



Lime Down

Solar Park

Written Summary of the Oral Submissions at the Open Floor Hearing 2 and the Applicant's Responses

July 2026

Revision 1

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1 Introduction

1.1 Purpose of this Document

- 1.1.1 This document provides the Applicant's response to oral submissions made to the Planning Inspectorate (PINS) at Open Floor Hearing 2 (OFH2), held on 30 June 2026. These hearings provided the opportunity for registered Interested Parties (IPs) and other local people to make oral representations about the application. Each IP making an oral submission was requested to provide a written summary note to the ExA for Deadline 4 (10 July 2026).
- 1.1.2 The following people and organisations were present and made submissions at the OFH2: Roz Savage MP, Daniel Kozelko, Toby Sturgis, Debbie Lawley, Magaly Etter, Christian de Coulon, Christine Hamilton, Kim Langley, Piers Dibben, Dermot Farrington, Caroline Moore, Gerald Joynson, Mike Hinwood, Geoffrey Philipps, Steve Harvey, Aileen Hood, John Matthews, Sarah Payne, Anna Layton, Helen Worthey, GDPR – LDSF – 025 and Craig Fuller.
- 1.1.3 This document provides the Applicant's response to the oral submissions made to the Planning Inspectorate (PINS) at the Open Floor Hearing (OFH2) held in connection with the Lime Down Solar Project. The Open Floor Hearing provided the opportunity for registered Interested Parties (IPs), statutory consultees and members of the local community to make oral representations on matters relevant to the application. Speakers were invited by the Examining Authority (ExA) to submit written summaries of their oral representations to the Examination by Deadline 4.
- 1.1.4 The individuals and organisations who spoke at the Open Floor Hearing include local residents, landowners, and community representatives. A full list of speakers and the capacity in which they spoke is recorded in the Open Floor Hearing transcript and the ExA's published event records.
- 1.1.5 This document sets out the Applicant's response to the matters raised during the Open Floor Hearing. The responses are grouped by speaker. Where multiple oral submissions raise the same or similar issues, a detailed response is provided at the first occurrence, with subsequent responses cross-referenced as appropriate. Where the Applicant has already made commitments or provided relevant mitigation, the applicable application or examination documents are identified.

2 Summary of Matters Raised in Oral Submissions at Open Floor Hearing 2 and the Applicant's Responses

2.1 Roz Savage MP

Reference	Comments/Issue raised	Applicant's Response
RS-001	██████████, a member of Parliament for the South Cotswolds, appeared as a registered interested party on behalf of the communities in the South Cotswolds Constituency. ██████████ was an environmental campaigner for 20 years before becoming a member of Parliament and campaigned extensively on the nature crisis and climate crisis. ██████████ understood the need to transition away from fossil fuels to renewable energy but feels strongly that the Lime Down project is not the right way to achieve the goal. ██████████ believes that it is the wrong size in the wrong place and in the wrong ownership. ██████████ believed that it is badly sited, inadequately assessed and will not serve the energy transition but rather alienate people from that purpose. ██████████ focused on three issues due to time constraints.	The Applicant notes Dr. Roz Savage's role as MP for the South Cotswolds Constituency and her work to date within the environmental sector. The Statement of Need [REP1-085] explains that an unprecedented capacity of new low-carbon schemes is urgently needed to support the Government's energy objectives for decarbonisation, security of supply and affordability. With this as a context, the Statement of Need explains that the Scheme has been proposed at a scale which will bring forward a significant contribution towards meeting the Government's objectives. The Statement of Need [REP1-085] explains that the location of the Scheme enables it to deliver against the urgency of need, in relation to decarbonisation, security of supply, and affordability and in further support for the proposed scale of the Scheme, explains why the Applicant seeks to maximise use of the connection capacity which is to be made available to it. The Environmental Statement (ES) [APP-052 to APP-265] provides a comprehensive and robust evaluation of the Scheme's effects on the physical, ecological, and socio-economic

Reference	Comments/Issue raised	Applicant's Response
		environment, undertaken by competent experts with extensive experience in Nationally Significant Infrastructure Projects. Regarding the site selection and the assessment of alternatives, the Applicant has carried out a comprehensive site selection assessment as set out in the Site Selection Assessment Report [APP-185] including a review of 9 alternative locations (potential development areas (PDAs)) for the Scheme against standardised assessment criteria such as potential effects on ecology, heritage, landscape and land use (including agricultural land) together with a high level review of other areas within the selected search area. In addition to the assessment set out in the Site Selection Assessment Report [APP-185], the Applicant has reconsidered how the identified PDAs could be grouped together, has extended the search area for alternative sites to 25 km and has reconsidered additional land around the previously identified PDAs to check whether the addition of such land would affect its conclusions on the suitability of PDAs (see Technical Note on Site Selection Assessment [REP2-043]). The conclusion of the Applicant's assessment is that there are no more suitable and available locations within the 25 km search area than the proposed location for the Scheme, based on the criteria identified. The Applicant considers its site selection assessment to be in line with the Overarching National Policy Statement for Energy (EN-1) (NPS EN-1) (including but not limited to paragraphs 4.3.22 – 4.3.29), the National Policy Statement for Renewable Energy Infrastructure (EN-3) (NPS EN-3) (including but not limited to paragraphs

Reference	Comments/Issue raised	Applicant's Response
		2.10.18 – 2.10.34) and the requirements of Regulation 2 and paragraph 2 of Schedule 4 to the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017.
RS-002	██████ noted that the proposed developed covers over 3,000 acres, with nearly 2,000 acres of solar PV rays which are sprawled and not contiguous along the site, which will result in the long-term industrialisation of a sensitive rural landscape. The proposed development is close to the Cotswold National Landscape, which adds to the cumulative impacts of development across Wiltshire. This is also incomplete with gaps, especially along the cable route corridor. ██████ noted that there are limited or absent surveys for bats, birds and protected species. The ExA cannot be sure that the impacts on biodiversity are being adequately addressed.	The Applicant maintains that the Scheme comprises a series of independent Sites set across an extensive agricultural landscape, with large areas of land between each of the Sites helping assist with assimilation. Each Site is set apart by their associated features such as robust hedgerows, woodland and tree cover, intervening settlements and changing topography. The discrete areas of land in the Scheme are placed so far apart that the Scheme would not be perceived in its entirety and the solar panels are distributed 'in and amongst' the landscape features to help assimilate them into the landscape. Due to the Scheme's location on the edge of the Cotswolds National Landscape (CNL) avoidance measures have been incorporated into the Scheme Design as part of the Mitigation Hierarchy as set out in Section 8.9 of the ES Volume 1, Chapter 8 Landscape and Visual [REP3-025]. This includes: • Avoiding development adjacent to the National Landscape where it would affect its setting; and • Avoiding development where it would be visually intrusive and affect the character and visual experience of the landscape.

Reference	Comments/Issue raised	Applicant's Response
		Areas within the setting of the CNL have been specifically targeted for positive enhancement to further the purposes of the CNL. The creation of wildflower meadows and margins as well as areas of scrub and new hedgerows as set out within the LEMPs are proposed in the northern part of A1, A11 and A12, B12, C1, C6, C8, C9 and the majority of C10. These features would be visible in Site C where hedgerows are to be managed at their current height of c1.5m. These measures are distinct enhancement measures which have been informed by consultation with the CNL Board (CNLB), the CNL Management Plan and Nature Recovery Strategy and are considered to be beneficial landscape improvements which further the purposes of the CNL designation. These measures have been included to prevent harm to the CNL and as identified above, to provide opportunities for positive enhancement within the setting of the CNL. This enhancement has been confirmed by the CNLB in their comments on any other submissions received at deadline 2 [REP3-154]. In reaching a decision on whether to grant the DCO, the Secretary of State will have to balance the benefits of the Scheme against the identified harms, noting that protection should be given to the landscape and natural beauty of the CNL, as outlined at Section 5.10 of NPS EN-1.

Reference	Comments/Issue raised	Applicant's Response
		In undertaking this balancing exercise, consideration must be given to the mitigation and enhancement measures proposed and the extent to which, once implemented, they would minimise the proposal's residual adverse impact upon the natural beauty of the CNL and its setting. NPS EN-1 also states that the Secretary of State should be satisfied that measures which seek to further the purposes of the designation are sufficient, appropriate and proportionate to the type and scale of the development. The 'seek to further' duty does not preclude decisions that are 'net harmful' to the natural beauty of a National Landscape. If that were so, the duty would be to 'further the purpose' rather than to '<u>seek</u> to further the purpose'. However, positive evidence is required to demonstrate that the relevant authority has, in all the circumstances, sought to further the purpose, not merely through mitigation of harm but by taking all reasonable steps to further the purpose. As set out within the CNLBs comments on any other submissions received at deadline 2 [REP3-154], the CNLB confirmed that the Applicant <u>has</u> sought to further the natural beauty of the CNL through the proposed enhancement measures located in the setting of the CNL, including some of those outlined at Table 19 of ES Appendix 8-6 such as 60 hectares of wildflower meadow and 63 hectares of set aside for ground nesting birds. These would

Reference	Comments/Issue raised	Applicant's Response
		comprise enhancements to the CNL's setting above and beyond the current baseline condition. For the Applicant's position on the statutory duty regarding the CNL, more detail is provided in the Applicant's Written Summary of Oral Submissions for Issue Specific Hearing 2 and Responses to Action Points [EN010168/EXAM/9.49].
RS-003	████████ explained that there are approximately 878 hectares of productive agricultural land which would be removed from food production at a time when the UK should be increasing domestic food production in the face of future threats from climate change. ██████ noted that South Cotswolds is valuable farming country, so the case for removing that land from food production has not been adequately made when there are viable alternatives on Brownfield Land, rooftops, lower quality sites, all of which are under-utilised. ████████ also noted that there would be adverse impacts on the rural economy, including farming and tourism which have not been adequately weighed against the scheme's benefits.	The Applicant notes this comment and refers to SE1.2 and SE1.3 in the Applicant's Response to the Examining Authority's First Written Questions [REP3-128] for impacts to rural employment and tourism respectively. With regard to brownfield land, rooftops and lower quality sites, the Applicant has considered brownfield land and rooftops as set out in its Site Selection Assessment Report [APP-185]. The assessment of previously developed/brownfield land identified no land of an adequate area to facilitate a large-scale solar project either individually or in combination with other sites (see table 2-2 of the site selection assessment report). Commercial rooftops were also considered, but initial considerations shows that it was unlikely that there would be rooftops or combined premises of an adequate area to facilitate a large scale solar project or provide a viable network of sites in close proximity that would be large enough to accommodate a project equivalent to the Scheme. As set out in the Statement of Need [REP1-085] the Applicant is supportive of rooftop solar but this is not seen as an alternative to the Scheme and should be deployed in addition to large scale solar farms,

Reference	Comments/Issue raised	Applicant's Response
		rather than instead of them. Lower grade agricultural land was preferred by the Applicant in its site selection assessment, with all grade 1, 2 and 3 land being excluded from the initial area of search. The initial potential development areas (PDAs) identified on lower grade agricultural land were discounted for reasons unrelated to ALC grade, and therefore the Applicant expanded its search to include Grade 3 agricultural land and some pockets of Grade 2 agricultural land. The Applicant has sought to limit the use of higher grade agricultural land where possible through design evolution and considers its use to be necessary and in line with the relevant planning policy (which does not prohibit its use). Further information, including how agricultural circumstances have been considered, is set out in the Planning Statement [REP3-082] (see from paragraph 8.3.244). In addition, and to address the ExA's first written questions regarding food security [see Examining Authority's First Written Questions [PD-010], the Applicant will submit a Farming and Food Security Technical Note at Deadline 4 [EN010168/EXAM/9.43] to provide additional details on the amount of BMV farmland in Wiltshire, and how much BMV land will be taken up by the Scheme in comparison to the amount of BMV at a county level. The Farming and Food Security Technical Note [EN010168/EXAM/9.43] also makes reference to government policy as well as industry papers addressing domestic food production and food security, and includes commentary on the specific impacts of the loss of farmable area on the holdings

Reference	Comments/Issue raised	Applicant's Response
		affected, derived through landowner questionnaire. The Applicant considers that the impacts on farming and food production have been adequately considered.
RS-004	████████ spoke about the large-scale battery energy storage systems. and the safety considerations but noted that others would speak about this.	The Applicant notes this comment and has previously fully addressed Ms Savage's representations on BESS safety concerns in pages 769 to 780 of the Applicant's Response to Written Representations [REP2-039] .
RS-005	████████ queried the payback period on the development, noting that in the developer's own assessment as reviewed by Wiltshire Council, indicates that the carbon break even point will not be reached until several decades into the projects operational lifespan. The timeline is relevant if the scheme is basing its legitimacy on the claim of climate credentials. ██████ finishes by urging the ExA to refuse the application as currently submitted.	Regarding the carbon break even of the project please refer to the Climate Response to Wiltshire Council Appendix B of Written Rep and SLD Appendix J1 [REP3-132] section 5 (5.1 and 5.2).

2.2 Daniel Kozelko on behalf Stop Lime Down

Reference	Comments/Issue raised	Applicant's Response
DK-001	██████████ explained that █████ speaks on behalf of Stop Lime Down (SLD), a community group brought together by the concern that Lime Down is the wrong scheme in the wrong place. █████ noted that SLD support solar panels and recognises the favourable policy in [NPS-EN1], including in the critical national priority infrastructure presumption. They do recognise that some schemes will be designed in the wrong place/wrong way. That will be where the mitigation hierarchy is not applied appropriately, and there will be an unacceptable risk to things like human health or flood. █████ further notes that the policy recognises that some schemes should be rejected notwithstanding the presumption which is just a starting point.	The Applicant does not accept that Lime Down is the wrong scheme in the wrong place for the reasons set out in the Site Selection Assessment Report [APP-185], the Technical Note on Site Selection Assessment [REP2-043] and the Applicant's previous responses to Stop Lime Down's submissions on site selection (see Applicant's Response to Relevant Representations Part 1 [PDA-009] and Applicant's Response to Written Representations [REP2-039]). With regard to the specific locations and concerns raised by Mr Kozelko, these are addressed in the following responses.
DK-002	██████████ explained the issues by imagining a walk across locations in the area where the proposed development is, noting the issues that may arise. ██████████ stated that walking from Sherston to the Fosse Way, along Sherston Walk, to SHER35 and LUCK57, it begins in the Cotswolds National Landscape which is an area of the highest level of landscape protection. He notes that applicants	The Applicant has assessed the likely effects to the recreational use of byway open to all traffic (BOAT) SHER35/LUCK57, the Fosse Way, and the Cotswolds National Landscape as a tourism destination. The detailed assessment in ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241] has found no significant adverse effects to BOAT SHER35/LUCK57 or to the CNL. The Applicant has assessed a long-term moderate adverse (and therefore significant) effect to the recreational use of the Fosse Way due to its historic significance being an attracting feature for recreational users, being impacted by direct

Reference	Comments/Issue raised	Applicant's Response
	accept some significant adverse effects, but SLD's experts believe there will be major significant adverse on the CNL. The area would be enveloped by solar in what was historically a tranquil area, but now faces audible electrical noise in the region of 50 decibels. The walk then joins onto an ancient Roman road connecting parts of the country will be beset by panels. ■ notes that a key heritage asset of the applicant has underassessed the significance and effect.	views of Lime Down B and C, and the use of the route for construction HGV traffic for the Scheme. In relation to the potential effects of the Scheme on the Roman Roads (i.e. the Fosse Way (HER ST88SE300) and Roman road from Bath to Speen (HER ST86NE30)), as well as other Roman archaeological assets are fully assessed in ES Volume 1, Chapter 12: Cultural Heritage [REP3-017], supported by detailed technical appendices in ES Volume 3, Appendices 12-1 to 12-7 [APP-219 to APP-231]. Since the design presented at PEIR stage, Field C26, the westernmost part of Field C25, and the majority of Field C13 have been entirely removed from the Order Limits. Solar PV Panels have also been removed entirely from within Fields B1-B5, C24-C25, and C13. A number of fields abutting the Fosse Way within which Solar PV Panels will be erected have had offsets established with their boundaries with Fosse Way, including Fields B6, C10-C12, and C22-C23. ES Volume 3, Appendix 12.1: Heritage Statement [APP-219] identified that the overall setting and significance of the Fosse Way will remain intact, and the asset will retain its legibility as a roadway within a largely agrarian landscape. Consequently no significant effects were identified to the asset. With regards to noise and with reference to Annex G of the Applicant's Response to the Examining Authority's First Written Questions [REP3-128], noise from the Scheme does not reach 50 decibels on any of the mentioned routes and is only around 50 decibels for very short sections of routes such as HULL1 and SHER16. Typical levels on Public Rights of Way are around 30 decibels.

