Lime Down
Solar Park

The Applicant's Response to Submissions Received at Deadline 3

July 2026

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1 Introduction

1.1 Purpose of Document

1.1.1 This document provides Lime Down Solar Park Limited (the Applicant's) response to submissions made at Deadline 3 (15 June 2026) by Interested Parties. It is noted that Deadline 3 submissions consist of comments on submissions received at Deadline 2 and any further information requested by the ExA.

1.1.2 Responses to the ExA's first written questions (ExQ1) have been responded to separately in the **Applicant's Response to Other Parties' Responses to the ExA's Frist Written Questions [EN010168/EXAM/9.45]** submitted at Deadline 4.

1.1.3 A total of 35 documents were submitted by Interested Parties at Deadline 3 and published on the Planning Inspectorate (PINS) website on 17 June 2026. The Examining Authority (ExA) subsequently exercised its discretion to accept two further submissions, which were published on the PINS website on 29 June 2026 and 1 July 2026.

1.1.4 Stop Lime Down submitted a document on the use of the SLD Digital Map **[AS-019]**. A response to that submission has not been provided in this document; however, the Applicant has noted its contents.

1.1.5 Where IPs provided a response to comments made at Deadline 2, and a response to the ExA's First Written Questions in one document, the relevant information has been added to this document.

1.2 Structure of Document

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

- Table 1-1 sets out the list of acronyms used for management documents that form part of the Applicant's submission and may have been referred to by the Applicant in responding.
- Table 1-2 lists the local authorities that have submitted comments. These submissions are presented and responded to in full in **Section 2** of this document.
- Table 1-3 lists the statutory consultees, undertakers and notable parties that have submitted comments and with whom the Applicant is seeking to undertake a Statement of Common Ground. These submissions are presented and responded to in full in **Section 3** of this document.

- Table 1-4 lists the parties that have submitted comments and are also listed within the **Book of Reference [REP3-009]**. These submissions are presented and responded to in full in **Section 4** of this document.
- Table 1-5 lists the submissions received from members of the public and all remaining organisations and businesses. These submissions are presented and responded to in **Section 5** of this document.

1.2.2 References to the Application documentation are provided in accordance with the referencing system set out in the Planning Inspectorate's Lime Down Solar Park Examination Library.

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

Table 1-1 List of Acronyms

Acronym	Document
BESS	Battery Energy Storage System
BNG	Biodiversity Net Gain
BSMP	Battery Safety Management Plan
CEMP	Construction Environmental Management Plan
CNL	Cotswolds National Landscape
CR	Consultation Report
CTMP	Construction Traffic Management Plan
DCO	Development Consent Order
DS	Decommissioning Strategy
EIA	Environmental Impact Assessment
EPMP	Ecological Protection and Mitigation Plan
EPMS	Ecological Protection and Mitigation Strategy
EqIA	Equality Impact Assessment
ES	Environmental Statement
FRADS	Flood Risk Assessment and Drainage Strategy
FTE	Full Time Equivalent
GVA	Gross Value Added
LEMP	Landscape and Ecological Management Plan
OEMP	Operational Environmental Management Plan
PEIR	Preliminary Environmental Information Report

Acronym	Document
PROWPPMP	Public Rights of Way and Permissive Paths Management Plan
SRMP	Soil Resources Management Plan
SSCEP	Skills, Supply Chain and Employment Plan
SWMP	Site Waste Management Plan
WRS	Water Resources Strategy

1.3 Table of Parties Submitting Comments

Table 1-2 List of Parties Whose Submissions Are Responded to in Section 2

Examination Library Reference	Acronym	Book of Reference Plot Number	Relevant Representations Received From
REP3-141	WC	Party not referenced in the Land and Rights Negotiations Tracker.	Wiltshire Council

Table 1-3 List of Parties Whose Submissions Are Responded to in Section 3

Examination Library Reference	Acronym	Book of Reference Plot Number	Relevant Representations Received From
REP3-148	NGET	16-014, 16-016, 16-019, 16-017, 16-020	National Grid Electricity Transmission PLC
REP3-150	NH	09-018, 09-019, 09-020, 09-021, 13-003, 13-005, 13-006, 13-008, 13-009, 13-012, 13-013, 13-014, 13-016, 20-001, 20-002, 20-003, 21-001, 21-002, 21-003, 21-004, 21-005, 21-006, 21-007	National Highways
REP3-152	RM	N/A	Royal Mail
REP3-154	CNLB	N/A	Cotswolds National Landscape Board
REP3-146	EA	N/A	Environment Agency
REP3-173	SLD	N/A	Stop Lime Down

Table 1-4 List of Parties Whose Submissions Are Responded to in Section 4

Examination Library Reference	Acronym	Book of Reference Plot Number	Relevant Representations Received From
REP3-166	JSW	Party not referenced in the Land and Rights Negotiations Tracker.	Jonathan Seymour Williams
REP3-170	JE	05-043, 06-003, 06-004, 06005, 06-006	Mr John Eavis and Mrs Rosemarie Eavis
REP3-174	VJS	Party not referenced in the Land and Rights Negotiations Tracker	Vanessa Jayne Shipp

