a significant effect on the species such as dormice. Avoiding completely would be disproportionate to the likely impacts. Mitigation measures relating to hedgerows are contained in the Outline Ecological Protection and Mitigation Strategy [REP3-103]. Ms Fisher, Wiltshire Council, stated that their concern with the approach relates to obtaining appropriate licenses in the event that work has already started. She confirmed that Wiltshire Council would review the responses by Natural England and respond by Deadline 4. Ms Brodrick confirmed that it has never been the Applicant's intention to carry out works without the appropriate licenses and the DCO process does not remove the obligation on the Applicant to obtain a license. The Outline Ecological Protection and Mitigation Strategy [REP3-103] details the process on when a license is required stating that delays would be required to obtain the license, with the onus on the Applicant to minimise the risk of delays. Mr Valori, Stop Lime Down, added that without wider picture, decisions being made are not based on detailed data and the Ecological Clerk of Works ("ECoW") would be overburdened at the construction stage making decisions on the ground. He stated that the value of the avoidance phase is decreased and the decision is made based on how to cause the least amount of harm. Mr Valori confirmed he could expand on his submission in writing by Deadline 4. In terms of timing, Ms Brodrick explained that detailed design work to understand the route and the change from the outline plans to submit for approval which are approved before construction starts. She made the distinction between pre-construction and work done during construction. The Applicant does not consider that the ECoW would be under pressure as described by Mr Valori as by that time, further design work and surveys would have been carried out with detailed information available. She also confirmed that there is a complex construction program to allocate teams from the necessary disciplines.

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	The ExA asked the Applicant to clarify why trenchless techniques for the whole are proportionate. Ms Brodrick explained that it would be prohibitively expensive and so is only used in particular areas where sensitivity has been identified as high. There are also other effects associated with HDD rather than open trench. She confirmed that the approach is never to employ HDD for entire sections, even if the solar sites were closer in proximity to the substation, and open trench is the standard accepted methodology. Ms Chalaby stated Wiltshire Council's concern that if a license is subsequently required, it follows that the Applicant had not anticipated that particular species. This means that the ExA has not considered these factors in its examination and this information cannot be properly considered into the overall planning balance. The ExA highlighted the concern around the lack of survey work carried out 500m outside the Order Limit relating to the data in Chapter 9 of the ES, paragraph 9.5.4 and has been carried out as a desktop assessment only. He asked the Applicant to clarify how the indirect impacts are known without the benefit of site-specific data and what is moving through the Order Limit. Mr Timms confirmed the Applicant has carried out a desk study based on the narrower linear nature of the Cable Route Corridor, including its immediate surroundings. From the habitats assessment and a variety of well publicised sources, they consider they have enough information to determine an estimate of the distribution of species which may be impacted. The Applicant considers the mitigation approach and measures chosen would reduce impacts at the site and surrounding landscape.

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	Mr Valori commented that the approach limits flexibility if for example it needs to account for higher degree of visibility splays. He added that this is a further layer for the ECoW to consider. Ms Brodrick confirmed that the Applicant would clarify the survey work done within the corridor itself, then the desk-based study area and the solar PV sites. She confirmed the Applicant is confident that the approach it has taken is conservative, provides sufficient information to inform the mitigation proposed, and that the conclusions are robust, taking into account the relevant guidance and how professional judgement has been applied. She confirmed Natural England has agreed with the approach. The ExA referred to paragraph 3.5.2 of the Statement of Common Ground with Wiltshire Council [REP2-025], considering Planning Inspector's Advice Note 9 paragraphs 4.12 and 4.13. Wiltshire Council expressed their concern that the worst-case scenario cannot be applied with accuracy and the proposal is therefore inconsistent with the Rochdale envelope. The ExA then sought clarity from Wiltshire Council on Table 9.2 of ES Volume 1 Chapter 9 Ecology and Biodiversity [REP1-015] which appears to contradict earlier submissions. Wiltshire Council confirm it was an earlier colleague who worked on this section and this is no longer Wiltshire Council's view. Mr Timms confirmed that the reference referred to in Chapter 9 relates to the solar PV sites rather than the Cable Route Corridor.
3.2 Approach to Habitats	<i>Hedgerows</i> The ExA queried whether hedgerow removal could be determined by the ecological value. Ms Brodrick explained that the process on whether or not to adopt trenchless techniques is also influenced by practically getting the construction team to either side of the crossing point along the Cable Route Corridor. This may lead to more hedgerows being removed so the construction team would have access. She also confirmed that certain hedgerows would be avoided due to using HDD to avoid a road, for example.

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	Will Threlfall for the Applicant then explained trenchless techniques. Mr Threlfall explained that if the Applicant were to use the whole road, 9 to 12 months excavation would be required, then ducting, returning the topsoil to provide a continuous duct. The contractor would return to do cable pulling, and joint base, which would then be excavated and filled. HDD could be seasonal as it is a separate activity to open cut trenching. If the haul road was not in place, there may be an existing access to use, but the contractor would not be able to get a cable drum into the field, resulting in potentially moving one hedgerow breach to another. The Applicant has tried to limit the number of hedgerows needing to be removed overall in how it has considered access. Mr Timms explained that some hedgerows have been avoided particularly for ecological reasons such as water courses suitable for migratory fish. Other instances include wooded railway embankments which are of a higher value than most other habitats in the Cable Route Corridor. He confirmed there are a variety of factors as to way a particular hedgerow is avoided. The ExA requested further information on the practicalities of Mr Threlfall's explanation and the ecological reasons, and the efforts made to maintain hedgerows as Habitat of Principal Importance, to understand the approach taken. <i>Post Hearing Note:</i> <i>With reference to the hedgerows identified within the TPO and Hedgerow Plan [APP-011], the hedgerows listed below will not be directly impacted by the Scheme, having been identified as being located within ecologically sensitive areas. In all cases, these hedgerows lie within the Avoidance Areas shown in ES Volume 2, Figure 3-2 Key Construction Phase Features [REP3-036].</i> <i>It should be noted that, in no case, has a hedgerow been avoided solely due to its intrinsic ecological value. Rather, these hedgerows have been avoided because of their association with other ecologically sensitive features. The Applicant acknowledges that, with respect to</i>