Reference	Comments/Issue raised	Applicant's Response
DK-003	Walking from Hullavington to Corston, along HULL 6, 7, and 8, are well used routes which will be used by large numbers of HGVs with little space to pass. Walkers will walk along a footpath to Corston, overlooked by 132 kV substation, experiencing what the applicants accept is significant, adverse visual effects at all stages.	The Applicant has assessed the likely effects to the recreational use of footpaths HULL6 and HULL8, to bridleway HULL7, and the connecting unsurfaced road known as 'Down Road'. The detailed assessment in ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241] has found no residual significant adverse effects to any of these routes subject to additional transport safety management for users of HULL7 during construction. This is secured through the Outline Construction Traffic Management Plan (CTMP) [REP3-108] by Requirement 15 in Schedule 2 of the Draft Development Consent Order (DCO) [REP3-005] . The long-term effect on each of these routes during the Scheme's operation is a moderate-minor effect, which is also not significant.
DK-004	Then if you walk through a floodplain and the Corston Brook, which because of the scheme would flood more frequently and more severely down into Corston.	The Applicant does not accept this comment. The submitted flood risk and drainage assessment does not identify any material increase in flood frequency or flood severity at Corston as a result of the Scheme. Solar PV panels are elevated above ground and would not operate as impermeable hardstanding or a connected drainage catchment. Rainfall would continue to drain to the ground beneath and between the panel rows. Formal impermeable infrastructure, where proposed, would be subject to controlled drainage, attenuation and discharge controls through the relevant FRA and Drainage Strategy and the detailed drainage design secured under Requirement 11: Surface Water Drainage of the Draft DCO [REP3-005] .

Reference	Comments/Issue raised	Applicant's Response
		Construction phase runoff and soil compaction risks would be managed through Outline Construction Environmental Management Plan (CEMP) [REP3-092], specifically Section 3.6, Table 5: Hydrology, Flood Risk and Drainage, which sets out controls for discharge/disposal of site runoff, temporary drainage, flood risk and silt management, and Section 3.12, Table 11: Soils and Agriculture, which sets out soil management and monitoring requirements. Further soil handling and compaction controls are set out in Outline Soil Resources Management Plan [REP3-098], specifically Section 1.8: Soil handling methods, including paragraphs 1.8.1 to 1.8.14 on soil handling, soil moisture conditions and rainfall protocols, and paragraphs 1.8.33 to 1.8.36 on soil monitoring and compaction inspection. The Applicant therefore does not accept that the Scheme would cause Corston Brook to flood more frequently or more severely downstream at Corston.
DK-005	Walking from Norton to Bradfield Manor, along NORT10 and HULL1, you will pass from a village surrounded on all major exit routes by solar and with noise from 1GW Bess, along a footpath enveloped by solar, which the applicant accepts will cause significant adverse visual effects at all stages of the scheme. Solar infrastructure will be visible through fencing on what was once used as agricultural land.	The Applicant has assessed the likely effects to the recreational use of footpath HULL1 / NORT10. The detailed assessment in ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241] has found no greater than a long-term moderate-minor adverse effect at any phase of the Scheme, which is not a significant effect. This assessment outcome is due to the interaction of users with visual and auditory changes to their experience, instances where construction and then later operational maintenance traffic would cross the footpath, with consideration also given to the improvement in connectivity to footpath HULL2 through the proposed permissive footpath between HULL1 and HULL2. This is secured through the Outline

Reference	Comments/Issue raised	Applicant's Response
		Public Rights of Way and Permissive Paths Management Plan [REP1-104] by Requirement 16 in Schedule 2 of the Draft DCO [REP3-005]. ES Volume 1 Chapter 8 Landscape and Visual [REP3-025] recognises the change to the visual amenity and associated adverse effects to users of those PRow that are located within the array itself or directly adjacent. The design of the scheme has embedded buffers into the proposed layout, specifically a 15m offset to any proposed infrastructure on either side of any PRow. Where PRow directly cross the array, this creates a corridor with a minimum width of 30m wide between proposed fencelines through the array. There would then be a gap of 4m between the fence line and the proposed panels resulting in a minimum total width of 38m between the panels where PRow cross the arrays. The Applicant acknowledges that users of both WT NORT 10 (TP116) and WT HULL 1 (TP121) would experience Significant Adverse visual effects as a consequence of the Scheme for the lifetime of the Development. Both routes are Public Footpaths that pass directly through the array areas and would therefore experience a high magnitude of change (reducing to medium following establishment of the landscape proposals) as a consequence of the change from agricultural farmland to a solar development. In relation to noise and with reference to Annex G of the Applicant's Response to the Examining Authority's First

Reference	Comments/Issue raised	Applicant's Response
		Written Questions [REP3-128] , noise from the Scheme along these routes would vary between 30 and 50 decibels, which is not dissimilar to existing ambient sound in the area, as presented in Plate 1 to Plate 16 of ES Volume 3, Appendix 14-3 Baseline Noise Survey [APP-236] .
DK-006	There is a grade 1 listed building, the subject of a significant planning protection and a dwelling, the applicant will try to squeeze in just under the sole noise level instead of mitigating as far as it can in line with the NPS. At the manor, panels glint on the road which the applicant dismisses merely because of a number of road users on them rather than the actual safety risk posed by glint and glare. The applicant has avoided significant effects on assets of the highest protection. The scheme is one of the longest solar cable routes at 22km, and there is glint and glare effects pose a real risk to human health, flood matters which materially increase. This is a scheme which is exceptional in its harm to rural villages heritage assets, landscapes of the highest value and peoples' lives, both those that live and visit and whose income and survival depend on the landscape. This is for a scheme that the applicant cannot confirm will exist in full for 60 years. The ExA should	As stated in ES Volume 3, Appendix 12-1: Heritage Statement [APP-219] when considering the contribution of setting to the significance of the Grade I Listed Bradfield Manor (NHLE: 1198808), the asset is largely defined and experienced from within the Bradfield Manor grounds, in particular the walled courtyard to the south-west of the asset, where the full architectural interest of its south-facing primary elevation can be appreciated. Lime Down D is located within agricultural land to the north of asset. Following advice provided by Historic England panels in Field D5 were set back away from Grade I Listed Bradfield Manor and enhanced screening is proposed along existing hedgerows. Views of the proposed BESS and 400 kV Substation from Bradfield Manor Farmhouse will be largely mitigated by the proposed new woodland belt along the south-eastern boundary of Field D3 which, in combination with the existing woodland block west of D1 and south of D22, provides extensive screening in views to and from Bradfield Manor Farmhouse. It was identified that there would be a moderate / minor (not significant) adverse effect to the asset (less than

Reference	Comments/Issue raised	Applicant's Response
	recommend to the secretary of state to withhold consent.	substantial harm at the lower end in NPPF terms) as a result of indirect (i.e. setting) impacts. The Applicant has mitigated noise from the central BESS area as far as reasonably practicable, in line with national policy for levels between the Lower Observed Adverse Effect Level (LOAEL) and Significant Observed Adverse Effect Level (SOAEL). Further detail has been provided in item NV1.11 of the Applicant's Response to the Examining Authority's First Written Questions [REP3-128]. Glint and Glare effects are not known to significantly affect human health, and the Solar Photovoltaic Glint and Glare Study [APP-261] has considered potential impacts upon residential amenity and road safety, amongst other matters. Local roads are considered of a lower sensitivity under Pager Power's Glint and Glare Guidance due to the traffic volumes and typical road complexity, which directly affects the potential for impacts upon safety. As a result, glint and glare has not been considered separately to general impacts on amenity in the assessment of health and wellbeing impacts in ES Volume 1, Chapter 18: Human Health [APP-070]. This is due to the assessment outcomes that glint and glare impacts on residential receptors are not anticipated to be significant. Section 3.18 of the Outline CEMP [REP3-092] contains mitigation measures in respect of glint and glare. As per Requirement 13 (Construction environmental management plan)

Reference	Comments/Issue raised	Applicant's Response
		of Schedule 2 (Requirements) to the Draft DCO [REP3-005], no part of the authorised development may commence until a construction environmental management plan for that part has been submitted to and approved by Wiltshire Council. These measures are therefore already secured by Requirement. In relation to flood risk, the Applicant does not agree that the Scheme would materially increase flood risk. The submitted assessment has considered fluvial flood risk, surface water flood risk, groundwater flood risk, drainage impacts and construction phase risks. It does not identify any material increase in flood risk to downstream communities as a result of the Scheme. Solar PV panels would be elevated above ground and would not operate as impermeable hardstanding or a connected drainage catchment. Rainfall would continue to drain to the ground beneath and between the panel rows. Formal impermeable infrastructure would be subject to controlled drainage, attenuation and discharge controls through the relevant FRA and Drainage Strategy and the detailed drainage design secured under Requirement 11: Surface Water Drainage of the Draft DCO [REP3-005].

Reference	Comments/Issue raised	Applicant's Response
		Construction phase runoff and soil compaction risks would be managed through the Outline CEMP [REP3-092] and Outline Soil Resources Management Plan [REP3-098]. The value of the Landscape associated with the Scheme has been robustly assessed within the ES Volume 1 Chapter 8 Landscape and Visual [REP3-025] and ES Volume 3 Appendix 8-3-2-2 Landscape and Visual Assessment Sheets Significant [REP3-044]. A standalone Assessment on the CNL and its Special Qualities has been undertaken in ES Volume 3 Appendix 8-6 Assessment of Effects on the Cotswolds National Landscape and it's Special Qualities [APP-197]. The value of the CNL has been assessed as having a High Value, consistent with its designation, However, land within the Scheme identified for panels is outside of the CNL, with parts of Site's A, B and C agreed to be within the setting of the CNL. The LVIA set out in ES Volume 1 Chapter 8 Landscape and Visual [REP3-025] assessed land within the setting of the CNL to also be of High Value. This reflects the proximity to the CNL and its complementary landscape character. Although the character of the landscape is complimentary its condition is not. Land within and outside the CNL is distinctly different. There is a visible absence of stone walls within the landscape outside of the CNL, a defining special quality of the CNL which is clearly visible within the CNL. There is also a visual difference in the scale and pattern of fields and associated land use where smaller fields of pasture

Reference	Comments/Issue raised	Applicant's Response
		are characteristic within the CNL whilst larger arable fields define the landscape beyond the CNL. Despite this, the value of Sites A, B and C where within the setting of the CNL have been assessed as having a High Value at all levels of the Assessment.
DK-007	The ExA asked that the different walks are marked up on a plan and submitted for deadline 4? [REDACTED] confirmed.	The Applicant notes that a plan showing the walks described will be provided by Stop Lime Down at Deadline 4, and the Applicant will consider this and provide a further response, if required, at Deadline 5.

2.3 Toby Sturgis

Reference	Comments/Issue raised	Applicant's Response
	■ noted that works were regularly maintained with periodical dredging by the Environment Agency and others. More recently, the changing weather patterns, with increased flows and regular flooding are causing more restrictions on the access roads due to the depth of the water. The Rodbourne Brook and the Corston Brook, flowing from Lime Down, both enter the River Avon within the Somerfords above the C66. These gauze flooding at two locations on the C82. At peak flows, the C66, Great Somerford, Little Somerford, and the C77, Great Somerford to Dauncey are both impassable.	Formal impermeable infrastructure, including substations, the BESS Area and associated hardstanding, would be subject to controlled drainage, attenuation and discharge controls through the relevant FRA and Drainage Strategy and the detailed drainage design secured under Requirement 11: Surface Water Drainage of the Draft DCO [REP3-005]. Construction phase runoff, sediment mobilisation and soil compaction risks would be managed through the Outline CEMP [REP3-092] and Outline Soil Resources Management Plan [REP3-098]. On this basis, the Applicant does not agree that the Scheme would worsen existing flooding on the C66, C77, C82 or within the River Avon catchment downstream of the Scheme.
TS-003	■ notes that Great Somerford Parish Council object to Lime Down's application for only considering flooding within their own site. There is a lack of information on existing flows from water courses discharging from the site, discharges from the panel, and drainage around the infrastructure, with no modelling of peak flows at times when the water is high and the fields are at full capacity. Experience on similar soils in our Parish shows high volumes discharges from historical land drainage schemes, at times of intense rainfall,	The Applicant notes Great Somerford Parish Council's concern regarding existing downstream flooding and historical land drainage. The Applicant does not agree that the assessment only considers flooding within the Site. The FRA and Drainage Strategy considers watercourses, surface water flow routes, downstream receptors, construction phase risks, formal drainage areas and the potential for off-site flood risk.

Reference	Comments/Issue raised	Applicant's Response
	resulting in rapid rising of water levels in the water courses flowing to the River Avon. There is no consideration of historical drainage schemes within the site and the damage that may occur to them, which will result in an increase of surface runoff, erosion and silt being deposited in the mortar courses	Solar PV panels would be elevated above ground and would not operate as impermeable hardstanding or as a connected drainage catchment. Rainfall would continue to drain to ground beneath and between the panel rows. Formal impermeable infrastructure, including substations, the BESS Area and associated hardstanding, would be subject to controlled drainage, attenuation and discharge controls through the relevant FRA and Drainage Strategy and the detailed drainage design secured under Requirement 11: Surface Water Drainage of the Draft DCO [REP3-005]. The Applicant recognises that agricultural land can contain existing field drainage. Where existing field drains are identified during detailed design or construction, they will be avoided where practicable. Where avoidance is not practicable, affected drains will be appropriately protected, diverted, repaired or reinstated so that the existing land drainage function is maintained. Construction phase runoff, sediment mobilisation, erosion and soil compaction risks would be managed through Outline CEMP [REP3-092] and Outline Soil Resources Management Plan [REP3-098].

Reference	Comments/Issue raised	Applicant's Response
		On this basis, the Applicant does not agree that the Scheme would increase surface water runoff, erosion or silt deposition in downstream watercourses.
TS-004	Some developments in the area increased the flows on the River Avon, but these are restricted by sustainable urban drainage screens. In Great Somerford three developments in the last 10 years all have comprehensive sustainable urban drainage schemes. Therefore, suitable sustainable drainage schemes to control flows entering the water courses that discharge into the River Avon on the Parishes of the Somerfords be looked at, and Lime Down should contribute to the costs of mitigating flooding on the C82.	The Applicant notes the comment. The Scheme is not comparable to conventional built development where large areas of impermeable surfacing are introduced and connected to a positive drainage system. The solar PV panelled areas would remain permeable, with rainfall draining to ground beneath and between the panel rows. Where formal impermeable infrastructure is proposed, surface water runoff would be controlled through the relevant FRA and Drainage Strategy. This includes attenuation, controlled discharge and SuDS measures where required, with final detailed drainage design secured under Requirement 11: Surface Water Drainage of the Draft DCO [REP3-005]. The submitted assessment does not identify any material increase in downstream flood risk on the River Avon, the Somerfords or the C82 as a result of the Scheme. There is therefore no basis for requiring the Applicant to contribute to off-site flood mitigation works on the C82.

Reference	Comments/Issue raised	Applicant's Response
TS-005	Great Somerford maintains its flooding objection until there is evidence there will not be any increase in flooding on the access roads to the Somerfords.	The Applicant notes Great Somerford Parish Council's position. The submitted flood risk and drainage assessment does not identify any material increase in flood risk to the access roads serving the Somerfords as a result of the Scheme. Solar PV panels would not operate as impermeable hardstanding or as a connected drainage catchment. Formal impermeable infrastructure would be subject to attenuation, controlled discharge and detailed drainage design secured under Requirement 11: Surface Water Drainage of the Draft DCO [REP3-005]. Construction phase runoff and sediment risks would be controlled through the Outline CEMP [REP3-092] and Outline Soil Resources Management Plan [REP3-098]. On this basis, the Applicant does not agree that the Scheme would increase flooding on the access roads to the Somerfords.
TS-006	The Applicant should contribute towards costs for maintenance of road C82.	The Applicant notes the request for contributions towards costs for the maintenance of the C82 road. Whilst the road sits outside of the project order limits and is not proposed as a construction traffic routes, the Applicant is committed to a voluntary Community Benefit Fund (CBF). The purpose of this fund is to recognise and contribute to local needs in the communities closest to the project

Reference	Comments/Issue raised	Applicant's Response
		through initiatives that are not necessarily associated with the Scheme's technical mitigation. The Applicant invites local stakeholders to engage through the Community Liaison Group (CLG) and the future CBF structure to determine how voluntary funding can best support the community's local infrastructure priorities.