Table 1-5 List of Parties Whose Submissions Are Responded to in Section 5

Examination Library Reference	Acronym	Relevant Representations Received From
REP3-162	GDPR	GDPR -LDSF-082
REP3-163	JF	January Farrington
REP3-164		Jill Antonia Nash
REP3-168	KL	Kim Langley
REP3-175	VJC	Vivienne Jane Clarke

2 The Applicant's Response to Host and Neighbouring Local Authorities

2.1 Wiltshire Council

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
WC-001	Description and DCO Process Construction and Decommissioning	Outline Construction Environmental Management Plan	1. 7.12 Outline Construction Environmental Management Plan (Rev 3) [REP2-019] 1.1. The council understands that the Applicant intends to revise and reissue the majority of the outline management plans at Deadline 3, therefore the council reserves comment until it has had the opportunity to review these amended documents. This is particularly important, given the Applicant's response to the identified additional Requirements within the council's Local Impact Report [REP1-137].	The Applicant notes this comment. Updated outline management plans provided at Deadline 3 of Examination are now available for Wiltshire Council's review at **REP3-092** to **REP3-109** of the Examination Library.
WC-002	Description and DCO Process Construction and Decommissioning	Outline Construction Environmental Management Plan	1.2. However, as an example of the type of the changes that the council would require within the Outline CEMP, the council would require CV's with identifiable qualifications and their experience	As set out in section 2.1 of the **Outline Construction Environmental Management Plan (CEMP) [REP3-092]** detailed roles and responsibilities in managing environmental impacts

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			to be provided to the council for all roles e.g. Arboricultural Clerk of Works.	will be set out in the detailed CEMP. Table 4 of the **Outline CEMP [REP3-092]** specifies that work to trees will be managed by an Arboricultural Clerk of Works, which will be reflects in the detailed CEMP developed for the Scheme. The detailed CEMP will require the approval of Wiltshire Council under Requirement 13 of the **Draft Development Consent Order (DCO) [REP3-005]** prior to final issue. Regarding the provision of CVs to the council for review, the Applicant believes that this is not a proportionate requirement as Table 4 of the **Outline CEMP [REP3-092]** states that '*Only qualified arboricultural contractors, in accordance with British Standard 3998:2010, will perform tree work*.' Thus, as the Outline CEMP is a certified document, the statement above from Table 4 must be adhered to be in compliance with the DCO.
WC-003	Arboriculture	Tree Protection Orders	1.3. All works to Category B, Category A, Ancient Trees, Veteran	The Applicant notes that a framework for monitoring and

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			Trees and Trees protected by a TPO are required to be appropriately monitoring, recorded and reported to the Local Planning Authority (LPA), including: • Tree removal • Canopy and root damage • Hand-digging and root pruning • Installation of ground protection.	recording the categories of works identified by Wiltshire Council is already established within the secured application documents. Table 4 of the **Outline Construction Environmental Management Plan (CEMP) [REP3-092]** provides for ongoing Arboricultural Clerk of Works (ACoW) supervision across each of the activities identified by Wiltshire Council, including tree removal (with the ACoW consulted prior to works on TPO trees), tree pruning and canopy and stem damage, and the installation of ground protection and supervision of hand-digging within Root Protection Areas. In respect of reporting, the **Outline EPMS [REP3-102]** provides that a quarterly report will be prepared by the EcoCoW and made available to the Local Planning Authority upon request, including a detailed log of monitoring activities by the Site Environmental Manager and EcoCoW, together with details of

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				any breaches of the EPMS and the remedial steps taken.
WC-004	Arboriculture	Root Protection Areas	1.4. Temporary compounds should be situated outside of the Root Protection Area (RPA), not canopy, of trees and woodlands so that it is consistent with the content of "Root loss / damage from excavation or soil compaction within RPAs", rather than what is stated in "Tree Pruning".	Temporary compounds will be located outside of the RPA of retained trees and woodlands as detailed in Table 4 of the **Outline Construction Environmental Management Plan (CEMP) [REP3-092]**.
WC-005	Arboriculture	Tree Protection Orders	1.5. The removal of Category B, Category A, Ancient Trees, Veteran Trees and Trees protected by a TPO must be reported to the LPA prior to works being carried out.	The Applicant notes that the mechanism for providing this information to the LPA is already established in the secured documents. Table 4 of the **Outline Construction Environmental Management Plan (CEMP) [REP3-092]** provides that tree removals will be marked on-site by the ACoW, with final decisions made during detailed site design and cable trench micro-siting, and that a detailed Arboricultural Method Statement (AMS), based on post-DCO detailed design, will be produced prior to construction commencing and included within