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	<i>hedgerows generally, the Scheme has been designed to minimise impacts on hedgerows requiring permanent or temporary removal. This has been achieved by committing to maximum extents of hedgerow removal, secured through the Outline Ecological Protection and Mitigation Strategy (EPMS) [REP3-102], thereby ensuring that no more hedgerow is affected than is reasonably practicable to facilitate construction of the Scheme</i> <table> <tr> <th>Hedgerow Label (Refer to [CR1-016])</th><th>Reason for avoidance</th></tr> <tr> <td>CRH57</td><td><i>The hedgerow is close to a wooded riparian corridor associated with a watercourse known as Byde Mill Brook. The watercourse was considered to be suitable for migratory fish as well as riparian mammals.</i></td></tr> <tr> <td>CRH59</td><td><i>The hedgerow is close to a wooded riparian corridor associated with a watercourse known as Byde Mill Brook. The watercourse was considered to be suitable for migratory fish as well as riparian mammals.</i></td></tr> <tr> <td>CRH111</td><td><i>The hedgerow comprises a riparian tree line associated with a watercourse known as Pudding Brook, which was considered to be suitable for migratory fish as well as riparian mammals.</i></td></tr> <tr> <td>CRH113</td><td><i>The hedgerow is associated with a small watercourse, at tributary of stream known as Pudding Brook. The watercourse which was considered to be suitable for migratory fish as well as riparian mammals.</i></td></tr> </table>	Hedgerow Label (Refer to [CR1-016])	Reason for avoidance	CRH57	<i>The hedgerow is close to a wooded riparian corridor associated with a watercourse known as Byde Mill Brook. The watercourse was considered to be suitable for migratory fish as well as riparian mammals.</i>	CRH59	<i>The hedgerow is close to a wooded riparian corridor associated with a watercourse known as Byde Mill Brook. The watercourse was considered to be suitable for migratory fish as well as riparian mammals.</i>	CRH111	<i>The hedgerow comprises a riparian tree line associated with a watercourse known as Pudding Brook, which was considered to be suitable for migratory fish as well as riparian mammals.</i>	CRH113	<i>The hedgerow is associated with a small watercourse, at tributary of stream known as Pudding Brook. The watercourse which was considered to be suitable for migratory fish as well as riparian mammals.</i>
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	CRH173	<i>The hedgerow is associated with a wooded motorway embankment</i>
	CRH206_A	<i>The hedgerow lies adjacent to a wooded railway corridor</i>
	The ExA queried in reference to the concern raised by Wiltshire Council at [REP1-138] whether the flexibility afforded to the Applicant for hedgerow removal in Schedule 12 article 40 of the draft DCO [REP3-005] is satisfactory, taking into account the schedule of changes submitted by the Applicant in the Schedule of Changes to the Draft Development Consent Order [REP3-127]. Ms Fisher, Wiltshire Council, confirmed the wording remains a concern due to the overly wide scope of powers conferred in the current wording and there is a lack of consistency between the Habitats Regulation Assessment, Hedgerow Removal Plans and the EPMS. Ms Brodrick confirmed that this is a point in the SOCG. The Applicant's position is that it is secured in the draft DCO as the power refers specifically to the management plan and the footnote refers back to the management plan. There isn't a need to duplicate in the DCO the same commitment. She confirmed that the maximum widths of the hedgerow removals are secured in the Outline Ecological Protection and Mitigation Strategy [REP3-102], the final version of which needs to be approved by Wiltshire Council, and therefore it is not necessary to include these figures in the DCO. The DCO refers to the strategy and states that the Applicant has the ability to put that maximum width within a particular length of hedgerow. Ms Fisher confirmed that Wiltshire Council would review the Schedule of changes submitted by the Applicant by Deadline 4. Ms Reynolds of Stop Lime Down requested clarification on the decisions to remove hedgerow based on hedgerow quality and ecological value, particularly considering the implications on Biodiversity Net Gain (BNG).	