2.4 Debbie Lawley

Reference	Comments/Issue raised	Applicant's Response
DL-001	██████ introduced █████ as the Chair of Hullavington Parish Council. █████ notes that █████ submitted a written representation but will highlight the specific evidential gaps that remain because the applicant is not engaged with the issues raised. There are four examples she addresses.	The Applicant notes this comment.
DL-002	██████ notes that following the written representation responding to exam 9.1, the applicant did not provide a further response addressing █████ concerns. There has been no settlement, level assessment, correction of the landscape baseline, response to the evidence on construction impacts, engagement with the safety issues on the rural road network, cumulative assessment at the parish scale. Evidence submitted remains unchallenged.	The Applicant has provided initial responses to Hullavington Parish Council's Relevant Representation response at HPC-001-043 of The Applicants Response to Relevant Representations (Part 1) [PDA-009]. The Applicant is in dialogue with Wiltshire Council and SLD consultants to try to agree a position and way forward in relation to construction trip numbers and therefore impact. In relation to this, further information on trip generation will be submitted within ES Volume 3, Appendix 13-1: Transport Assessment to be submitted at Deadline 5. ES Volume 1 Chapter 8 Landscape and Visual [REP3-025] has been undertaken with consideration of the appropriate and relevant guidance and robustly assesses both the landscape and visual effects of the Scheme independently to ensure both the impacts and effects on the fabric and character of the landscape are taken into account as well as the views and visibility. A detailed LVIA methodology is included within ES Volume 3,

Reference	Comments/Issue raised	Applicant's Response
		Appendix 8-1 Landscape and Visual Impact Assessment Methodology [REP1A-006].
DL-003	██████ further notes that walk 8 is a named community route that passes under a narrow railway bridge with no pavement/refuge, it is used by cyclists and pedestrians daily to access the only café in the parish. The independent relative transport report projects a 194% increase in HGV movements on routes affecting Hullavington. ██████ further notes that the applicant's response is a management plan with GPS trackers and contractual penalties. A contractual penalty does not physically stop a 40-tonne vehicle from entering a narrow lane, she notes that a driver approaching from the east facing a long detour will be sent through Hullavington by satnav at the railway bridge on Walcate, but there will be nowhere to step aside. ██████ notes it is not a theoretical concern but rather a foreseeable safety hazard on a named route that the applicant has not assessed.	The Applicant acknowledges that Hullavington Village Community Group's Walk 8 is routed along the road between Hullavington village and Bradfield Cottages, with this same link providing the most direct access for villagers to access the Flying Monk Café and Taproom. The Applicant acknowledges that this stretch of road has no footway and in locations such as under the railway bridge, limited verge width. As such, it is understood that at present pedestrian users already (where able) use the verge to step off the road for large vehicles passing. Cyclist also already have to share this route with some large vehicles, such as agricultural tractors and trailers, and any HGVs, light goods vehicles, and recovery vehicles accessing the commercial units to the north of the railway at the Old Railway Yard, Hullavington. Whilst this route has not been specifically assessed, ES Volume 1: Chapter 16: Socio-Economics, Tourism and Recreation [APP-068] finds the effect on the local highway network for recreational users is medium-term temporary minor adverse effect and therefore not significant. Connecting PROWs (HULL2, HULL4, and HULL5) have been found to have up to a temporary moderate-minor adverse effect during construction, which is also not a significant effect. This may serve as a more accurate proxy for this specific route due to the specific constraints to non-motorised users in this location.

Reference	Comments/Issue raised	Applicant's Response
		The Applicant's analysis results in a peak of 56 HGV movements over a day on this route resulting in 8 movements an hour (1 every 7.5 minutes). The applicant is in dialogue with WC and SLD consultants to try to agree a position and way forward in relation to construction trip numbers and therefore impact. In relation to this, further information on trip generation will be submitted within ES Volume 3, Appendix 13-1: Transport Assessment to be submitted at Deadline 5. The construction routes have been selected to avoid routing through Hullavington centre. The delivery drivers will follow the logistics app rather than a standard satnav so will stick to the proposed routes and not travel through Hullavington centre.
DL-004	██████ notes that after submitting the application, the applicant added 15 new land parcels solely to accommodate the abnormal loads needed to move the transformers, which is not a refinement. In the responses to relevant representation (part one, page 1654), the applicant states that Hullavington is 'one of the communities most likely to be affected by the scheme, with greater sensitivity to changes in its visual surroundings' and that 'the scheme will change that character [and] potentially the quality of life for residents and visitors with effects that are ... long term through the construction, operational and decommissioning phases'. These are the	The Applicant notes that the 15 localised changes were presented during targeted consultation held from 3 June to 11 July 2025, before submission of the DCO application, to provide consultees with an opportunity to comment on them. Of these 15 amendments, six relate to temporary highway and traffic works required to safely accommodate AIL vehicle movements, while the remaining nine relate to access, cable routing and avoiding constraints such as woodland and hedgerows. The AIL-related amendments are considered refinements because they are limited, localised and temporary in nature, involving works such as minor junction widening, temporary removal of street furniture, vegetation clearance or overrun areas. They do not change the nature of the Scheme and have been

Reference	Comments/Issue raised	Applicant's Response
	applicant's own words. [REDACTED] queries why these are not significant adverse effect on the well being of the residents, and that there is a gap between those concessions and the conclusion has not been bridged by evidence but rather rests entirely on untested consultant judgment. [REDACTED] further notes that school children travel on these lanes to school, and elderly residents rely on the same bus routes for essential services, they are the daily operational realities of a rural community, and the applicant has not assessed the impact of construction traffic on these essential movements. The outline CEMP and OCTMP remain generic and do not address the constraints of the rural road network or the safety of the residents. The applicant has not responded to the written representation, and key elements of the evidence remains incomplete. The statutory highways authority raised fundamental concerns, the applicant's own documents contain concessions that contradict their conclusions, and the Parish specific impacts on Hullavington have not been assessed. [REDACTED] asked the ExA to give weight to the fact that the evidence remains unchallenged and	reviewed as part of the environmental assessment, which confirms that they do not give rise to any change in the likely significant effects. The applicant is in dialogue with WC and SLD consultants to try to agree a position and way forward in relation to construction trip numbers and therefore impact. The construction route was intentionally selected to avoid routing through Hullavington and avoid school routes.

Reference	Comments/Issue raised	Applicant's Response
	to require the applicant to provide the missing assessments to the impacts on Hullavington can be properly examined.	

2.5 Magaly Etter

Reference	Comments/Issue raised	Applicant's Response
ME-001	██████ introduced herself as a sustainability manager at Whatley Manor, █████ is not opposed to renewable energy, noting that they received EarthCheck Gold Certification and are among a very small number of hotels in the UK to do so.	The Applicant notes this comment.
ME-002	██████ notes that the proposed development would directly and materially harm the Hotel. Guests come to Whatley Manor to seek peace, quiet and the beauty of the countryside with many guests being return guests. The development would impact this, as guests enjoy walks, cycle rides, and tranquillity. Specifically, construction on this scale will generate significant airborne dust that will not remain contained, impacting plant health across 12 acres of carefully maintained grounds, bee colonies, homegrown produce, and wider biodiversity. It will also affect bird songs, wedding and spa guests, and couples who want a peaceful stay. Development also affects the ability to maintain the EarthCheck Gold status, which requires	The potential effects of the Scheme on tourism and recreation are assessed in ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068], supported by ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]. Whilst the business at Whatley Manor has not been individually assessed, the Aquarius Spa, as a separate spa and gym facility has been assessed due to its recreational function. The assessment of Aquarius Spa in ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241] finds no greater than a negligible adverse effect to users due to only distant views of the Scheme being likely from the facility, and very limited impacts from construction traffic movements, due to its preferable connections by road to the A429 at Malmesbury and A433 at Westonbirt. The Applicant considers this assessment can be used as a proxy for likely effects to users of the hotel at Whatley Manor. The assessment of economic impacts in ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068] considers baseline tourism activity, visitor attractions, recreational assets and tourism-dependent

Reference	Comments/Issue raised	Applicant's Response
	continuous audited performance across many factors.	businesses within the study area. The assessment evaluates potential effects on the use, enjoyment and desirability of nearby tourism destinations, including impacts on individual visitor attractions, recreational routes, events and businesses reliant on tourism. It also considers whether changes to landscape character or visual amenity could influence visitor behaviour. The assessment identifies a worst-case scenario in which a temporary loss of up to 50 tourism-related jobs could occur locally during construction, and a long-term loss of up to 11 tourism-related jobs could occur during the operational phase of the Scheme. This represents a precautionary estimate based on conservative assumptions. The assessment concludes that, while some localised effects on tourism receptors are anticipated to occur, significant adverse effects on the wider tourism economy are not anticipated. The Applicant acknowledges the concerns raised regarding potential construction dust effects on the hotel, its grounds and guests. However, the construction dust assessment presented in ES Volume 3, Appendix 15-1 Construction Dust Methodology and Assessment [APP-238] has been undertaken in accordance with best practice guidance and adopts a precautionary worst-case approach in relation to sensitive receptors. The assessment concludes that, with embedded mitigation measures in place, the Scheme would not give rise to significant adverse effects at human or ecological receptors. Mitigation measures to control dust emissions during construction are set out in the Outline

Reference	Comments/Issue raised	Applicant's Response
		CEMP [REP3-092] and include dust suppression and site management controls.
ME-003	████ further noted that it risks the ecological integrity of the grounds and places an ongoing operational burden on the team to manage the effects of prolonged industrial activity on the Manor's doorstep. They will absorb the environmental cost and derive no benefit.	Potential impacts on ecology and biodiversity are fully assessed in ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015], including consideration of habitat connectivity across the Order Limits and surrounding landscape. This assessment considers baseline ecological conditions and evaluates likely significant effects arising during the construction, operation and decommissioning phases of the Scheme. It identifies avoidance, mitigation and enhancement measures to address potential impacts on habitats and protected and notable species. It also identifies opportunities for ecological enhancement, including the creation and long-term management of habitats, and delivery of biodiversity net gain. The assessment concludes that no significant adverse effects on ecology and biodiversity are anticipated during construction or operation, with the exception of skylark and hedgerows. Residual significant adverse effects on these receptors are anticipated at a local-level of geographical importance only. Given that the hotel is located wholly outside of the Order Limits, no direct impacts to the ecological value of the hotel and its grounds are anticipated. Potential adverse effects of the Scheme on ecology and biodiversity are not anticipated to extend beyond the Order Limits, and proposed habitat creation and enhancement measures have been designed to maintain ecological integrity at

Reference	Comments/Issue raised	Applicant's Response
		the Solar PV Sites and strengthen existing ecological networks. Habitat creation, enhancement and management measures are set out within the Outline Landscape and Ecological Management Plan (LEMP) [REP3-100] and secured through DCO Requirements.
ME-004	██████r notes that there has not been any engagement with Whatley Manor, a leading hotel employing over 100 people and welcoming 10,000 guests annually, contributing significantly to the local economy. That is not acceptable. ██████ urges the ExA to enquire that they are.	Whatley Manor was located within the Core Consultation Zone as shown in the Consultation Report Appendix E [APP-033] and therefore was invited to non-statutory consultation, and statutory consultation under Section 47 of the Planning Act, prior to the DCO application being submitted. Where representations were made, these were responded to in writing at the point of DCO submission in the Consultation Report Appendix F-7 [APP-040]. The potential effects of the Scheme on tourism and recreation are assessed in ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068], supported by ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]. Whilst the business at Whatley Manor has not been individually assessed, the assessment of Aquarius Spa in the ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241] finds no greater than a negligible adverse effect to users. The Applicant considers this assessment can be used as a proxy for likely effects to users of the hotel at Whatley Manor. The assessment of economic impacts in ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-

Reference	Comments/Issue raised	Applicant's Response
		068] considers baseline tourism activity, visitor attractions, recreational assets and tourism-dependent businesses within the study area. The assessment evaluates potential effects on the use, enjoyment and desirability of nearby tourism destinations, including impacts on individual visitor attractions, recreational routes, events and businesses reliant on tourism. It also considers whether changes to landscape character or visual amenity could influence visitor behaviour. The Applicant has discussed the approach to assessment of tourism impacts with Wiltshire Council's Economic and Regeneration Team and those discussions have been set out in the Statement of Common Ground with Wiltshire Council [EN010168/EXAM/8.2] (Revision 2), which has been submitted at Deadline 4.

2.6 Christian de Coulon

Reference	Comments/Issue raised	Applicant's Response
CdC-001	██████████ introduced ██████████ a luxury hotel, ██████ sits on the board of the Environmental Foundations and competed internationally as a professional event rider. ██████ highlights that he is not opposed to solar energy, noting that Watley Manor heavily invested and continues to invest in sustainability.	The Applicant notes this comment.
CdC-002	The proposed development is the industrialisation of more than 3000 acres at an area of outstanding natural beauty, and this designation exists because the landscape is exceptional. Once an industrial development of this scale is imposed, the protection loses value, ██████ disagrees that the applicant thinks the impact on the rural community will be limited. ██████ notes that tourists do not travel to the area to look at the solar panels, substation, security fencing, CCTV, access roads.	The land within the Scheme identified for panels is located outside of the CNL. The Applicant acknowledges that parts of Site's A, B and C are located within the setting of the CNL. Please see the Applicants response to RS-002 above which sets out how the Scheme has sought to further the purposes of the CNL, a matter agreed with the CNLB within their comments on any other submissions received at deadline 2 [REP3-154]. As part of the Change Application, the Applicant has also removed panels from C9, which is within the setting of the CNL. The potential effects of the Scheme on tourism and recreation are assessed in ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068], supported by ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]. The assessment of economic impacts to tourism and recreation in ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068] considers baseline tourism activity, visitor attractions, recreational assets and tourism-

Reference	Comments/Issue raised	Applicant's Response
		dependent businesses within the study area. The assessment evaluates potential effects on the use, enjoyment and desirability of nearby tourism destinations, including impacts on individual visitor attractions, recreational routes, events and businesses reliant on tourism. It also considers whether changes to landscape character or visual amenity could influence visitor behaviour. The assessment identifies a worst-case scenario in which a temporary loss of up to 50 tourism-related jobs could occur locally during construction, and a long-term loss of up to 11 tourism-related jobs could occur during the operational phase of the Scheme. This represents a precautionary estimate based on conservative assumptions. The assessment concludes that, while some localised effects on tourism receptors are anticipated to occur, significant adverse effects on the wider tourism economy are not anticipated.
CdC-003	The area also sustains livelihoods and supports farmers, pubs, restaurants, cafes, holiday cottages, farm shops and others. ■ queries why Whatley Manor is not meaningfully assessed in the applicant's socio-economic impact work, nor been consulted with. This brings into question whether the wider economic impact has been properly understood.	The Applicant notes this comments and refers to the assessment within ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]. Losses to tourism-dependent industries has been derived from the assessment of impacts to individual tourism and recreation assets in ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]. Whilst the business at Whatley Manor has not been individually assessed, the Aquarius Spa, as a separate spa and gym facility has been assessed due to its recreational function. The assessment of Aquarius Spa in ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241] finds no

Reference	Comments/Issue raised	Applicant's Response
		greater than a negligible adverse effect to users due to only distant views of the Scheme being likely from the facility, and very limited impacts from construction traffic movements, due to its preferable connections by road to the A429 at Malmesbury and A433 at Westonbirt. The Applicant considers this assessment can be used as a proxy for likely effects to users of the hotel at Whatley Manor. The magnitude of impact to these receptors in each super-output area within the 5 km Study Area have been considered against estimated employment in retail, accommodation, food and drink services, arts and cultural, and recreation and sports industries for the same area. The estimated employment is taken from the Business Registry and Employment Survey for 2023 (the most recent data available pre-submission). A representative 'loss' of visitor spending, and thus on employment, has been applied based on the type of effect anticipated: i.e. impacts to PROWs are likely to have an impact on visitor numbers, thus affecting all industries, while impacts to specific receptors (such as museums, or sports facilities) are more likely to have impacts that specifically affect that industry. This has been done for each assessed phase of the Scheme, hence why each phase has a separately assessed tourism related job loss.
CdC-004	█ is also concerned about the construction impact as the roads were never designed to sustain heavy construction traffic. The consequences for horse riders, dog walkers,	See response to TT1.18 in The Applicant's Response to the Examining Authority's First Written Questions [REP3-128] . This sets out how the likely effects of the scheme in relation to Non-Motorised Users has been assessed and supports the

Reference	Comments/Issue raised	Applicant's Response
	cyclists, walkers, residents and visitors are obvious.	conclusion of no significant effects presented in ES Volume 1, Chapter 13 Transport and Access [REP3-065]. It also sets out how specific mitigation and measures within the Outline CTMP [REP3-108] will take account of Non-motorised Users. As no significant adverse effects to non-motorised users of highways has been determined in ES Volume 1, Chapter 13 Transport and Access [REP3-065], subsequently the assessment in ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068] finds no significant adverse effects to the recreational use of the local highway for walkers, wheelers, and riders during the construction phase of the Scheme.
CdC-005	■■■ concludes by stating that the decision is more than energy generation, its about whether a nationally protected landscape is genuinely protected, whether rural livelihoods matter, and that future generations will inherent an industrial energy estate. There are more appropriate places for large scale solar development, and ■■■ urges the ExA to refuse the application.	In relation to the point raised on landscape, please see response to CdC-002 above. The Applicant confirms that rural livelihoods have been considered both in their economic context, and in their social and wellbeing context. The assessment in ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068] finds no significant adverse effect to the local agricultural or tourism industries at any phase of the Scheme. No greater than a 0.3% impact to agriculture in Wiltshire, and a peak of 0.7% impact to tourism within the 5 km Study Area during construction, are anticipated from the Scheme. The assessment in ES Volume 1, Chapter 18: Human Health [APP-070] considers rurality as a part

Reference	Comments/Issue raised	Applicant's Response
		of community identity and culture. With the implementation of Scheme design measures and landscape mitigation to reduce impacts on rurality, the Scheme is not anticipated to have a significant adverse effect on community culture and identity. With regard to the Scheme's location, the Applicant has carried out a 6 stage site selection assessment as set out in the Site Selection Assessment Report [APP-185] together with additional consideration in response to comments received in the examination as set out in the Technical Note on Site Selection Assessment [REP2-043]. The conclusion of the Applicant's assessment is that there are no more suitable and available locations within the 25 km search area than the proposed location for the Scheme, based on the criteria identified. The Applicant considers its site selection assessment to be in line with NPS EN-1 (including but not limited to paragraphs 4.3.22 – 4.3.29), NPS EN-3 (including but not limited to paragraphs 2.10.18 – 2.10.34) and the requirements of Regulation 2 and paragraph 2 of Schedule 4 to the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017.

2.7 Christine Hamilton

Reference	Comments/Issue raised	Applicant's Response
CH-001	██████████ noted that Solar has its place in modern society but not at Lime Down, noting that the siting is beastly with nearly 300 batteries, each the size of a shipping container a few yards behind her home, and 38,000 solar panels around her home. ██████████ further noted the noise 24/7 and the development view from her upstairs and top of the garden.	Visual effects to occupants of Bradfield Manor (R1068) have been assessed within the ES Volume 1 Chapter 8 Landscape and Visual [REP3-025] with detailed assessments contained within ES Volume 3 Appendix 8-3-2-2 Landscape and Visual Assessment Sheets Significant [REP3-044]. The LVIA set out in ES Volume 1 Chapter 8 Landscape and Visual [REP3-025] concludes that as a consequence of the development, there would be Significant Moderate Adverse effects until Year 15, at which point in time, the mitigation measures would have established and would reduce adverse effects to no longer significant. The array is located approximately 250m from Bradfield Manor, with the proposed BESS area located approximately 820m north west of the dwelling and set in front of an existing block of woodland. The Mitigation proposals include for green corridor along the southern boundary of D3 and hedgerow reinforcement along the boundaries of D1, D2, D3, D5 and the wider Site and a new native woodland proposed in D5 to the rear of Bradfield Manor to protect the setting of the Grade I listed buildings and its associated grade II listed barns. A further triangular shaped native woodland is proposed in D1 along the railway line to provide landscape structure in character with the existing pattern of woodland and screening of the BESS area. A new gently sloping bund is proposed to the eastern and southern side of the BESS with

Reference	Comments/Issue raised	Applicant's Response
		proposed woodland continuing along the bund to screen the infrastructure and acoustic fence. As set out within Environmental Statement Volume 1, Chapter 3 The Scheme [APP-055], it is anticipated that approximately 270 BESS Containers will be included as part of the Scheme. In terms of noise, while there would be continuous noise from the Scheme at Bradfield Manor, Table 8 of the Outline Operational Environmental Management Plan [REP3-094] commits to this being below the level reported in the ES, which is 35 dB. This level is exceeded around 90% of the time under typical existing conditions during the day and is conducive to good sleeping conditions at night (as accepted by Wiltshire Council in their Response to the ExA's first written questions [REP3-142], item NV1.5).
CH-002	████ explained that there is a rare chance of a potentially lethal thermal runaway which threatens her home, and she (and any children and babies) would be sitting ducks, overwhelmed by toxic gas and smoke, which would quickly extend to Hullavington, where there is a primary school and the London South Wales Railway.	The Applicant has followed National Fire Chiefs Council (NFCC) guidance and commissioned a BESS fire emissions assessment (as detailed in ES Volume 3, Appendix 15-2: BESS Fire Emissions Modelling [REP2-013]) to model emissions to air and visibility impacts from a BESS fire on sensitive receptors within a 1km radius of the BESS area. The fire emissions modelled in the report were based upon recent UK Health Security Agency (UKHSA) requests for DCO BESS projects. The selected gases are representative of emissions recorded from a range of LFP battery systems integrated in

Reference	Comments/Issue raised	Applicant's Response
		current BESS designs. The UKHSA is a statutory consultee for the Scheme and has confirmed that they are satisfied with the Applicant's submitted documentation and BESS fire emissions assessment methodology and results. The spacing distances of the illustrative BESS site design are based upon Large Scale Fire Testing (LSFT) where no fire propagation occurred; therefore, modelling of a fire limited to one BESS container is a credible worst-case scenario. The BESS fire emissions assessment has concluded that there are no significant air quality or visibility impacts at all sensitive receptor locations. To validate the final BESS site design, the Applicant has also committed to commissioning an additional Plume Analysis Study at the detailed design stage as stipulated in Section 5.5.9 of the Outline BSMP [REP3-106] and secured through the DCO: "...at the detailed design stage a BESS system and site specific Plume Analysis study will be conducted to assess the environmental impact of a site incident to sensitive receptors within a 1 km radius. Toxic gas emissions to sensitive receptors must be below relevant public health exposure limit guidelines when the battery system of a BESS is fully consumed (burnt out), production of Particulate Matter (PM) and a visibility impact assessment on any transport links within a 1 km radius of the BESS area will also be included. The ERP produced at the detailed design stage (template outlined in Section 5.4.4) will incorporate all necessary

Reference	Comments/Issue raised	Applicant's Response
		emergency response procedures and actions based upon thermal runaway test data supplied by the BESS system provider.” An Outline BSMP [REP3-106] has been prepared for the Scheme using guidance from Dorset and Wiltshire Fire and Rescue Service and incorporating recommendations of the National Fire Chiefs Council. The safety objectives for the design of the BESS site are listed in Section 2.4 of the Outline BSMP [REP3-106]. The Outline BSMP [REP3-106] fully accommodates the latest BESS safety requirements contained in NFPA 855 (2026) ensuring that any credible risks associated with battery storage are either prevented or fully mitigated if a BESS failure occurs. As now mandated under NFPA 855 (2026) the Applicant will only be able to select a BESS system that has undertaken Large Scale Fire Testing (LSFT). At the detailed design stage, the selected BESS LSFT data will be leveraged to fully inform inputs for risk assessment tools which will be utilised together with detailed consequence modelling to provide a comprehensive site operations and emergency response safety audit, this is stipulated in the Outline BSMP [REP3-106] pre-construction requirements (Section 6). Section 2.4.2 of the Outline BSMP [REP3-106] stipulates: “<i>Final BESS design and site layout will have been validated through mandatory Large Scale Fire Testing (LSFT) and rigorous consequence modelling to minimise the requirement for any</i>

Reference	Comments/Issue raised	Applicant's Response
		<i>D&WFRS intervention in a thermal runaway incident. LSFT must establish minimum equipment spacing distances that demonstrate there is no fire propagation to adjacent BESS enclosures or ESS equipment. D&WFRS intervention in worst case scenarios would typically be limited to boundary cooling of adjacent BESS and Energy Storage System (ESS) units to prevent the fire from spreading. This strategy will be finalised with D&WFRS and be clearly communicated in the Emergency Response Plan (ERP);</i> <i>To ensure that fire, smoke, and any release of toxic gases does not significantly impact site operatives, first responders, and the local community; and</i> <i>To ensure that firewater run-off is contained and tested before release or, if necessary, removed by tanker and treated offsite.</i>
CH-003	The area also floods regularly and with the addition of solar panels, the volume and runoff rate would increase the flood risk. ■■■■■ believes the applicant has failed, deliberately or otherwise to give any estimates of potential pollution on the railway, ignoring the likelihood of toxic gas emissions, which would gravely threaten rail passengers. This could also affect surrounding villages and Malmesbury depending on wind conditions.	The Applicant does not agree that the addition of solar panels would increase runoff volume or runoff rate such that flood risk would be increased. Solar PV panels would be elevated above ground and would not operate as impermeable hardstanding or as a connected drainage catchment. Rainfall would continue to drain to ground beneath and between the panel rows. Formal impermeable infrastructure, including the BESS Area, substations and associated hardstanding, would be subject to

Reference	Comments/Issue raised	Applicant's Response
		controlled drainage, attenuation and discharge controls through the relevant FRA and Drainage Strategy and the detailed drainage design secured under Requirement 11: Surface Water Drainage of the Draft DCO [REP3-005]. Construction phase runoff, sediment mobilisation and soil compaction risks would be managed through the Outline CEMP [REP3-092] and Outline Soil Resources Management Plan [REP3-098]. In relation to emissions from a BESS fire, worst case sensitive receptor locations were included in the assessment (ES Volume 3 Appendix 15-2 BESS Fire Emissions Modelling [REP2-013]). As detailed in Section 2.3 of Applicant's Detailed Response to Stop Lime Down Deadline 1 Submission on BESS Fire Emissions [REP2-042], the dispersion modelling undertaken for the Scheme indicates that pollutant concentrations decrease rapidly with distance and reduce to negligible concentrations beyond 1 km. The assessment appropriately focuses on the area within which concentrations are highest and therefore most relevant for potential exposure. Given that the predicted concentrations are below the relevant health thresholds at worst-case receptors within 1km of the BESS, it can be concluded that there would be no risk of adverse effects at receptors, such as those in Malmesbury, beyond this distance. As detailed in Section 2.6 of Applicant's Detailed Response to Stop Lime Down Deadline 1 Submission on BESS Fire Emissions [REP2-042],

Reference	Comments/Issue raised	Applicant's Response
		the railway was not included as a human receptor for pollutant concentration assessment because it is not a publicly accessible location where individuals would reasonably be present for sustained periods, and any interaction between a passing train and a buoyant fire plume would be brief and transient in nature.
CH-004	■■■■ believes it is not a suitable site given its 22km from the grid connection. The BESS is roughly the size of Moss landing, which had a thermal runaway in January 2025. That needed 2.2 million litres of water in a closed-loop system. ■■■■ ■■■■ queries the applicants proposal of less than half a million litres that is not in a closed loop, which is less than a quarter needed at Moss Landing.	With regard to the Scheme's location and the length of the Cable Route Corridor, the Applicant has carried out a comprehensive site selection assessment as set out in the Site Selection Assessment Report [APP-185] including a review of 9 alternative locations (PDAs) for the Scheme against standardised assessment criteria such as potential effects on ecology, heritage, landscape and land use (including agricultural land) together with a high level review of other areas within the selected search area. This includes a number of PDAs closer to the point of connection. In addition to the assessment set out in the Site Selection Assessment Report [APP-185], the Applicant has reconsidered how the identified PDAs could be grouped together, has extended the search area for alternative sites to 25 km and has reconsidered additional land around the previously identified PDAs to check whether the addition of such land would affect its conclusions on the suitability of PDAs (see Technical Note on Site Selection Assessment [REP2-043]). The conclusion of the Applicant's assessment is that there are no more suitable and available locations within the 25 km search area than the

Reference	Comments/Issue raised	Applicant's Response
		proposed location for the Scheme, based on the criteria identified, including PDAs closer to the point of connection. The 22 km Cable Route Corridor has been assessed for environmental effects as set out in the chapters of the Environmental Statement [APP-052 to APP-265 as updated], based on the minimum and maximum parameters of the Scheme, and the mitigation and enhancement measures that are proposed to reduce these impacts. These effects are fully reported in the ES and are a matter for the Secretary of State to weigh in the planning balance against the need for the Scheme and its wider benefits. The length of the Cable Route Corridor is also broadly comparable to a number of other projects, including Island Green Power's consented DCOs for the Cottam Solar Project and West Burton Solar Project where the cable route corridors are just under 20 km. With regard to the risk of battery fire, the Applicant emphasises that the referenced Moss Landing fire involved old generation, legacy systems that were not compliant with NFPA 855 and UL 9540 integrating NMC pouch cell, air-cooled battery systems; these types of systems will not be considered for the Scheme. Section 4.1.30 of the Outline Battery Safety Management Plan (OBSMP) [REP3-106] stipulates the selected BESS design will integrate: "Battery liquid cooling systems with automated fail-safe

Reference	Comments/Issue raised	Applicant's Response
		operation (air cooling systems will not be considered for the Scheme)." The Moss Landing battery systems had not undertaken Large Scale Fire Testing (LSFT) and the sprinkler water suppression system performance had not been validated through large scale fire suppression testing (UL 9540A and / or 3rd party testing). It is not credible to consider that the range and impact of the Moss Landing smoke plume generated from more than 55,000 battery modules (which also burnt through a significant portion of the gas plant roof), is in anyway comparable to the potential impacts of a smoke plume generated from a fire within single non-combustible enclosure BESS designs typically containing 40-60 battery modules. As witnessed in numerous BESS LSFT (2024-2026), the peak of fire propagation of battery systems results in maximum flame heights of 4-5 metres out of the roof of the BESS. Typically, these flames are channelled through roof level deflagration vents resulting in peak flaming of 8-9 metres above ground level. Section 5 of the Outline BSMP [REP3-106] covers all requisite firefighting requirements for the Scheme including fire service access, firefighting water supply, and emergency planning requirements and is fully compliant with NFCC guidance. As now mandated under NFPA 855 (2026), the Applicant will only be able to select a BESS system that has undertaken Large Scale Fire Testing (LSFT). At the detailed design stage, the selected

Reference	Comments/Issue raised	Applicant's Response
		BESS LSFT data will be leveraged to fully inform inputs for risk assessment tools which will be utilised together with detailed consequence modelling to provide a comprehensive site operations and emergency response safety audit, this is stipulated in the Outline BSMP [REP3-106] pre-construction requirements (Section 6). Most current BESS systems are designed to safely burn out without internal fire suppression systems (to remove the risk of stranded energy in the battery systems), Large Scale Fire Testing (LSFT) must be conducted to demonstrate that loss will be safely limited to one BESS enclosure without the intervention of fire fighters. Most of these BESS designs integrate LFP prismatic cells and have demonstrated fire propagation does not occur to other BESS enclosures at distances ranging from 15cm – 100cm to adjacent or back-to-back BESS enclosures with spacing of 3-3.5 metres across from the next row / block of BESS enclosures. These BESS designs integrate high levels of thermal insulation to prevent a fire from spreading to adjacent BESS enclosures. The insulation is designed to ensure that external heat from a BESS fire does not increase internal temperatures of adjacent BESS to critical levels i.e. <100C. The illustrative BESS enclosure and site layout integrated equipment spacing from a BESS supplier which had conducted LSFT with spacing of 150mm between adjacent BESS enclosures with BESS unit heat flux measurement panels located 2.5 metres

Reference	Comments/Issue raised	Applicant's Response
		from the BESS and an egress heat flux gauge at 1.25m from the BESS (positioned at the front and back side of the initiating BESS enclosure). Fire did not propagate between BESS enclosures and heat flux data at heat flux locations was within limits to demonstrate that fire safety and propagation risks are mitigated. Sections 6.1.3 – 6.1.6 of the Outline BSMP [REP3-106] addresses the requisite risk assessments and consequence modelling that address all credible BESS failure events which will be provided at the detailed design stage. The Applicant will also commission site specific heat flux and flame tilt consequence modelling to account for site topography and wind conditions to establish final equipment spacing distances for the Scheme. Section 5.3.2 of the Outline BSMP [REP3-106] stipulates that: • “The firefighting water requirement will be fully assessed at the detailed design stage based upon analysis of Large Scale Fire Testing (LSFT) of the BESS design plus any additional BESS fire and explosion test data by an independent Fire Protection Engineer and water storage volumes will be agreed with D&WFRS during detailed design; and • If an internal BESS water based fixed suppression system (automatic or dry pipe) is integrated in the BESS enclosures a separate water supply and water containment system will be integrated. Any process water from the

Reference	Comments/Issue raised	Applicant's Response
		suppression system will be contained and subjected to the same accredited testing and characterisation regime as firewater runoff before any discharge or off-site removal." Section 5.5.2 of the Outline BSMP [REP3-106] stipulates: "D&WFRS in foreseeable and credible emergency response scenarios would most likely adopt a defensive firefighting strategy by using water on neighbouring areas such as battery enclosures and structures to cool down and prevent further fire spread. The Scheme will select a BESS design that has undertaken full scale free burn testing to demonstrate thermal insulation protection capabilities of the BESS enclosure design, validate equipment spacing distances, and demonstrate that deflagrations do not occur and/or can be safely constrained. In accordance with NFCC guidance, the Order Limits will be maintained to prevent a fire spreading to the BESS or inadvertently fire loading, by providing a 'bridge' or path between BESS enclosures to transmit flaming or radiant heat." Boundary cooling typically involves firefighters directing water fog or spray pattern discharge to ensure the incident does not spread to adjacent BESS enclosures. NFCC guidance states: "If it can be confirmed that the recommended firefighting tactic for the BESS is to defensively fire fight and boundary cool whilst allowing the BESS to consume itself, this will reduce the water requirements, and thus the drainage/environmental protection requirements significantly."