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	Mr Timms confirmed that as part of the BNG strategy, the Applicant has identified the value of particular hedgerows, but the final decision will be based on ecological constraints or the type of hedgerow, removing as a narrow width of hedgerow as practicable. Ms Brodrick confirmed there are many factors to take into consideration in micrositeing, including but not limited to, ecological factors. <i>Post Hearing Note:</i> The <i>Outline Ecological Protection and Mitigation Strategy (EPMS) [REP3-102]</i> sets out the maximum lengths of sections of hedgerow permitted to be removed for different elements of the Scheme. This includes a maximum of 10 m permitted for new internal access (paragraph 6.2.3), maximum 18 m for access from/to the existing highway network (paragraph 6.2.4), and maximum of 12 m for cable installation works (paragraph 3.4.3). Kate Tate of Wiltshire Council raised a concern over the removal of high-quality trees. Ms Brodrick clarified that in regard to ancient and veteran trees, the Applicant has identified 9 trees within the Cable Route Corridor which will be retained. In relation to non-ancient and veteran trees there is an approach to minimise the impacts and microsite around them but in the event it's not possible they would be removed. She explained there are 201 trees within the Cable Route Corridor that have been identified within the 50m area. In some cases, the cable route corridor is wider than 50m because it allows for greater flexibility. There are 69 groups of trees and 132 individual trees within the Cable Route Corridor Order Limits, but not all will be affected as the working area is narrower. The final plans will identify the sections of hedgerows to be removed, and the Applicant must demonstrate its plans comply with the parameters set by Wiltshire Council, also considering consultations with other stakeholders such as Natural England. Mr Jackson reiterated that the Arboricultural Impact Assessment has assumed worst-

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	case as the cable route has not been micrositied at that point, meaning not all trees identified will be removed. The ExA queried whether there is sufficient control of tree removal and hedgerow removal in the control plans, including the Outline Construction Environmental Management Plan [REP3-092] and the Operational Environmental Management Plan [REP3-094]. Ms Brodrick confirmed the Applicant's position that there is sufficient control. Ms Tate requested that an Arboricultural Clerk of Works be required and that the qualifications be of that clerk be published. Ms Brodrick confirmed that there is an Arboricultural Clerk of Works and that as part of Table 4, section 3.15 of the Outline Construction Environmental Management Plan [REP3-092] it requires a person of at least 5 years' relevant experience. She confirmed that the Applicant will confirm whether the provisions refer to the plans relevant to replacement activities. <i>Post Hearing Note:</i> The commitment to provide an Arboricultural Clerk of Works is also set out in Table 4 (page 21) of the Outline Operational Environmental Management Plan [REP3-094] where it states that <i>"All maintenance and replacement activities near veteran trees will be supervised by an Arboricultural Clerk of Works (ACoW) to ensure no machinery or materials enter the Veteran tree buffer zone. This may be achieved through implementation of ground protection and/or tree protection fencing around the veteran tree buffer zones during maintenance and replacement activities."</i> <i>Ancient Woodlands</i> The ExA asked when detail of the 15m buffer to the North Bincombe Wood would be received.

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	Mr Jackson explained that amendments would be made to the relevant plans. The Applicant is rerouting the access track to a location outside the 15m from the ancient woodland but still maintain the existing track so it can be used. Given the embedded buffers to the hedgerow, the access track would have to be moved to the north of the hedgerow to a point in the field boundary. Ms Brodrick stated that the further detail will be submitted by Deadline 5, if not earlier by Deadline 4. <i>Post Hearing Note:</i> <i>The Landscape and Ecology Mitigation Plan [EN010168/APP/6.2] (Revision 3 (Parts 1,2 and 4) and Revision 4 (Part 3)) has been updated to confirm that the 15m buffer of Bincombe Wood will be maintained. Furthermore Table 4 of the Outline Construction Environmental Management Plan [EN010168/APP/7.12] (Revision 5) has been updated to confirm that any upgrades to the existing track will follow a specialist 'no-dig' construction methodology and specification to avoid the need to excavate and potentially incur root damage. It is also stated that no heavy vehicles or machinery will be used along the track where it is adjacent to North Bincombe Wood.</i> Ms Tate confirmed Wiltshire Council would prefer a 15m to prevent encroachment on the ancient woodland. The detail needs to be seen. Ms Brodrick confirmed that the existing track will be used to carry out hedgerow maintenance, for example. The relevant management plan will control the type of activity.

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	The ExA asked for clarification on the 15m buffer zone relating to Surrendell Wood, outlined in Wiltshire Council's Local Impact Report [REP1-137]. Ms Brodrick confirmed that the track is an existing one and it is not considered that there would be any impact on continuing to use that track. This has been addressed in the Applicant's response to the Local Impact Report [REP1-137] at page 281. <i>Post Hearing Note: Please refer to the Applicant's response to Action Point 21 at Section 2 (List of Actions for the Applicant and Other Parties following Issue Specific Hearing 3) of this written summary.</i> The ExA then requested clarification relating to the damage of trees on the plan on page 982 [REP3-066] at Grittleton. Mr Darrall confirmed that the Applicant would provide more details on the passing points and passing areas. He confirmed only verge is being used for the widening, but confirmation will be included in Deadline 4 plans. Ms Reynolds raised concerns of the knock-on ecological consequences in the event that the roads are too narrow and how the Applicant intends to deal with further widening of the road. Mr Darrall confirmed that it's not confirmed that road widening would be taking place if they were found to be too narrow. Mr Darrall confirmed that the AIL vehicles selected have caps at each end to avoid one corner. The AIL overruns on the other side, however, metal plating will be set down for the AIL to run over. <i>Post Hearing Note:</i> <i>Please refer to the Applicant's response to Action Point 22 at Section 2 (List of Actions for the Applicant and Other Parties following Issue Specific Hearing 3) of this written summary.</i>