Reference	Comments/Issue raised	Applicant's Response
		If firefighters are applying water fog or spray patterns to adjacent BESS enclosures or deploying defensive spray plates that form a water curtain between the affected enclosure and adjacent BESS these "boundary cooling" tactics would likely be applied intermittently in 15-minute application periods with temperature changes measured between application periods. The peak fire load for most current BESS designs lasts for 1-3 hours and the rest of the fire, another 4-8 hours, would be at a lower intensity which reduces the impact of the fire. The maximum Peak Heat Release Rate (PHRR) occurs when propagation rate of battery cells is at peak level and decays to a smaller steady fire that is burning through fewer battery cells / modules and BESS system combustible materials. Boundary cooling would only be expected to be required during the peak fire load and is unlikely to be required if LSFT and rigorous consequence modelling has been conducted to demonstrate that loss will be safely limited to one BESS enclosure without the intervention of D&WFRs. NFCC, NFPA, FSRI (Fire Safety Research Institute), and all BESS OEMs advise that hose streams should not be directly discharged on BESS battery systems. Claims that millions of litres of water are required to tackle a single BESS fire are incorrect, this type of assumption is based upon two ground monitor units being deployed each discharging 1900 LPM for 24 hours, i.e. 5,472,000 litres of water directly on battery systems within a BESS enclosure. This tactic is not necessary and could create

Reference	Comments/Issue raised	Applicant's Response
		environmental pollution risks and significantly prolong any BESS fire event.
CH-005	██████ noted that the proposed development did not have to be adjacent to the railway and a grade 1 listed building, the origins of which were in the Domesday Book. █████ further noted that the attraction of the BESS is not to store electricity, but to import it from GRID when demand is low, and export it at peak times when the price is high. It is a money-grabbing opportunity. The owner will sell the windfall and leave for the results to fall on the locals, and rural England will be lost forever. █████ believes the landowners are selfish and Lime Down has no merit in planning terms and must not happen.	As stated in ES Volume 3, Appendix 12-1: Heritage Statement [APP-219] when considering the contribution of setting to the significance of the Grade I Listed Bradfield Manor (NHLE: 1198808), the asset is largely defined and experienced from within the Bradfield Manor grounds, in particular the walled courtyard to the south-west of the asset, where the full architectural interest of its south-facing primary elevation can be appreciated. Lime Down D is located within agricultural land to the north of asset. Following advice provided by Historic England panels in Field D5 were set back away from Grade I Listed Bradfield Manor and enhanced screening is proposed along existing hedgerows. Views of the proposed BESS and 400 kV Substation from Bradfield Manor Farmhouse will be largely mitigated by the proposed new woodland belt along the south-eastern boundary of Field D3 which, in combination with the existing woodland block west of D1 and south of D22, provides extensive screening in views to and from Bradfield Manor Farmhouse. It was identified that there would be a moderate / minor (not significant) adverse effect to the asset (less than substantial harm at the lower end in NPPF terms) as a result of indirect (i.e. setting) impacts. The Applicant recognises the historical importance of a Bradfield Manor Farmhouse and understands the desire to protect the rural

Reference	Comments/Issue raised	Applicant's Response
		character of the landscape. To address these concerns, the Scheme's design evolved through direct consultation with the respondent and Historic England, leading to refinements such as removing panels from the fields nearest the Manor and incorporating a new woodland screening belt to preserve the architectural setting of this heritage asset. The choice to locate key infrastructure near the main railway line was made specifically to cluster key elements within an existing infrastructure corridor, which the Applicant believes is a more responsible approach than introducing development into otherwise undeveloped rural areas. Regarding the concerns about project ownership and the role of the BESS, the Applicant wishes to clarify that the Scheme is a piece of Critical National Priority infrastructure essential for the UK's energy security and net-zero targets. While the BESS responds to market signals, its core purpose is to provide the grid flexibility needed to store abundant renewable power and displace carbon intensive generation during peak times. Finally, project stewardship is strictly governed by the Development Consent Order, which makes decommissioning and land restoration a legal requirement. These obligations are attached to the project itself, meaning any future owner is legally mandated to fulfil them, with failure to do so constituting a criminal offence The merits of the Scheme in planning terms have been weighed against adverse effects as set out in the planning balance at section 9 of the Planning Statement [REP3-081] and the

Reference	Comments/Issue raised	Applicant's Response
		Applicant considers that the planning balance is firmly in favour of making the development consent order. It will ultimately be for the ExA to make a recommendation and the Secretary of State to make a decision on the planning balance when determining the application.

2.8 Kim Langley

Reference	Comments/Issue raised	Applicant's Response
KL-001	██████ has a business in leisure and tourism. █████ is concerned over the impact of the Solar Park on █████ business and other businesses near the proposed site. █████ notes that █████ is not opposed to clean ways of producing electricity but does not want it damaging local communities and farmland. Clients stay at █████ B&B for beauty and tranquillity of the area, for walking and cycling. They visit the local villages and spend money.	The Applicant notes this comment and refers to SE1.3 in Applicant's Response to the Examining Authority's First Written Questions [REP3-128] for impacts to tourism and recreation.
KL-002	The Lime Down proposed application will have a corridor of solar panels around footpaths or down one side, affecting walkers' enjoyment. Additionally, it may change their experience if the roads have lorries carrying industrial cargo. After construction, there will be a monstrous sight of solar panels and horrendous humming of solar mechanisms.	Mitigation for PRow is set out in the Outline LEMP [REP3-100] with respect to mitigation of visual and experiential effects and in the Outline Public Rights of Way and Permissive Paths Management Plan [REP1-104] with respect to effects on the physical usability of PROWs. These are secured by Requirements 7 and 16 respectively in Schedule 2 to the Draft DCO [REP3-005]. The Applicant is able to commit to improvements and/or enhancements to PRow within the Order Limits where these would help to mitigate or offset adverse effects as a result of the Scheme. A financial contribution to PRow network maintenance and upgrades beyond this would need to be agreed through the Community Benefit Fund which operates and is to be agreed outside of the DCO process.
KL-003	██████ also runs pottery and workshops, and the flying Monk Arts Trail for 10 years, with over 20	The Applicant notes this comment and refers to SE1.3 in the Applicant's Response to the Examining Authority's First

Reference	Comments/Issue raised	Applicant's Response
	venues. The trail has a huge following, bringing money to spend for other local businesses.	Written Questions [REP3-128] for impacts to tourism and recreation.
KL-004	████████ further notes that leisure and tourism is worth roughly £1.5 billion annually in Wiltshire, and over 28,000 jobs related to the industry. The proposed development will result in less tourists, less revenue to businesses, and job losses. The industrial park will negatively alter the area.	The Applicant notes this comment and refers to SE1.3 in the Applicant's Response to the Examining Authority's First Written Questions [REP3-128] for impacts to tourism and recreation.

2.9 Piers Dibben

Reference	Comments/Issue raised	Applicant's Response
PD-001	██████ introduced ██████ as a local resident and keen cyclist. ██████ has commuted over 25,000 miles on the roads to and from work over the last 20 years around the proposed site. ██████ also cycles at weekends and remembers one frightening experience with a car. ██████ can count the number of lorries ██████ has encountered on two hands, and that is why the roads are popular with cyclists. There are only tractors, farm machinery and local refuse lorries, with are part of rural life and an infrequent traffic mix. ██████ noted that there is a thriving cycling community, with clubs such as Grittleton Road Racers, Sherston Velo, Malmesbury Cycling Club, which all have training rides, events. They support the economy and cafes in the area and construction would introduce a level of heavy goods vehicle traffic that would pose safety concerns to cyclists. There are no pavements no cycling lanes, blind bends, and little opportunity to pass safely. ██████ noted that it is not an argument against development, but a plea to recognise that the roads have evolved as quiet rural lanes shared by	The Applicant confirms that impacts to PRow, unsurfaced roads, and the recreational use of the highway network have been assessed in ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068] and the supporting ES Volume 3 Appendix 16-2 Tourism and Recreation Receptor Tables [APP-241]. Consideration of the likely impact on views, character and the desirability of these routes to users has been fundamental to the assessment of likely significant effects. The Applicant also seeks to highlight that during the operational lifetime of the Scheme, permissive paths, including those for equestrians and cyclists, are proposed across the Solar PV Sites to improve accessibility and connectivity across the PRow network. These are shown on ES Volume 2, Figures 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plans [REP1-029, REP1-030, REP1-032 and REP3-037] and secured through the Outline LEMP [REP3-100]. This is secured through the detailed design stage by Requirements 5 and 7 in Schedule 2 to the Draft DCO [REP3-005]. See response to TT1.18 in The Applicant's Response to the Examining Authority's First Written Questions [REP3-128]. This sets out how the likely effects of the scheme in relation to Non-Motorised Users has been assessed and supports the conclusion of no significant effects presented in ES Volume 1,

Reference	Comments/Issue raised	Applicant's Response
	cyclists, walkers, horse riders, local residents, and agricultural traffic, not for sustained construction traffic. ■ asks the ExA to give careful consideration on impact to cyclist safety, local community and rural businesses.	Chapter 13 Transport and Access [REP3-065] . It also sets out how specific mitigation and measures within the Outline CTMP [REP3-108] will take account of Non-motorised Users.
PD-002	The ExA asked what the flying monk is, as they have heard it a number of times. The monk is an old abbey where monks were based. It is recognised as a significant landmark, and rural businesses grow around it.	The Flying Monk is a café and taproom that is located in an early 19th century Grade II Listed barn located to the east of Bradfield Manor Farmhouse (NHLE 1356036). The Applicant understands the name of the business is derived from a local craft ale, which is brewed in Malmesbury and inspired by the "Flying Monk" Eilmer of Malmesbury, who according to legend crafted wings out of wood and canvas and attempted to fly from the roof of Malmesbury Abbey in the 11th Century. The Applicant assumes that "The Monk" referred to by Mr Dibben is "The Monk Abbey", which is an informal name for the Priory of St Mary Magdalene in Monkton Farleigh. Whilst assessment of individual businesses such as the Flying Monk Café & Tap has not been undertaken, the economic impacts to tourism and visitor-dependent industries within the Study Area have been assessed in ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068] which finds no greater than a 0.7% impact on the tourism-dependent economy within the 5 km Study Area. The Applicant therefore does not consider this to be a significant effect to this industry.

2.10 Dermot Farrington

Reference	Comments/Issue raised	Applicant's Response
DF-001	██████████ from West Park Farm believes the application is flawed. █████ queried where the equine experts are and how only now is the applicant asking for information on how the proposed development may financially impact █████ business. There was no mention on health and safety risks to horses or people. █████ believes the impact on a thoroughbred is high given the proposed development is next to the stud farm, it will put the horses at serious risk.	The Applicant notes this comment and refers to SE1.9 in the Applicant's Response to the Examining Authority's First Written Questions [REP3-128] for impacts to equine health. The Applicant also confirms that a report on the financial impacts to equine businesses will be submitted at Deadline 5. The Applicant acknowledges the concerns raised regarding potential risks to horses and people associated with the proposed BESS. However, a thermal runaway event is considered to be a low-likelihood occurrence due to the multiple layers of prevention, monitoring and protection that would be incorporated into the BESS design, as secured through the Outline BSMP [REP3-106]. Notwithstanding this, a precautionary assessment of emissions from a potential BESS fire has been undertaken (ES Volume 3 Appendix 15-2 BESS Fire Emissions Modelling [REP2-013]). The assessment considered worst-case receptor locations and demonstrated that predicted pollutant concentrations would remain below relevant health-based thresholds at all assessed receptors. The receptors assessed include nearby residential properties, farm buildings and public rights of way, representing the locations of greatest potential exposure for both people and animals. The results are therefore considered representative of potential exposure to horses associated with nearby farms and equine businesses, and significant adverse health effects are not expected.

Reference	Comments/Issue raised	Applicant's Response
DF-002	■ was upset at the trespass onto his land, leaving a noise monitor in a dangerous place nowhere near the possible site, the reports should be done again. ■ further notes that two weeks ago for a second time, two people trespassed onto the farm at the lower end of Gauze Brook, at the opposite end of the site, surveying flood possibilities mid-summer. ■ queried why they were not conducted in the winter and that they have turned up to properties uninvited. ■ queried whether they are turning up at the correct locations, as ■ had to show them the correct site location. ■ queried trusting them as they didn't care about trespass law.	The Applicant confirms that noise monitoring at this location is not required to be repeated and acknowledges the misplacement of this meter in October 2023. Permission was sought and granted for all sound monitoring locations, however, in this instance the meter was accidentally attached to the wrong boundary fence as a result of human error. Regarding the recent incident cited, following an investigation, the Applicant has apologised to the respondent for the unauthorised access across their land. The Applicant has also apologised for the delay in confirming this with the respondent while enquiries were being made. Please refer to JF-010 to JF-012 of the Applicant's Response to Deadline 3 Submissions [EN010168/EXAM/9.46] for a detailed response to the incident cited. In relation to flood risk, the Gauze Brook survey work was undertaken to inform the hydraulic modelling and flood risk assessment. Such survey work is principally concerned with recording physical channel information, including channel geometry, bank levels, structure levels and local topography. It is not dependent on the survey being undertaken during a winter flood event. The hydraulic modelling assesses design flood events using surveyed channel data, LiDAR, topographic information and relevant

Reference	Comments/Issue raised	Applicant's Response
		hydrological inputs. The water level or flow condition present on the day of survey is therefore not the basis for the modelled flood levels. The Applicant does not agree that the flood risk assessment should be repeated because the Gauze Brook survey work was undertaken outside winter. Any site access concern does not alter the technical purpose of the survey data or the validity of using surveyed channel information to inform the flood risk assessment.
DF-003	██████████ noted that he received a questionnaire asking for financial details of ██████████ business which was intimidating, stressful and intrusive. ██████████ was upset that the applicant had years to send this to ██████████ but demanded a return within 5 days. ██████████ business is over 30 years old and forms ██████████ livelihood. ██████████ further noted to look at the Moriarty Tribunal in Ireland to see the relationship between Lime Down and the individuals.	In compiling a Farming and Food Security Technical Note for Deadline 4 [EN010168/EXAM/9.43], information on the impact of the loss of farmable area on each of the holdings affected was sought. The Applicant confirms that no financial details or sensitive information was requested. The Moriarty Tribunal was a 1997 Irish inquiry relating to tax evasion by politicians and business people. The Applicant is unclear as to the relevance of this in this instance.
DF-004	The ExA explained that following receipt of ██████████ ██████████ representations, they visited the property and saw some of the workings of the stud farm. They requested an explanation of the day-to-day practicalities on the farm, the handling, how the business operates. So the ExA can better identify the potential impacts	The Applicant notes this comment, and will respond to the further submissions provided at Deadline 5.

Reference	Comments/Issue raised	Applicant's Response
	and effects on the business. submission, put more detail about how business operates.	

2.11 Caroline Moore

Reference	Comment /Issue raised	Applicant's Response
CM-001	██████ explained that as you approach junction 17 on the M4, there is a sign for the River Avon and it led through unspoiled South Cotswold countryside to Sherston where ██████ lives. The only interruption is the Kingfishers, ducks, moor hens, herons, egrets, bats, muntjac, stoats, water voles and otters. It has a large biodiversity. ██████ further noted that it changed in March 2024 when the Lime Down flyer was received. The SLD committee helped get her and others up to speed on the issues and it affected her mental health. She spent 3.5 years of her ██████ living beside an enormous construction site, watching the landscape being destroyed would be devastating to her mental health. ██████ has since had to leave because of that.	The Applicant has directly assessed the impacts on community culture and identity as an indicator for mental health and wellbeing, as a result of changes to the visual rural character of the affected communities, and the extent to which these communities connect to their surroundings, sense of place, and each other. The assessment also considers community resilience and influence on their surroundings in parallel, based on understanding how mental wellbeing is tied to the quality and quantity of engagement and influence in changes to the built and natural environment around them. The assessment in ES Volume 1, Chapter 18: Human Health [APP-070] finds no greater than a long-term minor adverse effect to community culture and identity, or to community resilience and influence, which are therefore not considered significant effects. During non-statutory consultation in September 2024, the Applicant reached out by direct email contact to NHS Bath and North East Somerset, Swindon and Wiltshire Integrated Care Board, Royal United Hospitals Bath NHS Foundation Trust, and South Western Ambulance Service NHS Foundation Trust as the designated NHS service providers known to operate over northwest Wiltshire. As stated in ES Volume 3, Appendix 18-1: Matters Relevant to Human Health Raised Through Consultation [APP-244], no response was received by the Applicant team directly, nor through the non-statutory consultation process. During statutory

Reference	Comment /Issue raised	Applicant's Response
		consultation, the same providers, as well as NHS Bristol, North Somerset and South Gloucestershire Integrated Care Board, Great Western Hospitals NHS Foundation Trust, North Bristol NHS Trust, Wiltshire Heath and Care NHS partnership, Avon and Wiltshire Mental Health Partnership NHS Trust, and NHS England were contacted as Section 42 prescribed consultees and statutory undertakers relevant to health. This is demonstrated in Consultation Report Appendix G-1: Statutory Consultation under Section 42 of the Planning Act 2008 [APP-041] . No responses were recorded by any of these contacted prescribed consultees and statutory undertakers and as such they are not featured in Consultation Report Appendix G-5: Section 42 Applicant Response Tables [APP-045] . This absence of interaction from service providers indicated to the Applicant that said service providers were not specifically concerned with the Scheme having an impact on their ability to deliver their services to the affected population. As such, the Applicant focussed on discussing an appropriate approach with Wiltshire Council's Public Health Team.
CM-002	█ noted that renewable energy is needed to tackle climate change, but to focus on solar panels on supermarkets, on homes, car parks. The owners IGP are owned by a worldwide infrastructure assets group in excess of \$200	The Applicant agrees that renewable energy is vital for tackling climate change and supports the deployment of solar on rooftops, supermarkets, and car parks as a valuable contribution to the national energy mix. However, as set out in the Statement of Need [REP1-085] in accordance with National Policy Statement EN-1, the Government maintains that decentralised and community energy systems will not replace the urgent need for new large-

Reference	Comment /Issue raised	Applicant's Response
	billion, which cannot compete with volunteer groups relying on donated time.	scale electricity infrastructure to meet national energy objectives. Relying solely on rooftop solar would require a rollout rate at least six times faster than current levels to meet the UK's 2035 targets, a pace that is not considered feasible or likely in isolation. Large-scale ground-mounted schemes like Lime Down are essential because they provide bulk generation and the efficient transfer of power to the national grid at a significantly lower cost per unit than smaller, distributed installations. The Applicant clarifies that its parent company, Island Green Power, is owned by three investment funds managed by Macquarie Asset Management, which has a proven record of long-term stewardship in the UK, having invested over £65 billion in national infrastructure since 1999. While the Applicant acknowledges the disparity in resources compared to volunteer community groups, it maintains that access to extensive professional expertise is vital to ensure the Scheme is fully assessed, well-designed and compliant with national policy.
CM-003	████████ further noted that there are serious concerns about the impact on the historical setting of Malmesbury, the flood risk affecting local communities and potential consequences of fires involving the Bess, which has received scant attention. ██████ queried what the benefits would be to locals, the area is already rich in biodiversity, solar panels may be obsolete before the project is	Annex 1 of ES Volume 3, Appendix 12-1: Heritage Statement [APP-219] details assets scoped in for assessment and was used during consultation with Historic England and Wiltshire Council. Scoped in assets are considered to be agreed with both stakeholders. While it is noted that Malmesbury Abbey and Conservation Area are located on a prominent position and are visible within the wider landscape. There is no relationship with

Reference	Comment /Issue raised	Applicant's Response
	complete given the advance in technology, is it then worth it to ruin England's finest countryside. Once they are gone, they are gone, who will put it back.	land within the Scheme and the assets and consequently they were scoped out of the assessment In terms of biodiversity, the Scheme is expected to deliver an overall net gain for biodiversity as a result of the cessation of agricultural practices combined with delivery of considerable habitat creation and enhancement measures. This is quantified through the use of the DEFRA published Statutory Biodiversity Metric [REP3-087] with further details provided with the Biodiversity Net Gain Assessment Report [REP3-085] which demonstrates in excess of 10% BNG will result from the Scheme.