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	<i>Water courses</i> The ExA referred to the EA's submission [REP3-146] and asked if the EA still has concerns relating to fish species, water course crossings, ecological assessments, and aquatic invertebrates as described. Laura Edwards, EA, confirmed there are no now concerns. The ExA then asked for an update on the watercourse buffers. Mr Timms confirmed there would be a minimum of 8m from any sort of watercourse, ditch or stream. A 10m buffer would be applied where there is a large population of water voles and wider still (not explicitly a buffer) but in the Outline Ecological Protection Mitigation Strategy, where there is a risk of biosecurity, particularly the spreading of non-native invasive species (such as Himalayan balsam) and crayfish plague, and in washdown areas, there will be a minimum distance of 15m away to reduce impacts. Mr Timms explained that the rationale for the 8m buffer relates to the EA's Flood Risk Activity Permitting Threshold guidance and is justified from a hydrological standpoint Mr Timms confirmed that the ecological buffer would normally be 5m for ditches, identified as the Riparian Zone which is the width of the bankside habitat associated with the watercourse, and 10m for streams or rivers, according to BNG guidance. <i>Post Hearing Note:</i> <i>Please refer to the Applicant's response to Action Point 23 at Section 2 (List of Actions for the Applicant and Other Parties following Issue Specific Hearing 3) of this written summary.</i> Josephine Bujor-Humphries confirmed that the EA would prefer a buffer of 10m on all watercourses to maintain wildlife corridors, bank stabilisation, and reduce species disturbance. She confirmed that the EA would submit further information by Deadline 4 on why a 10m buffer to all watercourses is preferred.

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	The ExA queried whether spot checks undertaken on water courses within the Cable Route Corridor follow standard survey protocol as outlined by CIEEM and best practice guidelines. Mr Timms explained that habitats suitability assessments surveys have been done in the Cable Route and been carried out in compliance with relevant guidance for water voles. Spot checks were done as they were doing those surveys to look for obvious boroughs. He reiterated a detailed species survey has not been done and therefore that guidance has not been followed. Ms Bujor-Humphries queried whether the Applicant would later carry out detailed species surveys. Mr Timms then confirmed the Applicant would be carrying out detailed species surveys on the crossings for water voles and otters as set out in the Outline Ecological Protection Mitigation Strategy. He confirmed they would carry out a pre-construction inspection for water voles to identify burrows which may not follow the guidelines for a detailed species survey, but that it would determine the exact location of the siting of the cable routes and whether further surveys would be required to be confident burrows are being avoided. <i>Post Hearing Note:</i> <i>Please refer to the Applicant's response to Action Point 25 at Section 2 (List of Actions for the Applicant and Other Parties following Issue Specific Hearing 3) of this written summary.</i> Ms Bujor-Humphries stated that the EA is not satisfied that the Applicant would not carry out baseline surveys for riparian and aquatic species. She explained that the EA does not believe a pre-construction survey would provide sufficient information or have been done early enough to provide time to put mitigation strategies in place, for example an EPS license for otters. The EA would prefer that the Applicant carried out baseline surveys as well as pre-construction surveys.

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	Ms Brodrick stated that the Applicant will continue discussions with the EA on this point. The Applicant would ensure that their requirements align with the relevant management plans and would provide a further update on the position. <i>Post Hearing Note:</i> <i>The Statement of Common Ground with Environment Agency has been updated to reflect the latest position between the two parties. Several matters are now identified as agreed between the two parties, including assessment results relating to aquatic invertebrates/ macrophytes and associated habitats, ecological impacts from watercourse crossings, mitigation measures and the Outline Ecological Protection and Mitigation Strategy, and the Outline Landscape and Ecological Management Plan.</i>
3.3 Approach to Species	The ExA confirmed that the under Item 3.2 the approach to buildings, field margins and Item 3.3 <i>Approach to Specific Species</i> will be moved to written questions and potentially will be revisited in September.
3.4 Monitoring	The ExA asked the Applicant to explain the envisaged role of Wiltshire Council in monitoring and why the ECoW is the most appropriate approach. Mr Timms explained that the ECoW would be responsible for targeted surveys and inspections of particular features in the construction phase and would have to be present during certain activities such as localised habitat clearance or works affecting hedgerows. They are also responsible for inspecting and checking fencing for the protection of habitats or ecological features. Ms Brodrick explained that in method statement 16, section 17.3 of the Outline Ecological Protection Mitigation Strategy [REP3-102] requires production of quarterly report

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	which is to be sent to Wiltshire Council. Ms Brodrick queried whether it was the costs that are the concern of Wiltshire Council. Ms Chalaby confirmed that it is costs and resourcing that is the concern as funding would be required to go verify the information provided. She added the same concern applies to the monitoring of BNG. She suggested that funding could take the form of a section 106 agreement and confirmed that the exact figure is being calculated internally and would provide this as soon as practicable. Ms Brodrick confirmed that the Applicant would contribute to costs, however, there is an ongoing discussion as to how this would be carried out, either through a section 106 agreement or a planning performance agreement, with a meeting to take place in the week commencing 6 July 2026. She explained the advantage of a planning performance agreement considering that the figure has not been confirmed at this point, making a section 106 agreement difficult. Ms Chalaby stated that Wiltshire Council had only recently had confirmation from the Applicant that it was willing to cover to monitoring costs: <i>Post Hearing Note:</i> <i>The Applicant met with Wiltshire Council Officers on 24 February 2026 to discuss the draft Development Consent Order. Schedule 16 of the draft DCO was discussed including monitoring fees, specifically where these would be secured. It was explained to Wiltshire Council Officers that Schedule 16 only related to fees for discharge of requirement applications and that other fees could be covered in a number of different ways , for example in a separate Planning Performance Agreement (PPA) for that stage or a section 106 agreement.</i>

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	<i>The Applicant met with Wiltshire Council Officers on 8 July 2026 to discuss monitoring and fees recoverable for informal discussions prior to submission of discharge of requirement applications, fees for consideration and determination of discharge of requirement applications and fees to monitor compliance with management plans and mitigation. Various mechanisms for Wiltshire Council to recover costs were discussed, including a S106 agreement or Planning Performance Agreement, or a combination of both. The discussions were productive between the parties, and it is anticipated to that the mechanism for monitoring will be agreed by the close of Examination. A further update will be provided at Deadline 5.</i> The ExA noted to Wiltshire Council that it was aware of different options for securing monitoring costs but that a section 106 agreement would need to be agreed and submitted to the ExA before the end of the Examination. The ExA noted that a section 106 agreement would be directly enforceable against the DCO whereas a planning performance agreement would not. Ms Reynolds of Stop Lime Down stated that the Outline LEMP maps out the monitoring strategy and it includes monitoring bird populations in the PV sites, however, queries the Applicant's adaptive management plans. Mr Valori raised skylark mitigation as a central aspect of the proposed mitigation strategy. He emphasised that the Applicant is proposing to enhance the population of skylark as a mitigation strategy and therefore monitoring is required and questioned whether these plans are feasible. Mr Timms agreed that monitoring of the skylark mitigation areas is key, however, monitoring of skylark populations can be difficult to interpret as there are many varying factors such as rotational farming practices or weather conditions. He states that the habitat types proposed are in line with guidance proposed on suitable habitat for skylarks, particularly the open nature of the fields selected. He noted that the findings of monitoring would be used to identify whether there needs to be a change in management for vegetation structure in those fields. Ms Brodrick

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	confirmed the high level of detail relevant to the adaptive management required will go in the relevant final plan, however, a reference to that detail may be added to the outline plan and the Applicant will consider this approach. <i>Post Hearing Note:</i> Table 3 of the <i>Outline Operational Environmental Management Plan [EN010168/APP/7.13]</i> (Revision 5), submitted at Deadline 4, has been updated to address adaptive skylark mitigation.
3.5 Biodiversity Net Gain (BNG)	The ExA explained their concerns relate to the 11 observations in Wiltshire Council's Written Representation [REP1-138] paragraphs 6.39-6.82 in that the Applicant is committed to providing BNG as if it is mandatory. The ExA explained they needed to be confident in the methodology and confirmed observations 2-11 should appear in the SOCG. Ms Chalaby confirmed that Wiltshire Council is concerned about observations 2-11. <i>Post Hearing Note:</i> Observations 2-11 are set out in the Statement of Common Ground with Wiltshire Council [EN010168/EXAM/8.2] (Revision 2) being submitted at Deadline 4 (see matters 3.5.31 to 3.5.41).
3.6 Grazing	The ExA references the potential for sheep grazing and the discrepancies on whether sheep grazing is relied upon by the Applicant. Ms Brodrick explained that the Applicant is not relying on or committing to sheep grazing as part of the proposal, and rather the solar PV sites rely on mowing and cutting. She confirmed there is a potential for sheep grazing and this can be facilitated, however, the area is not being actively grazed by sheep at the moment. The ExA then required clarification on how sheep grazing aligns with the DCO and the other obligations.

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	Mr Timms confirmed that any grazing would need to be in accordance with the Outline Landscape and Ecological Management Plan. He stated that the Applicant provides options on grassland management which can be managed by cutting alone which is aligned with BNG management. For example, where grazing is used as a management tool, the grazing would be rotated to ensure wildflower flowering season it avoided to ensure that the habitats as set out in that document are delivered. The Applicant confirmed they would expand on how sheep grazing aligns with the ecological enhancement management plans and how it is compatible with other mitigation measures, as well as any impacts sheep grazing has on hydrology and any associated flood risks. This should also include a clarification on the areas in which sheep grazing would take place which is in between the panels. <i>Post Hearing Note: Please refer to the Applicant's response to Action Point 29 at Section 2 (List of Actions for the Applicant and Other Parties following Issue Specific Hearing 3) of this written summary.</i>
3.7 Any other Ecology and Biodiversity Matters	The ExA stated that Item 7 would be moved to written submissions. <i>Post Hearing Note: The Applicant will respond to any second written questions on this agenda item raised by the ExA.</i>
4. Review of the issues and actions arising	
5. Close of hearing	

2 List of Actions for the Applicant and Other Parties following Issue Specific Hearing 3

Number	Responsible party	Action	Submission deadline	Applicant's response / commentary
1.	Applicant	Confirm if alternative adverse indivisible load (AIL) Route 1 in the outline Construction Traffic Management Plan (oCTMP) (B4039 to M4 J18), is to remain an option and if so annotate this on the relevant plan.	Deadline 4	Addressed in the post hearing note at agenda item 2.1 of this written summary.
2.	Applicant	Confirm if dialogue between owners of Firs Farm at The Gibb has taken place, given the potential impact on their property.	Deadline 4	The Applicant has corresponded with Mr Wright of Firs Farm as follows: • June 2025 – The Applicant wrote to Mr Wright of Firs Farm, The Gibb, Chippenham regarding targeted consultation under Section 42 of the Planning Act 2008. • June 2025 – The Applicant wrote to Mr Wright with a project update letter. • 11 June 2025 – The Applicant wrote to Mr Wright with a Land Interest Questionnaire (LIQ). • 26 June 2025 – The Applicant wrote to Mr Wright with a reminder