2.12 Gerald Joynson

Reference	Comments/Issue raised	Applicant's Response
GJ-001	██████████ as a resident of Sherston, making a representation by The Angel in Sherston, a coffee house with rooms. and food. ██████ notes that it is a major hub in the area, providing hospitality and a meeting place for residents and those from surrounding areas. A material part of their revenue is from cyclists and walkers who are drawn by the beauty of the area, without which The Angel would become uneconomic and would close. ████ further notes that there is an expectation that there will be a material decrease in the cyclists and walkers, and The Angel believes that they will have to close.	The Applicant notes this comment and refers to SE1.3 in the Applicant's Response to the Examining Authority's First Written Questions [REP3-128] for impacts to tourism and recreation. The Applicant confirms that impacts to tourism and visitors on the Sherston Conservation Area (within which The Angel can be found) has been assessed in ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241] which finds no greater than a minor adverse effect at any phase of the Scheme. This is not a significant effect. The Applicant also seeks to highlight that during the operational lifetime of the Scheme, permissive paths, including those for equestrians and cyclists, are proposed across the Solar PV Sites to improve accessibility and connectivity across the PROW network. These are shown on ES Volume 2, Figures 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plans [REP1-029, REP1-030, REP1-032 and REP3-037]. This is secured through the detailed design stage by Requirements 5 and 7 in Schedule 2 to the Draft DCO [REP3-005].
GJ-002	██████████ notes that there is scepticism of the amount of money the applicant has which will be needed in 60 years' time to return the land to its current state. ██████ queried where the fund is coming	The Applicant confirms that a requirement to decommission the Scheme is set out in Requirement 20 of the Draft DCO [REP3-005]; failing to comply with that requirement would be a criminal offence. The requirement to decommission the Scheme would sit

Reference	Comments/Issue raised	Applicant's Response
	from, whether there is capital sum set aside today, or from an investment fund, or inflation linked bonds? Additionally, where will the assets sit. ■■■ hopes it isn't IGP or Macquarie.	with the owner at the time of decommissioning. Decommissioning is also covered in agreements with landowners, which includes decommissioning securities to cover the cost of decommissioning in the event of any breach by the Applicant or in the event of the insolvency of the Applicant. The amount of such decommissioning security is regularly re valued throughout the lifecycle of the Scheme and topped up if necessary. Furthermore, the Applicant confirms that the Funding Statement [APP-019] submitted with the DCO application demonstrates that the Scheme is financially viable and adequately funded to be delivered in its entirety, including decommissioning and approximates the total cost to be £900 million to £950 million.
GJ-003	Additionally, ■■■ queries what the new government ■■■ will do in the energy sector and whether it may lead to nationalisation and what this will mean.	The Applicant notes the comment, however notes that government policy relating to the energy sector is set out in the designated energy National Policy Statements.

2.13 Mike Hinwood

Reference	Comments/Issue raised	Applicant's Response
MH-001	██████ introduced ██████, taking over from ██████ parents who started the business in 1948. ██████ noted that most customers are local and travel by car, but some cycle and walk enjoying the quiet Foxley Road. Some customers are from Reading and Bristol. If Lime Down goes ahead, he believes that many customers will be deterred from using what will become an extremely busy minor road, and many of the older customers will be intimidated from travelling down the narrow country roads and meeting heavy construction traffic. This will have an impact on the viability of his business. ██████ notes that the closure of Foxley Road in 2019 for several months had a major impact on his business throughout the construction phase and after., which affected trade for many months afterwards.	The Applicant has responded in full to written representations by Foxley Road Nurseries in the Applicant's Response to Written Representations [REP2-039] (pg.929-940). The Applicant has sought to ensure that the measures set out in the Outline CTMP [REP3-108], as secured by Requirement 15 in Schedule 2 of the Draft DCO [REP3-005], are sufficient to ensure no significant adverse effects to driver delay from HGV movements from the Scheme are anticipated during construction. For example, customers and staff of Foxley Road Nurseries would not be materially affected, as unrestricted access from the A429 to the east would remain available throughout the construction period. Furthermore, the section of Foxley Road on which the nursery is located does not form part of the proposed construction traffic route. See response to TT1.18 in The Applicant's Response to the Examining Authority's First Written Questions [REP3-128]. This sets out how the likely effects of the scheme in relation to Non-Motorised Users has been assessed and supports the conclusion of no significant effects presented in ES Volume 1, Chapter 13 Transport and Access [REP3-065].

Reference	Comments/Issue raised	Applicant's Response
		It also sets out how specific mitigation and measures within the Outline CTMP [REP3-108] will take account of Non-motorised Users.
MH-002	■ further explains the diverse range of plants grown at the nursery, which attract a rich variety of wildlife, including owls, bats, voles and pollinating insects. Customers comment that it is peaceful and come in to enjoy the tranquillity, it's a key part of the business ethos. This is compared with Lime Down which will destroy the local countryside, damage the mental wellbeing of locals, impacting viability of local businesses, all in pursuit of profit for shareholders that have interest in the local area.	Potential impacts on ecology and biodiversity, including species such as birds (including owls), bats, water voles, and invertebrates, are fully assessed in ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]. This assessment considers baseline ecological conditions and evaluates likely significant effects arising during the construction, operation and decommissioning phases of the Scheme. It identifies avoidance, mitigation and enhancement measures to address potential impacts on habitats and protected and notable species. It also identifies opportunities for ecological enhancement, including the creation and long-term management of habitats, and delivery of biodiversity net gain. The assessment concludes that no significant adverse effects on ecology and biodiversity are anticipated during construction or operation, with the exception of skylark and hedgerows. Residual significant adverse effects on these receptors are anticipated at a local-level of geographical importance only. Given that the nursery is located wholly outside of the Order Limits, no direct impacts to the ecological value of the nursery and its grounds are anticipated. Potential adverse effects of the Scheme on ecology and biodiversity are not anticipated to extend beyond the Order Limits, and proposed habitat creation and enhancement measures have been designed to maintain ecological integrity at

Reference	Comments/Issue raised	Applicant's Response
		the Solar PV Sites and strengthen existing ecological networks. Habitat creation, enhancement and management measures are set out within the Outline LEMP [REP3-100] and secured through DCO Requirements.

2.14 Geoffrey Philipps

Reference	Comments/Issue raised	Applicant's Response
GP-001	██████ introduced ██████ as a local resident who lives on Mill Lane, Corston, ██████ and spends a lot of time in ██████ garden which has a 300metre frontage to the Gauze Brook and bridleway MALW 51. ██████ referenced Storm Bert in November 2024 which caused the Brook to flood 17 times that winter, with the increased runoff identified by Professor Skeffington which will increase the speed at which waters rise. This means that A429 bridge gets more easily overwhelmed, raising the flood level and increasing risk to Corston Residents. This would render stillborn and thoughts on flood alleviation by the local Council should Lime Down go ahead.	The Applicant notes Mr Philipps' comments regarding existing flooding from the Gauze Brook at Corston, including the flooding experienced during and after Storm Bert. The Applicant does not dispute that Gauze Brook is an existing source of flood risk during high flow conditions. The relevant question for the DCO is whether the Scheme would materially increase flood risk to Corston or worsen flooding at existing downstream structures, including the A429 bridge. The Applicant does not agree that the Scheme would increase runoff in a way that would cause Gauze Brook to rise more quickly, increase flood levels at Corston, or undermine potential future flood alleviation measures. The flood risk assessment for Lime Down D has been informed by hydraulic modelling of Gauze Brook. The submitted assessment does not identify a material increase in flood risk to Corston as a result of the Scheme. Solar PV panels would be elevated above ground and would not operate as impermeable hardstanding or as a connected drainage catchment. Rainfall would continue to drain to ground beneath and between the panel rows. Formal impermeable infrastructure would be subject to controlled drainage, attenuation and discharge controls

Reference	Comments/Issue raised	Applicant's Response
		through the relevant FRA and Drainage Strategy and the detailed drainage design secured under Requirement 11: Surface Water Drainage of the Draft DCO [REP3-005]. Construction phase runoff, sediment mobilisation and soil compaction risks would be managed through the Outline CEMP [REP3-092] and Outline Soil Resources Management Plan [REP3-098]. On this basis, the Applicant does not agree that the Scheme would materially increase flood risk to Corston or make flooding at the A429 bridge more severe.
GP-002	There are on average 20 to 30 groups passing by the garden daily and perhaps 100 on a summer's weekend, with families, dog walkers, cyclists, hikers and horse riders. The footpath is set to close, eroding the main benefit of MALW 51 and cutting off 45-minute circular routes to Mill Lane.	MALW 51 will remain open throughout the lifetime of the Scheme and will connect to HULL7 to the west. Maintenance of the PROW surface, furniture and waymarking within land under freehold acquisition by the Applicant is their responsibility to maintain, and is secured through the Outline Public Rights of Way and Permissive Paths Management Plan [REP1-104] by Requirement 16 in Schedule 2 to the Draft DCO [REP3-005] .
GP-003	Additionally, [REDACTED] noted that large sections of the footpath will have a 2.5-metre-high deer fencing when the Forestry Commission only recommends 1.5 metre high for indigenous deer species in this part of the country. [REDACTED] believes it will feel like Alcatraz. Creating and maintaining a	As set out within Design Principles and Parameters [REP3-083] , the Applicant confirms that 2.5-metre high deer fencing is proposed by the Scheme. This is to control large mammalian movements, including deer, and provide a visual deterrent to entering the Solar PV Array areas, whilst maintaining a more open aspect for PROW users.

Reference	Comments/Issue raised	Applicant's Response
	4.5 metre hedge is challenging and expensive, and will take years to achieve, resulting in plants growing thin at the bottom. This is in addition to the constant hum of tracker panels destroying any sense of space or solitude. The project is ill conceived, badly designed, and wrongly located, all without any concern for local stakeholders.	The design of the scheme has embedded buffers into the proposed layout, specifically a 15m offset to any proposed infrastructure on either side of any PRoW. Where PRoW directly cross the array, this creates a corridor with a minimum width of 30m wide between proposed fencelines through the array. There would then be a gap of 4m between the fence line and the proposed panels resulting in a minimum total width of 38m between the panels where PRoW cross the arrays. The Outline LEMP [REP3-100] sets out the proposed ongoing General Management Prescriptions for all vegetation within the order Limits, including hedgerows. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, which would be required to be substantially in accordance with the Outline LEMP [REP3-100], is secured through Requirement 7 in Schedule 2 of the Draft DCO [REP3-005]. It should be noted that all existing hedgerows within the scheme will be strengthened whether they are required to provide mitigating screening or not. The proposed mitigation has been informed by both the management guidelines and Strategy Actions for LCA 8 - Hullavington Rolling Lowland in which all the Solar Sites are located (particularly to "<i>Conserve hedgerows and mature trees, including planting new trees in existing hedges and planting specimen trees in field corners</i>"), and Wiltshire's Nature Recovery Strategy which promotes the creation of new grassland and enhancement of existing hedgerows as priorities. On hedgerows (section12.16)

Reference	Comments/Issue raised	Applicant's Response
		Action HDW1g (page 113) states: <i>"Allow the hedge to grow out into the field, leaving a grassy margin managed as rough grassland. Allow the hedge to spread into margins, cutting back on rotation."</i> And HDW1h: <i>"Cut as infrequently as possible."</i> HDW2a: <i>"Plant new hedges with a diverse mix of native species."</i> Low hedgerows are a consequence of the localised management practices undertaken by landowners / managers. Mechanical flailing is fast and the most cost effective way to manage long stretches of boundaries. However not all hedgerows within the receiving landscape are cut low. Additionally low hedgerow and are not specifically mentioned as a key characteristic feature of the Hullavington Rolling Lowland Landscape Character Area. The condition of hedgerows is noted in the description of LCA 16A: Malmesbury-Corsham Limestone Lowlands which states <i>"the condition of Limestone Lowland Landscape type is generally good with intact hedgerows, traditional villages of vernacular stone dwellings, village greens and stone walls. In some sections of the areas there are elements in poorer condition such as gappy and flailed hedgerows, overgrown stone walls and encroaching horse pasture close to some of the larger settlement."</i> Its Strategy is <i>"to strengthen locally degraded elements such as the flailed hedgerows and overgrown stone walls."</i> The Wiltshire Recovery Strategy provides a framework to reverse biodiversity decline and build resilience across the county's landscapes and was developed under the Environment Act 2021. As

Reference	Comments/Issue raised	Applicant's Response
		noted above, Section 12.16 of the Nature Recovery Strategy promotes hedges to be grown out as high hedges provide diverse micro habitats and support small mammals and other wildlife. All new hedgerows, trees and woodland as well as enhancement of existing hedgerows will be undertaken using locally appropriate native species (including elm). Although hedgerows will be managed to 4.5m this is not seen by the Applicant as inappropriate as it is promoted by the Nature Recovery Strategy. However, it is recognised that 4.5m hedgerows will affect open views in some places and be incongruous to the current character of the receiving landscape. While there could be faint humming close to the infrastructure, this would, with reference to Chapter 14 Noise and Vibration [REP1-021], be below existing sound levels most of the time across much of the local area. Tracker panel systems are designed to rotate panels gradually to follow the path of the sun. Their movement is intermittent, slow and typically limited to daylight hours. Hedgerow management prescriptions set out within the Outline LEMP [REP3-100] have been proposed to ensure dense and bushy hedgerow structure is established and maintained, as it is acknowledged that a gappy structure can develop within taller or established hedgerows that are managed inappropriately. An appropriate rotational cutting regime is set out within the Outline LEMP [REP3-100] to ensure dense hedgerow structure is maintained across the Solar PV Sites for the lifespan of the Scheme,

Reference	Comments/Issue raised	Applicant's Response
		which is anticipated to deliver a structurally diverse hedgerow network. With regard to the Scheme's location, the Applicant has considered alternative locations for the Scheme within 25 km of the point of connection, as set out in the Site Selection Assessment Report [APP-185] and the Technical Note on Site Selection Assessment [REP2-043]. The conclusion of the Applicant's assessment is that there are no more suitable and available locations within the 25 km search area than the proposed location for the Scheme, based on the criteria identified. The Applicant considers its site selection assessment to be in line with NPS EN-1 (including but not limited to paragraphs 4.3.22 – 4.3.29), NPS EN-3 (including but not limited to paragraphs 2.10.18 – 2.10.34) and the requirements of Regulation 2 and paragraph 2 of Schedule 4 to the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017.
GP-004	ExA requested the Forestry commission document referencing deer fencing height to be submitted. ████████ confirmed.	The Applicant notes this comment.