Number	Responsible party	Action	Submission deadline	Applicant's response / commentary
				letter asking him to complete and return his LIQ. 28 October 2025 – The Applicant wrote to Mr Wright to notify him of the Planning Inspectorate's decision to accept the Development Consent Order Application under Section 56 of the Planning Act 2008. 7 July 2026 – To date, the Applicant has not had any correspondence with Mr Wright with regards to potential damage to his garden.
3.	Applicant	Plan [APP-150] to be corrected, as currently shows Lime Down A and C substation AIL route (Alternative) going through Yatton Keynell.	Deadline 4	Addressed in the post hearing note at agenda item 2.1 of this written summary.
4.	Applicant	Provide a plan to show AIL turning circle at Fowlswick Lane compound to demonstrate the Cable AIL Route 2 will not proceed northwards through Yatton Keynell. For all other AIL routes, if AIL vehicles are intended to follow their same routes in reverse after unloading, provide information to confirm those	Deadline 4	Addressed in the post hearing note at agenda item 2.1 of this written summary.

Number	Responsible party	Action	Submission deadline	Applicant's response / commentary
		vehicles can also turn around at their respective unloading sites without further undocumented highway works to facilitate those manoeuvres.		
5.	Applicant	Review and provide detail of notice periods for AIL for road closures and any subsequent Traffic Regulation Order notices which may also be required.	Deadline 4	Addressed in the post hearing note at agenda item 2.1 of this written summary.
6.	Stop Lime Down	Provide updated HGV figures as outlined at the hearing.	Deadline 4	N/A
7.	Applicant	Provide a set of plans showing which parts of the construction route(s) would fail to meet the highway code requirements for passing non motorised users (NMUs) with sufficient verge protection buffer, and/ or provide a log of the locations and the length of those locations that would not provide sufficient passing space for each of the NMUs (with verge protection buffer) in line with the highway code.	Deadline 4	Addressed in the post hearing note at agenda item 2.4 of this written summary.
8.	Applicant	Provide topographical survey data and plans (with chainage), which indicate road width and condition, to all parties at D4. Also consider whether a useable	Deadline 4 / 5	Addressed in the post hearing note at agenda item 2.4 of this written summary.

Number	Responsible party	Action	Submission deadline	Applicant's response / commentary
		layered PDF plan which will allow certain features to be switched on and off, can be provided (at D5).		
9.	Applicant	Repeat the May 2026 survey of NMUs during before D6 so that the information is submitted into the examination no later than D6.	Deadline 6	Addressed in the post hearing note at agenda item 2.4 of this written summary.
10.	Wiltshire Council	Mark up areas on a plan where you consider highway improvement areas may be required.	Deadline 4	N/A
11.	Applicant	Provide greater clarity on Rodbourne highway improvement area (HIA) and whether this is restricted to the widening of a small access point or more extensive, and why this is required as a permanent HIA.	Deadline 4	Addressed in the post hearing note at agenda item 2.5 of this written summary.
12.	Applicant	Provide a full response to the points raised by Wiltshire Council and Stop Lime Down and ensuring that the discussion on Table 2 of REP1-172 is not overlooked.	Deadline 4	As noted in the post hearing note at agenda item 2.2 of this written summary, the Applicant is still in the process of engaging with Wiltshire Council and Stop Lime Down on these matters and will provide a response at Deadline 5.

Number	Responsible party	Action	Submission deadline	Applicant's response / commentary
13.	Wiltshire Council	<u>Mitigation</u> Submit the referenced case law on European Protected Species (EPS) surveys.	Deadline 4	N/A
14.	Wiltshire Council	<u>Mitigation</u> To cover in their post-hearing submissions information regarding the application of the mitigation hierarchy.	Deadline 4	N/A
15.	Stop Lime Down	<u>Mitigation</u> Submit response to the Applicant's approach to, and application of, the mitigation hierarchy.	Deadline 4	N/A
16.	Applicant	<u>Habitat and Species Surveys</u> To provide information caveating the assessment (specifically the approach to survey work) and conditions of the environmental assessment and respond to Wiltshire Council information at D4 on caselaw and legal opinion on EPS.	Deadline 5	The Applicant will respond to this at Deadline 5 as requested.
17.	Applicant	<u>Hedgerows and Horizontal Directional Drilling</u> Submit a list of areas where open trenching techniques have been avoided and reasons for it in relation to	Deadline 4	Addressed in the post hearing note at agenda item 3.2 of this written summary.