2.15 Steve Harvey

Reference	Comments/Issue raised	Applicant's Response
SH-001	■■■■■ representing Sherston Velo Cycling Club, a local cycle club with over 70 active members. ■■■■ is an active, avid cyclist and ex-chair of the club, and has concerns on rider safety because of the project. ■■■■■ notes the benefits are companionship and safety, which is monitored constantly, and is the main factor when planning a club ride during the weekend and mid-week rides, which all start and finish in Sherston village. The ethos of the club to bring people together to enjoy sport promote fitness in safe environment is undermined. Lime Down will put the riders in jeopardy as there will be hoards of large vehicles in the area, the general traffic will increase, vortexes created by the large vehicles, which increases the chances of cycling accidents significantly.	The Applicant seeks to highlight that during the operational lifetime of the Scheme, permissive paths, including those for equestrians and cyclists, are proposed across the Solar PV Sites to improve accessibility and connectivity across the PROW network. These are shown on ES Volume 2, Figures 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plans [REP1-029, REP1-030, REP1-032 and REP3-037] and secured through the Outline LEMP [REP3-100]. This is secured through the detailed design stage by Requirements 5 and 7 in Schedule 2 to the Draft DCO [REP3-005]. In addition, see response to TT1.18 in The Applicant's Response to the Examining Authority's First Written Questions [REP3-128]. This sets out how the likely effects of the scheme in relation to Non-Motorised Users has been assessed and supports the conclusion of no significant effects presented in ES Volume 1, Chapter 13 Transport and Access (Rev3) [REP3-065]. It also sets out how specific mitigation and measures within the Outline CTMP [REP3-108] will take account of Non-motorised Users.
SH-002	Fewer cyclists will pass because of this, and this will impact local small businesses such as Courtyard Café that rely on cyclists. ■■■■ noted that ■■■■ may have to commute with a car instead of a bike as a result, adding to the country's emission issues.	The Applicant notes this comment and refers to SE1.3 in the Applicant's Response to the Examining Authority's First Written Questions [REP3-128] for impacts to tourism and recreation The Applicant confirms that impacts to tourism and visitors on the Sherston Conservation Area (within which the Courtyard Café can be found) has been assessed in ES Volume 3, Appendix 16-2:

Reference	Comments/Issue raised	Applicant's Response
		Tourism and Recreation Receptor Tables [APP-241] which finds no greater than a minor adverse effect at any phase of the Scheme. This is not a significant effect. This assessment has furthermore assessed the likely impact on PROWs, promoted cycling routes, and the recreational use of the local highway network. Whilst a temporary significant residual effect has been identified to the Wiltshire Cycleway during construction, this effect is not present on the result of the local highway network, including on connections to Sherston. In addition, see response to TT1.18 in The Applicant's Response to the Examining Authority's First Written Questions [REP3-128]. This sets out how the likely effects of the scheme in relation to Non-Motorised Users has been assessed and supports the conclusion of no significant effects presented in ES Volume 1, Chapter 13 Transport and Access (Rev3) [REP3-065]. It also sets out how specific mitigation and measures within the Outline CTMP [REP3-108] will take account of Non-motorised Users.
SH-003	The ExA asked how popular the cycle routes are and what typical cycle routes they go [REDACTED] [REDACTED] responded that they are advertised on Strava before, with around 20 odd riders in a typical group, split out in smaller groups of 6 with intervalled start times. [REDACTED] confirmed that [REDACTED] can provide typical routes to the ExA.	The Applicant makes note of this comment. Specific mitigation and measures are set out within Chapter 6 of the Outline CTMP [REP3-108] to take account of Non-motorised Users, including cyclists. As set out within Section 6.6 of the Outline CEMP [REP3-092] the core construction working hours (excluding start-up and shut down works) are defined as: Monday to Friday from 07:00 to 18:00 (daylight hours permitting);

Reference	Comments/Issue raised	Applicant's Response
		• Saturday from 08:00 to 13:30 (daylight hours permitting); and • No Sunday or Bank Holiday working unless crucial to construction (for example for Horizontal Direction Drilling (HDD) which must be a continuous activity) or in an emergency. Where practicable, construction deliveries would be coordinated to avoid HGV movements during the traditional network peak morning (08:00 to 09:00) and peak afternoon (17:00 to 18:00) hours. In addition, construction worker shift patterns will be coordinated to avoid travel during the network peak hours of 08:00-09:00 and 17:00-18:00. Therefore, construction traffic, particularly HGV traffic, is likely to avoid impacting upon early morning or evening cycling, or on most weekend cycling.

2.16 Aileen Hood

Reference	Comments/Issue raised	Applicant's Response
AH-001	██████████ and lives in Malmesbury. ██████ feels that the land is farmland and should be used to grow crops, even if it's not the very best farmland. ██████ references that the UK only produces 54% of its food, and that in an increasingly unstable world, we should not be importing nearly half of our food, which increases our reliance on fossil fuels for transport. ██████████ noted that it does not make sense to reduce the land available for growing food to produce electricity when there are acres of rooftop space that cannot grow food but could be used for solar panels. ██████████ queried that there are other ways to create renewable electricity that do not take large areas of farmland out of production for generations. Sheep can graze the land where solar panels are, but we are told to eat more plant-based diets, so having more farm animals also does not make sense to ██████	The Applicant submitted a Farming and Food Security Technical Note [EN010168/EXAM/9.43] at Deadline 4 that addresses each of these concerns and highlights a number of factors beyond agricultural land quality that affect food production. Approximately two-thirds of the agricultural land within the Solar PV Sites is moderate to poor quality in Subgrade 3b or Grade 4, as detailed in ES Volume 3, Appendix 17-1: Agricultural Land Classification and Soil Resource Survey Report [REP3-067]. The Applicant acknowledges that although relatively low grade, the land is primarily in arable production and used to grow crops. However, as set out in the Farming and Food Security Technical Note [EN010168/EXAM/9.43], around 85% of the UK's utilised agricultural land is used for livestock or for growing feed for livestock, and is not for human consumption. Changing the use of the land within the Solar PV Sites from arable production to energy production will not make a significant contribution to UK food (in)security. In terms of rooftop solar, the Applicant supports the development of rooftop solar alongside, but not instead of, large-scale ground mount solar schemes. This is aligned with the Government's position as set out in NPS EN-1 (2023) Paragraph 3.3.12. Section 6.3 of the Statement of Need [REP1-085] explains that the bulk generation potential of large-scale schemes and their connection

Reference	Comments/Issue raised	Applicant's Response
		to the National Electricity Transmission System enables their benefits to be felt more widely, which is a key benefit of the scheme.
AH-002	██████ noted that the land could revert to farmland in 60 years, but we won't know the impact of the solar panels on the land until then because we have not done it before.	SOI-3 The Applicant notes the concern raised about the impact of solar panels on the land, however, disputes the claim that the impacts will be unknown. Extensive assessment work has informed the Environmental Statement (originally [APP-052 to APP-265], see the latest Guide to the Application for updates to documents throughout Examination [REP3-003 at the time of writing]). Notably ES Volume 1, Chapter 17: Soils and Agriculture [REP3-021] concludes that at decommissioning there is expected to be a temporary moderate (significant) beneficial effect on soil resources due to the improvement of soil health, quality and structure through being undisturbed for 60 years. Moreover, the Outline Soil Resources Management Plan [REP3-098] stipulates that soil inspections must be undertaken at decommissioning to ensure there are no residual adverse effects on the soil resources.
AH-003	██████ noted that █████ is not an expert but understands that the Grid cannot cope with any more large solar generating stations and that some large projects are sitting unconnected. █████ feels that any further permissions should not be granted until the grid is properly ready. █████ queried whether the battery storage should be	The Applicant has accepted a connection offer to the National Electricity Transmission System (NETS) at National Grid's existing Melksham 400kV substation. As part of the National Energy System Operator's (NESO) connection reform activities, the solar element of the Scheme has been re-prioritised as Gate 2 Phase 1 (in 2030 or earlier). The BESS element of the Scheme has been re-prioritised as Gate 1 (as yet unconfirmed indicative connection date).

Reference	Comments/Issue raised	Applicant's Response
	owned and supported within the grid, rather than the individual generating stations.	The Applicant knows of no specific impediments to connection, or the timing of delivery / completion of the Scheme. Necessary energy market consents and licences have either been secured or will be secured at the appropriate point in project development. Indeed, NESO's re-prioritisation of the Scheme as a Gate 2 Phase 1 (highest priority) scheme supports the Applicant's position that the Scheme can be accommodated onto the NETS at the proposed Point of Connection. Section 7.4 of the Statement of Need [REP1-085] sets out the suitability of National Grid's Melksham substation and the surrounding NETS for connection of the Scheme to the grid. The key points are: • The transmission grid around Melksham provides sufficient capacity to flow power and provides defence-in-depth for system security. • Significant network constraints are not foreseen during normal conditions. The BESS proposed as associated development to the Scheme provides additional support to the operation of the solar if any significant network constraints did occur • The Scheme will be able to displace more expensive and carbon intensive power generated in southern England, to the benefit of electricity system decarbonisation and consumer cost nationally Paragraph 3.2.3 of NPS EN-1 (2023) explains that <i>"It is for industry to propose new energy infrastructure projects that they assess to be viable within the strategic framework set by government. This is the</i>

Reference	Comments/Issue raised	Applicant's Response
		<i>nature of a market-based energy system</i> " and it is in that context that the Applicant is bringing forward the Scheme as proposed.

2.17 John Matthews

Reference	Comments/Issue raised	Applicant's Response
JM-001	██████████ has a family and has lived and farmed near Sherston since 1978. █████ is vehemently opposed to the Lime Down scheme and noted █████ has had for 13 years, ground mounted PV rays which feed directly into the Grid, which is discreetly sited. █████ stated this as █████ is a supporter of solar panels and renewable energy, but not in the scale proposed. █████ noted that he was an ex-board member of the Cotswolds Area of Outstanding Natural Beauty. █████ is shocked that the panels shown in the original submission were immediately adjacent to the National Landscape's boundary, and since have been removed. He still suspects that the landscape is in jeopardy and urges the ExA to investigate and protect this.	The Applicant notes this comment and directs to their response provided at RS-002 above.
JM-002	██████████ noted that there were many surveys which were covert, done on the rights of way within the scheme. █████ understands that they are well used and appreciated by both locals and visitors and have a huge historical significance. Their character will be fundamentally changed by the scheme.	The Applicant undertook NMU surveys on the public highway in May 2026. These were licenced by Wiltshire Council. Unfortunately, some of the equipment was vandalised and stolen. The surveys will therefore be undertaken again at the request of the Examining Authority. ES Volume 1, Chapter 12: Cultural Heritage [REP3-017], supported by appendices in Volume 3 (12-1 to 12-7) [APP-219 to

Reference	Comments/Issue raised	Applicant's Response
	The path with high fencing and panels beyond as a view, with electric hum is not going to give any user peace, pleasure or a feeling of wellbeing in the countryside. ■■■ believes we must not lose these valuable assets; the scheme will damage the landscape for generations if not forever, and will threaten livelihoods and harm local communities. ■■■ urges the planning inspectorate to refuse the DCO.	APP-232] has assessed the potential impact of the scheme on heritage assets. In terms of the points raised on landscape, ES Volume 1, Chapter 8 Landscape and Visual [REP3-025] fully acknowledges that the character of the Site itself, and its immediate surroundings would be Significantly Adversely affected as a consequence of the Development, with the land now presenting as a large scale solar scheme. However, NPS EN-1 recognises at para 5.10.5 that <i>“Virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape, but there may also be beneficial landscape character impacts arising from mitigation.”</i> ES Volume 1, Chapter 8 Landscape and Visual [REP3-025] recognises the change to the visual amenity and associated adverse effects to users of those PRow that are located within the array itself or directly adjacent. The design of the scheme has embedded buffers into the proposed layout, specifically a 15m offset to any proposed infrastructure on either side of any PRow. Where PRow directly cross the array, this creates a corridor with a minimum width of 30m wide between proposed fencelines through the array. There would then be a gap of 4m between the fence line and the proposed panels resulting in a minimum total width of 38m between the panels where PRow cross the arrays. The Applicant confirms that the assessment in ES Volume 1, Chapter 18: Human Health [APP-070] considers the physical and mental health impacts of changes to recreation and countryside

Reference	Comments/Issue raised	Applicant's Response
		access under the assessment topic 'open space, leisure and play', and concludes that no significant adverse effects are anticipated at any phase of the Scheme. This has considered the impacts to PROW users with respect to changes to access to the PROW network and changes to the enjoyment and desirability of PROWs affected by the Scheme as assessed in ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241] .

2.18 Sarah Payne

Reference	Comments/Issue raised	Applicant's Response
SP-001	██████ introduced █████ and has a family that lived in Wiltshire for generations. █████ home is in Surrendell in Grittleton, where family enjoys dog walking, countryside way of life, cycling, running and horse riding. █████ is concerned of the effect of construction traffic and the HGVs which will make it unsafe to ride. █████ fears that her children will move away if the solar panels are erected, as the idyllic lifestyle will be gone.	See response to TT1.18 in The Applicant's Response to the Examining Authority's First Written Questions [REP3-128]. This sets out how the likely effects of the scheme in relation to Non-Motorised Users has been assessed and supports the conclusion of no significant effects presented in ES Volume 1, Chapter 13 Transport and Access (Rev3) [REP3-065]. It also sets out how specific mitigation and measures within the Outline CTMP [REP3-108] will take account of Non-motorised Users.
SP-002	████████████████████ ████████████████████ ████████████████████ but the daily works and fresh air and nature are more beneficial. █████ notes the chirping of finches, blue tits, and wrens in the trees and hedges, and the skylarks, which will be ruined by hearing inverters instead.	Potential impacts to breeding and wintering birds are assessed within ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]. The assessment concludes that no significant adverse effects on breeding and wintering birds are anticipated as a result of the Scheme, with the exception of ground-nesting birds of open habitats at the Solar PV Sites as a result of displacement. Residual significant adverse effects on these receptors are anticipated at a local-level of geographical importance only for skylark, and at site level for other ground-nesting bird species. These effects are transparently reported within ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]. Specific mitigation and habitat enhancement measures ground-nesting are incorporated into the Scheme design to reduce effects as far as practicable. These include the provision of suitably large, open set-aside and grassland habitats designed to provide appropriate

Reference	Comments/Issue raised	Applicant's Response
		breeding and foraging conditions. These measures are illustrated in ES Volume 2, Figure 3-4: Landscape and Ecological Mitigation Plan [REP1-029 to REP1-032] and detailed in the Outline LEMP [REP3-100]. In terms of noise, while noise from the Scheme will be audible at times, in particular when close to conversion units, the overall picture shows that levels will be similar to or below the existing ambient sound level in the area. Further details on the noise impact on public rights of way are provided in item NV1.9 of the Applicant's Response to the Examining Authority's First Written Questions [REP3-128]. The Applicant has directly assessed the impacts on physical and mental health as a result of changes to recreation and countryside access under the assessment topic 'open space, leisure and play', and on community culture and identity as an indicator for mental health and wellbeing, as a result of changes to the visual rural character of the affected communities, and the extent to which these communities connect to their surroundings, sense of place, and each other. The assessment also considers community resilience and influence on their surroundings in parallel, based on understanding how mental wellbeing is tied to the quality and quantity of engagement and influence in changes to the built and natural environment around them. The assessment in ES Volume 1, Chapter 18: Human Health [APP-070] finds no greater than a long-term minor adverse effect to open space, leisure and play, community

Reference	Comments/Issue raised	Applicant's Response
		culture and identity, or to community resilience and influence, which are therefore not considered significant effects.
SP-003	also notes the impact of the construction, maintenance and decommissioning of the project, and that the view from the neighbours farm will become unrecognisable if the projects gets permission.	The Applicant notes this comment.

2.19 Anna Layton

Reference	Comments/Issue raised	Applicant's Response
AL-001	██████████ as a resident that lived in the area for over 25 years. ██████ supports renewable energy but does not support the project because the large carbon footprint will likely produce more carbon than it saves well past 2050, when we are supposed to reach net zero. ██████████ notes independent reports produced by Derby and Exeter universities that appear to come to this conclusion. ██████ further queries how green the energy is, as chapter 3 of IGP's environmental statement, plate 3-3 showing tracker panels following the sun during the summer, but that there is no illustration for the winter.	The ES Volume 1, Chapter 7: Climate Change [APP-059] assessment concluded the project will save carbon emissions compared with the no project scenario. Regarding the carbon break even of the project please refer to note Climate Response to Wiltshire Council Appendix B of Written Rep and SLD Appendix J1 [REP3-132] section 5 (5.1 and 5.2). The Applicant explains that, although Plate 3-3 indicates a tracking path most likely during summer months, Single Axis Trackers (SATs) work in the same way throughout the year. In winter, the panels continue to follow the sun's lower path across the sky, rotating around their central axis to maximise exposure. At night, they return to a horizontal position at 2.5m. This capability allows the Scheme to the option of providing improved generation during shoulder hours and capture the maximum amount of renewable energy per panel.
AL-002	██████████ notes the height being 4.5 metres in the morning and 3.5 metres in the afternoon, which will be very visible in the daylight hours. Great Somerford and Rodbourne will be ruined by Lime Down, with wonderful views blocked by panels and fences for years to come. The peace, quiet and birdsong would be replaced by humming.	ES Volume 1 Chapter 8 Landscape and Visual [REP3-025] has been undertaken with consideration of the appropriate and relevant guidance and robustly assesses both the landscape and visual effects of the Scheme independently to ensure both the impacts and effects on the fabric and character of the landscape are taken into account as well as the views and visibility. The LVIA set out in ES Volume 1 Chapter 8 Landscape and Visual [REP3-025] acknowledges that as a consequence of the Development, there would be significant adverse effects to Landscape Character and

Reference	Comments/Issue raised	Applicant's Response
		visual amenity. However, NPS EN-1 recognises at para 5.10.5 that <i>"Virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape, but there may also be beneficial landscape character impacts arising from mitigation."</i> and at Para 5.10.13 that <i>"All proposed energy infrastructure is likely to have visual effects for many receptors around proposed sites."</i> In terms of noise, while there could be faint humming close to the infrastructure, this would, with reference to ES Volume 1 Chapter 14 Noise and Vibration [REP1-021], be below existing sound levels the vast majority of the time in Rodbourne and would not be audible in Great Somerford. If used, tracker panel systems are designed to rotate panels gradually to follow the path of the sun. Their movement is intermittent, slow and typically limited to daylight hours.
AL-003	■■■■ queries the impact of the Skylarks and Yellowhammers nesting sites, which may be decimated.	Potential impacts on ecology and biodiversity, including on breeding birds such as skylark and yellowhammer, are fully assessed in ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]. This assessment considers baseline ecological conditions and evaluates likely significant effects arising during the construction, operation and decommissioning phases of the Scheme. It identifies avoidance, mitigation and enhancement measures to address potential impacts on habitats and protected and notable species. It also identifies opportunities for ecological enhancement, including the creation and long-term management of habitats, and delivery of biodiversity net gain. The assessment concludes that no significant adverse effects on ecology and

Reference	Comments/Issue raised	Applicant's Response
		biodiversity are anticipated during construction or operation, with the exception of skylark and hedgerows. Residual significant adverse effects on these receptors are anticipated at a local-level of geographical importance only. No significant adverse effects on yellowhammer are anticipated. The assessment in ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015] identifies skylarks as a key species of conservation interest within the Scheme area. It concludes that approximately 71.5% of the quantified number of territories belonging to the current skylark population will be displaced from the Solar PV Sites. This is expected to give rise to an adverse residual effect at a Local level which is transparently reported. Skylark-specific mitigation and habitat enhancement measures are incorporated into the Scheme design to reduce effects as far as practicable. These include the provision of suitably large, open set-aside and grassland habitats designed to provide appropriate breeding and foraging conditions. These measures are illustrated in ES Volume 2, Figures 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plans [REP1-029, REP1-030, REP1-032 and REP3-037] and detailed in the Outline LEMP [REP3-100]. Appropriate mitigation measures to avoid and minimise potential impacts on nesting birds, including yellowhammer and skylark, are set out within the Outline Ecological Protection and Mitigation Strategy [REP3-102], and habitat creation, enhancement and management prescriptions, including for specific skylark mitigation

Reference	Comments/Issue raised	Applicant's Response
		habitat as above, are set out within the Outline LEMP [REP3-100] . These measures will be secured via DCO Requirements.
AL-004	██████████ horse at Hullavington and the peaceful areas will change enormously, with riding being dangerous during construction periods, as HGVs and horses not going well together	The Applicant notes this comment and refers to SE1.9 in the Applicant's Response to the Examining Authority's First Written Questions [REP3-128] for impacts to equine health. The Applicant also confirms that a report on the financial impacts to equine businesses will be submitted at Deadline 5. In addition, see response to TT1.18 in The Applicant's Response to the Examining Authority's First Written Questions [REP3-128]. This sets out how the likely effects of the scheme in relation to Non-Motorised Users has been assessed and supports the conclusion of no significant effects presented in ES Volume 1, Chapter 13 Transport and Access (Rev3) [REP3-065]. It also sets out how specific mitigation and measures within the Outline CTMP [REP3-108] will take account of Non-motorised Users.

2.20 Helen Worthey

Reference	Comments/Issue raised	Applicant's Response
HW-001	██████ introduced ██████ as a long-term resident of Malmesbury, working in the health and wellbeing sector, focusing on factors that enable people and communities to live healthier lives. ██████ established an integrated health and wellbeing centre in Malmesbury, and submits that with her experience and studies, that nature functions as preventative healthcare. ██████ noted the long-term impact on the health of children and young people in the nine villages surrounding the proposed development. ██████ estimates that there are 300 children in the local schools, over 60-year project lifetime that will be 20,000 young peoples' lives affected and associated cognitive development permanently altered during their formative years. There is scientific evidence that daily access to nature as green space is more than an environmental benefit, it is a public health asset. ██████ references ██████████ of Oxford who brought together decades of research showing it reduces cortisol, stress and anxiety. The physical activity	Impacts on health and wellbeing are assessed in ES Volume 1, Chapter 18: Human Health [APP-070]. This chapter provides a comprehensive assessment of the Scheme's potential effects on human health, including both physical and mental health and wellbeing, through consideration of a broad range of health determinants. These include access to open space and recreation and access to the countryside under the heading 'open space, leisure and play', impacts from 'noise and vibration', and impacts on connectivity and access to services as a result of 'transport modes, access, and connections'. With respect to open space, leisure and play, the Applicant has recognised that children are a sub-population group that are more vulnerable to changes in open space availability. The population of the 2 km Study Area around the Scheme currently have good levels of access to formal recreational facilities (such as sports pitches, clubs, and play areas) whilst there is an abundance of access to open space across much of the Study Area due to its rurality and density of PROW access. Therefore, in assessing the impact of the Scheme on access to open space, the Applicant does not consider the Scheme would disproportionately affect children (i.e due to loss of youth facilities or play areas), and it is anticipated that there would be no greater than a minor adverse effect to health at any phase of the Scheme. This is not significant.

Reference	Comments/Issue raised	Applicant's Response
	helps regulate blood pressure and heart rate, supporting lifelong physical and mental health. Everyday activities would be severely curtailed if Lime Down were to proceed, and children with mental health issues such as Aspergers and Autism, who are sensitive to noise, electromagnetic frequencies and changes to schedules will experience significant additional stress and harm. It may cause families to move away. [REDACTED] concludes by requesting that these health and wellbeing impacts are given substantial weight in the recommendation.	The Applicant agrees that children with forms of neurodivergence are likely to be of greater vulnerability to noise impacts and impacts to routines as a result of delay to transport modes. That notwithstanding, the assessment in ES Volume 1, Chapter 18: Human Health [APP-070] does not identify any population group that is likely to be disproportionately impacted by the Scheme with regard to noise and vibrations or transport modes, and as such, no significant adverse effects are predicted at any phase of the Scheme. The Applicant has not assessed impacts to health from electromagnetic fields as no significant adverse effects are likely to any group. Furthermore, people and children with autism, or related forms of neurodivergence are most likely to be of hyper-sensitivity to noise emitted by electrical devices¹, not electromagnetic fields. The Applicant is therefore confident that due weight has been given to children's health and wellbeing in the assessment of health and wellbeing in ES Volume 1, Chapter 18: Human Health [APP-070].
HW-002	The ExA requested [REDACTED] to submit the headline reports mentioned. [REDACTED] confirmed.	The Applicant notes this comment and will respond if required at Deadline 5.

¹ National Autistic Society (2026). Autism and sensory processing [online]. Available at www.autism.org.uk/advice-and-guidance/about-autism/sensory-processing

2.21 GDPR – LDSF - 025

Reference	Comments/Issue raised	Applicant's Response
GDPR-LDSF-001	Individual is not against solar panels and believes that renewable energy is important and has a role to play in reducing carbon emissions and helping the UK move towards a greener future. ████ noted that we need to think carefully about where these developments are built. █████ is █████, and recalled riding █████ bike and going on family walks, enjoying the freedom of open spaces. ████ concerned with the loss of productive farmland when food security is increasingly important. Solar panels could be better placed on warehouses, factories and rooftops so it does not take away good farmland. This also supports British farmers who are facing rising costs and other challenges.	Please refer to the Applicant's response above to AH-001 for detail on food security. The Farming and Food Security Technical Note [EN010168/EXAM/9.43] submitted at Deadline 4 comments on driving factors for land use decisions made by farmers facing rising costs and other challenges. With regard to the use of rooftops and instead of farmland, the Applicant supports the use of rooftops for solar but given the overwhelming need for renewable energy, this needed in addition to large scale solar projects such as the Scheme, rather than instead of it. The Applicant has sought to limit the use of best and most versatile farmland as set out in its Site Selection Assessment Report [APP-185]. Please see the Applicant's response to RS-003 above for more details.
GDPR-LDSF-002	████ further notes the importance of countryside on mental health and wellbeing. Once lost, these pleasures cannot be easily replaced.	The Applicant has directly assessed the impacts on physical and mental health as a result of changes to recreation and countryside access under the assessment topic 'open space, leisure and play'. The Applicant has also assessed community culture and identity as an indicator for mental health and wellbeing. This has been

Reference	Comments/Issue raised	Applicant's Response
		assessed through considering changes to the visual rural character of the affected communities, and the extent to which these communities connect to their surroundings, sense of place, and each other. The assessment in ES Volume 1, Chapter 18: Human Health [APP-070] finds no greater than a long-term minor adverse effect to open space, leisure and play, or to community culture and identity, which are therefore not considered significant effects.
GDPR-LDSF-003	■ noted concern over the impact of construction on the local people, with HGVs and construction traffic on narrow country lanes where ■ still cycles.	See response to TT1.18 in The Applicant's Response to the Examining Authority's First Written Questions [REP3-128] . This sets out how the likely effects of the scheme in relation to Non-Motorised Users (including cyclists) has been assessed and supports the conclusion of no significant effects presented in ES Volume 1, Chapter 13 Transport and Access (Rev3) [REP3-065] . It also sets out how specific mitigation and measures within the Outline CTMP [REP3-108] will take account of Non-motorised Users.
GDPR-LDSF-004	The countryside would begin to feel like an industrial estate rather than a beautiful landscape, and the length of the project means that ■ will be retired when the land returns to its current state, so it will be for ■ entire lifetime.	ES Volume 1, Chapter 8 Landscape and visual [REP3-025] fully acknowledges that the character of the Site itself, and its immediate surroundings would be Significantly Adversely affected as a consequence of the Development, with the land now presenting as a large scale solar scheme. However, NPS EN-1 recognises at para 5.10.5 that <i>"Virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape, but there may</i>

Reference	Comments/Issue raised	Applicant's Response
		<i>also be beneficial landscape character impacts arising from mitigation."</i> The Applicant is seeking a time-limited consent for the Scheme to have an operational period of 60 years, with decommissioning to take place following cessation of operation. This is secured by Requirement 20 in Schedule 2 of the Draft DCO [APP-016]. As set out in the Applicant's Written Summary on Oral Submissions at Issue Specific Hearing 4, the Applicant has updated the Draft DCO at Deadline 4 to clarify that the 60 year period is not from the date of first commissioning of each component of the Scheme, but rather starts from the date Work No.1 is first commissioned.
GDPR-LDSF-005	■■■ queried why there are plans to install the solar panels, but no plans to take them down. ■■■ finished by asking Lime Down why they want to ruin ■■■ memories of Wiltshire and ■■■ friends' memories.	The Applicant confirms that the solar panels will be removed at decommissioning stage as confirmed by Paragraph 2.1.3 of the Outline Decommissioning Strategy [REP3-096]. The Applicant acknowledges the individual's concerns regarding the effect of the Scheme on their personal memories and enjoyment of the area. Whilst individual experiences are subjective and thus difficult to measure, the Applicant has sought to minimise landscape and visual effects through the design of the Scheme and proposed mitigation measures set out in ES Volume 1, Chapter 8: Landscape and Visual [REP3-025].

2.22 Craig Fuller

Reference	Comments/Issue raised	Applicant's Response
CF-001	██████ introduced ██████ as a resident, living in the family home in Fosse Farm for 55 years. ██████ noted the memories ██████ shared in the countryside and home, with every field, footpath and lane an important part of his family's life. ██████ further noted the heritage rich landscape and soundscape. ██████ is devastated by the proposal, and that a 60 year consent is not temporary and spans many generations. ██████ children will be older than ██████ before it ends. ██████ does not believe any of the landowners envisaged agreements leading to industrial development lasting 60 years, and so it is the wrong development, at the wrong scale, in the wrong place. It would industrialise a peaceful rural landscape that families have cherished for generations, with the impact on the home being severe.	The Applicant is seeking a time-limited consent for the Scheme to have an operational period of 60 years, with decommissioning to take place following cessation of operation. This is secured by Requirement 20 in Schedule 2 of the Draft DCO [APP-016]. The LVIA set out in ES Volume 1 Chapter 8 Landscape and Visual [REP3-025] acknowledges that as a consequence of the Development, there would be significant adverse effects to Landscape Character and visual amenity. However, NPS EN-1 recognises at para 5.10.5 that <i>"Virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape, but there may also be beneficial landscape character impacts arising from mitigation."</i> and at Para 5.10.13 that <i>"All proposed energy infrastructure is likely to have visual effects for many receptors around proposed sites."</i> With regard to the scale and location of the Scheme, the Statement of Need [REP1-085] explains further why projects at the scale proposed for the Scheme are required to meet the government's renewable energy targets as set out in Clean Power 2030 Action Plan. As to the location, the Applicant has carried out a comprehensive site selection assessment as set out in the Site Selection Assessment Report [APP-185] including a review of 9 alternative locations (PDAs) for the Scheme against standardised assessment criteria such as potential effects on ecology, heritage, landscape and land use (including agricultural land) together with a

Reference	Comments/Issue raised	Applicant's Response
		high level review of other areas within the selected search area. In addition to the assessment set out in the Site Selection Assessment Report [APP-185], the Applicant has reconsidered how the identified PDAs could be grouped together, has extended the search area for alternative sites to 25 km and has reconsidered additional land around the previously identified PDAs to check whether the addition of such land would affect its conclusions on the suitability of PDAs (see Technical Note on Site Selection Assessment [REP2-043]). The conclusion of the Applicant's assessment is that there are no more suitable and available locations within the 25 km search area than the proposed location for the Scheme, based on the criteria identified. The Applicant considers its site selection assessment to be in line with NPS EN-1 (including but not limited to paragraphs 4.3.22 – 4.3.29), NPS EN-3 (including but not limited to paragraphs 2.10.18 – 2.10.34) and the requirements of Regulation 2 and paragraph 2 of Schedule 4 to the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017.
CF-002	██████ further explained that one of the major construction compounds for sections A, B, and C will sit on one side of the home, while the cable route for all three sections will converge through a field on the other side, so ██████ will be surrounded by industrial infrastructure.	The Applicant notes the respondents concerns regarding the proximity of construction activity to his property. The construction compound and associated works in proximity to the respondent's property would be temporary in nature. They would be used only for the necessary working periods within the anticipated two-year construction programme and would not operate continuously throughout that full period.

Reference	Comments/Issue raised	Applicant's Response
	■ noted that the local road network is unsuitable, with construction traffic remaining on two principal challenging roads, which will lead to road closures, and traffic management will force residents, riders, cyclists, and walkers onto narrow single track lanes never designed for that level. It won't be about if accidents happen, but rather when they will happen. ■ further noted that the junction at Ladyswood behind a blue sign, with an important stud and young foals will become extremely busy, and additional construction traffic will make it more hazardous. The other route south to Hullavington will face major disruption from the A429. This will continue for decades, with no clear explanation how traffic movements will be monitored or restrictions and conditions effectively enforced. Once the country is industrialised, there will be no going back. ■ queried to think about the families who live here, the people who use the roads, the irreversible impact on the homes and countryside.	Once operational, the cable infrastructure would be located underground. In this respect, it would be similar in principle to other buried utility infrastructure in the area, including the nearby National Gas transmission pipeline. Following installation and reinstatement of the land, the presence of the cable route would not give rise to the same type of activity associated with the construction phase. See response to TT1.18 in The Applicant's Response to the Examining Authority's First Written Questions [REP3-128]. This sets out how the likely effects of the scheme in relation to Non-Motorised Users has been assessed and supports the conclusion of no significant effects presented in ES Volume 1, Chapter 13 Transport and Access (Rev3) [REP3-065]. It also sets out how specific mitigation and measures within the Outline CTMP [REP3-108] will take account of Non-motorised Users. The construction phase will last for two-years, and traffic impacts will therefore be temporary. Also see Applicant's response to WCWR-020 in the Applicant's Response to Submissions Received at Deadline 2 [REP3-129]. This states that information has been provided to demonstrate the construction route are of a suitable width to accommodate construction traffic

Reference	Comments/Issue raised	Applicant's Response
		The Applicant also confirms that a report on the financial impacts to equine businesses will be submitted at Deadline 5.