Number	Responsible party	Action	Submission deadline	Applicant's response / commentary
		hedgerows and the practical considerations. The Applicant should detail the practical implications of the wider use of HDD and what this would mean for hedgerows across the site.		
18.	Wiltshire Council	<u>Hedgerows removal wording in the DCO</u> Review the changes proposed by the Applicant in Schedule 12 and DCO article 40(1) and provide comments.	Deadline 4	N/A
19.	Applicant	<u>Trees</u> Applicant to include commitment in the outline Operational Environmental Management Plan (oOEMP) to using an Arboricultural Clerk of Works during maintenance and replacement activities.	Deadline 4	Addressed in the post hearing note at agenda item 3.2 of this written summary.
20.	Applicant	<u>Ancient Woodland</u> Submit updated plans to show that arrangements have been made to maintain the 15m buffer at North Bincombe Woods and confirmation in a management document of the uses and machinery that might occur on the existing access track in that buffer area.	Deadline 4	Addressed in the post hearing note at agenda item 3.2 of this written summary.
21.	Applicant	<u>Ancient Woodland</u>	Deadline 4	The justification for the intrusion into the 15m buffer zone at Surrendell

Number	Responsible party	Action	Submission deadline	Applicant's response / commentary
		Submit justification of intrusion into 15m buffer zone at Surrendell Wood.		Wood relates to an existing gravel farm track that is located within the 15 m buffer along the eastern edge of Surrendell Wood. As set out in ES Volume 3, Appendix 10-1: Arboricultural Impact Assessment and Outline Arboricultural Method Statement [APP-206], the track has been subject to prolonged use by heavy agricultural machinery and the ground is therefore anticipated to be already compacted. This existing compaction, together with the localised changes in ground levels between the woodland edge, the track surface and the outer extent of the proposed temporary construction compound, is expected to have restrained the establishment of tree roots beneath the track. Consequently, the potential for construction activities associated with use of the existing track to adversely affect tree roots within the 15 m buffer is considered to be low.

Number	Responsible party	Action	Submission deadline	Applicant's response / commentary
				No tree felling, pruning or other direct works to woodland vegetation will be required to facilitate use of the track and, as such, no direct impacts on Surrendell Wood are anticipated. The use of the existing farm track avoids the need to construct a new temporary access route through previously undisturbed land, thereby minimising additional soil disturbance and enabling surrounding land to be reinstated to its baseline condition as soon as reasonably practicable following completion of the cable installation works.
22.	Applicant	<u>Grittleton junction</u> Plans to confirm area needed and no damage of root areas (only use of verges). Same for the rest of the highway improvement areas.	Deadline 4	The Applicant has provided the Grittleton AIL swept path in Annex H of ES Volume 3 Appendix 13-1: Transport Assessment [EN010168/APP/6.3] (Revision 4) (Drawing SP21A) which demonstrates that vehicle does not overrun the verge at Grittleton, and no trees will be impacted.

Number	Responsible party	Action	Submission deadline	Applicant's response / commentary
				In addition, Tables 13-10 and 13-11 of ES Volume 3 Appendix 13-1: Transport Assessment [EN010168/APP/6.3] (Revision 4) and Table 2 and 3 of the Outline Construction Traffic Management Plan [EN010168/EPP/7.22] (Revision 4) have been updated to summarise the works being undertaken at each access point. [NK26.1] For other Highway Improvement Areas where there is potential to impact trees, works will be undertaken under the instruction or supervision of the Arboricultural Clerk of Works. The requirement for an Arboricultural Clerk of Works is secured in the Outline Construction Environmental Management Plan [REP3-092] and the principles for working near trees are provided in ES volume 3, Appendix 10-1 Arboricultural Impact Assessment and Outline Arboricultural Method

Number	Responsible party	Action	Submission deadline	Applicant's response / commentary
				Statement [APP-206] and will be expanded upon in the detailed AMS.
23.	Applicant	<u>Watercourse buffers</u> Provide ecological rationale for using an 8m minimum buffer from watercourses (irrespective of a hydrological reason for the buffer), having regard to the Environment Agency's advice to provide a 10m buffer.	Deadline 4	In an ecological context, the Applicant considers a minimum 8 m protective buffer from the top of ditch banks to be appropriate to protect the ecological function of watercourses and their associated riparian habitats throughout all phases of the Scheme. The 'Riparian Zone' is described within the Statutory Biodiversity Metric User Guide (Defra, June 2026) as 'a set area from the bank top of the watercourse' and defines the Riparian Zone associated with ditches as extending 5 m from the top of each bank. The User Guide further states that 'The riparian zone supports features which influence the hydrological, geomorphological and biological functions or process within the channel. It also provides

Number	Responsible party	Action	Submission deadline	Applicant's response / commentary
				ecological function for riparian or aquatic species.' The proposed minimum 8 m buffer therefore fully encompasses the 5 m riparian zone identified within the User Guide and provides an additional margin of protection beyond this minimum extent. The retained buffer would maintain habitat connectivity, provide terrestrial refuge and dispersal habitat for aquatic and riparian species, support riparian vegetation, and allow natural geomorphological and ecological processes to continue. The appropriateness of an 8 m buffer is further supported by published guidance relating to protected riparian species. The Water Vole Mitigation Handbook (Mammal Society, 2016) states that

Number	Responsible party	Action	Submission deadline	Applicant's response / commentary
				a buffer of 3–5 m from the toe of the bank should be protected to avoid impacts on water vole burrows (paragraph 4.3.1, page 22). An 8 m buffer measured from the top of the bank would therefore exceed this minimum recommendation in the majority of circumstances. The Applicant understands the acceptability of an 8 m buffer from ditches was discussed and agreed with the Environment Agency during a meeting on 7 October 2024. The Applicant also notes that a minimum 8 m buffer to ditches has been accepted for other consented solar NSIP projects, including Cottam Solar (EN010133) and West Burton Solar (EN010132), for which the Environment Agency did not raise objection to the proposed buffer width.
24.	Environment Agency	<u>Watercourse buffers</u> Provide further detail and justification regarding why a 10m watercourse buffer	Deadline 4	N/A

Number	Responsible party	Action	Submission deadline	Applicant's response / commentary
		is necessary from an ecological perspective.		
25.	Applicant	<u>Water vole surveys</u> Applicant to liaise with the Environment Agency on survey discrepancy and provide an update.	Deadline 4	The approach to baseline surveys and watercourse crossings within the Cable Route Corridor was discussed between the Applicant and the Environment Agency during a meeting on 22 May 2025. During the meeting, the Applicant outlined its proposed approach of undertaking habitat suitability assessments for riparian and aquatic species and, on a precautionary basis, assuming the presence of such species within all suitable habitat. In doing so, the Applicant highlighted the temporary nature of the likely impacts, survey access limitations, and the significant period expected to elapse between pre-submission surveys, the granting of consent, and the commencement of construction. The Applicant also explained that this precautionary approach would likely be adopted regardless of the outcome of any pre-submission presence/absence surveys, given these limitations.

Number	Responsible party	Action	Submission deadline	Applicant's response / commentary
				The Environment Agency advised that this was not considered best practice and noted that, should pre-construction surveys identify protected species (for example, otter holts or water vole burrows), any subsequent protected species licence applications could delay construction. In response, the Applicant confirmed that updated surveys would be undertaken prior to construction (post-consent) and that survey methodologies, mitigation measures and licensing requirements would be addressed through the Outline Ecological Protection and Mitigation Strategy (EPMS) [REP3-102] to ensure adverse impacts were avoided. It is the Applicant's understanding that the Environment Agency has subsequently reviewed the measures set out within the Outline EPMS [REP3-102], including those relating to riparian and aquatic habitats,

Number	Responsible party	Action	Submission deadline	Applicant's response / commentary
				protected species and potential licensing requirements, and has not raised any further concerns regarding these measures. This is reflected in the Environment Agency's agreed position, as set out, for example, in the Environment Agency's Comments on Submissions Received at Deadlines 1 and 1A [REP2-049] .
26.	Applicant and Wiltshire Council	<u>Monitoring</u> Applicant to discuss with Wiltshire Council the mechanism to ensure resources for monitoring, including Biodiversity Net Gain, and submit an update.	Deadline 5	Addressed in the post hearing note at agenda item 3.4 of this written summary.
27.	Applicant	<u>Skylark monitoring</u> Submit more details regarding monitoring of skylark habitat and add a commitment to adaptive management plan in the outline Operational Environmental Management Plan.	Deadline 4	Addressed in the post hearing note at agenda item 3.4 of this written summary.
28.	Applicant	<u>BNG methodology</u> Add a response to Wiltshire Council observations 2 to 11 from their Written	Deadline 5	Addressed in the post hearing note at agenda item 3.5 of this written summary.

Number	Responsible party	Action	Submission deadline	Applicant's response / commentary
		Representation in the Statement of Common Ground.		
29.	Applicant	<u>Grazing</u> To provide further information regarding sheep grazing and its compatibility with the management plans and comment on the effect of sheep grazing on hydrology. Also clarify the areas where sheep grazing could occur with an explanation of how this is controlled through the draft Development Consent Order.	Deadline 4	Sheep grazing does not automatically increase flood risk. The relevant mechanism is poor grazing management. Compaction, poaching, bare ground, vegetation loss and repeated trampling in wet or sensitive locations can reduce infiltration, reduce soil storage, increase local runoff and mobilise sediment. Environment Agency Natural Flood Management evidence identifies reduced soil compaction, reduced stocking density, improved vegetation cover, sustainable stock management and timing of grazing as measures that can influence runoff. The evidence supports a field and hillslope scale link between soil condition and runoff, but it does not justify treating grazing as an inherent material downstream flood risk impact.

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				The Farming Rules for Water guidance takes the same practical approach. Land managers must consider slope, ground cover, proximity to water, soil condition and land drainage when assessing runoff risk. For livestock, the guidance requires prevention of trampling compaction or poaching within 5 m of inland freshwaters or coastal waters. The planning test is unchanged. The development must remain safe for its lifetime and must not increase flood risk elsewhere. The Flood Risk and Coastal Change PPG requires flood risk measures to avoid increasing flood risk elsewhere over the lifetime of the permission. For Lime Down, sheep grazing is not relied upon in the flood risk assessment. The assessed operational position is no grazing. The Outline Operational Environmental Management Plan [REP3-094] states that the reasonable worst case assumes vegetation will be managed by

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				machinery and there will be no grazing at the Solar PV Sites during operation, although sheep grazing may be explored post-consent. The Commitments Register [APP-291] records the same position. Vegetation management is based on machinery, with sheep grazing identified only as a potential opportunity beneath panels. The FRA and Drainage Strategy already controls the relevant risk. Effective soil management is required to maintain natural drainage and avoid increased surface water flood risk. Maintained groundcover vegetation is identified as important for overland filtering and infiltration. Disturbance and compaction are to be minimised. Managed low-intensity sheep grazing beneath panels would not normally be expected to materially increase flood risk, provided vegetation cover is maintained and grazing is controlled to avoid soil damage.

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				If grazing is introduced post-consent, it should be controlled through the detailed OEMP, LEMP and SRMP. Controls should address stocking density, wet-weather restrictions, watercourse and drainage buffers, trough and feeder locations, livestock congregation in flow routes, monitoring for compaction, poaching, waterlogging and vegetation loss, and remedial action where required.