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				the detailed CEMP. The detailed CEMP will be submitted to the LPA for approval before the Scheme commences construction, in accordance with Requirement 13 of the **Draft Development Consent Order (DCO) [REP3-005]**. The confirmed list of trees referred to in the Applicant's response above will therefore form part of the detailed AMS, which the LPA will be required to approve before any works commence. In addition, the trees already identified as potentially subject to TPO-related works are set out in Part 3 of Schedule 12 to the **Draft DCO [REP3-005]**, providing Wiltshire Council with early visibility of the TPO trees within the scope of the Scheme.
WC-006	Hydrology, Flood Risk and Drainage	Flood Risk Management Plan	1.6. From a flood risk and drainage perspective, while a range of flood risk mitigation measures are identified, the Outline CEMP relies on future preparation of a Flood Risk Management Action Plan and Water Management Plan, meaning	The Flood Risk Management Action Plan and Water Management Plan are not unsecured future mitigation. They are required components of the detailed Construction Environmental Management Plan

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			there is limited certainty at this stage on how construction activities will avoid increasing flood risk, particularly during extreme rainfall events.	(CEMP) and must apply the measures and principles already set out in Table 5 of the **Outline CEMP [REP3-092]**. The Outline Construction Environmental Management Plan (CEMP) identifies the matters that those plans must address, including temporary drainage, sediment and water quality management, protection of existing drainage features, flood warning procedures, construction sequencing, contingency measures and the management of interfaces between different working areas. It also requires a Flood Risk Management Action Plan to include 24-hour availability during flood warnings, evacuation and site closedown procedures, removal or protection of mobile plant and materials, and a hierarchy of measures to be implemented as flood risk increases.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				The final arrangements must reflect the construction programme, location and extent of active working areas, temporary drainage catchments and contractor methodology. Those details are not fixed at this stage and could not be defined reliably without making assumptions about temporary works that may not be used. The **Outline CEMP [REP3-092]** is a certified document under Schedule 13 of the **Draft Development Consent Order (DCO) [REP3-005]**. Requirement 13 requires the detailed CEMP to be prepared substantially in accordance with it, submitted to and approved by the relevant planning authority before the relevant construction stage commences, and subsequently implemented. The Applicant therefore considers that the necessary construction flood risk

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				controls are secured at the appropriate stage of the DCO process.
WC-007	Hydrology, Flood Risk and Drainage	Flood Risk Mitigation	1.7. The proposed approach to temporary drainage and runoff management lacks detailed hydraulic design or quantification, limiting confidence that site runoff will be effectively controlled and will not exacerbate local flood pathways.	Temporary drainage cannot be subject to final hydraulic design or quantification until the contributing areas, temporary compounds, areas of exposed ground, construction sequence and receiving drainage features are known. Construction will be phased and the whole Order Limits will not be simultaneously disturbed or operate as a single temporary drainage catchment. Table 5 of the **Outline CEMP [REP3-092]** requires a temporary drainage system to prevent silt-laden runoff from entering surface water drains, watercourses or ponds without treatment. It identifies measures including cut-off drainage, earth bunds, geotextile silt fencing, check dams, settlement features, temporary lagoons, tanks, silt screens and proprietary treatment.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Appropriately sized runoff storage must be provided where settlement of fine particulates is required. The temporary measures will be selected and sized for the actual contributing area and risk at each working location through the Water Management Plan. Existing flow pathways and drainage features must be identified and protected so that the temporary works do not establish uncontrolled connections to downstream receptors. The Water Management Plan forms part of the detailed CEMP secured through Requirement 13 of the **Draft Development Consent Order (DCO) [REP3-005]**. The relevant construction stage cannot commence until that detailed CEMP has been approved. This allows the temporary drainage design to be based on the final construction information rather than speculative assumptions made at the DCO application stage.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
WC-008	Hydrology, Flood Risk and Drainage	Flood Risk Mitigation	1.8. Although measures such as restricting works in Flood Zone 3 during warnings are noted, there is limited clarity on how construction sequencing will adapt dynamically to forecast rainfall events and catchment-wide conditions.	Construction sequencing will respond to forecast and observed rainfall and flood conditions. Table 1 and Table 5 of the **Outline CEMP [REP3-092]** require the contractor to monitor weather forecasts, Environment Agency flood alerts and warnings and local waterway levels, and to plan works accordingly. Works within Flood Zone 3 will not be undertaken while an Environment Agency Flood Warning is in force. The Flood Risk Management Action Plan must also provide for 24-hour mobilisation, evacuation and site closedown, together with the removal or protection of plant, materials and potentially hazardous substances. The detailed plan will identify how individual working areas will be paused, protected or resequenced as conditions change. These arrangements must be based on the final programme and the works

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				taking place at the time and cannot sensibly be prescribed against hypothetical future forecasts at the application stage. The detailed CEMP, including the Flood Risk Management Action Plan, is subject to approval under Requirement 13 of the **Draft Development Consent Order [REP3-005]** before the relevant construction stage commences.
WC-009	Hydrology, Flood Risk and Drainage	Flood Risk Mitigation	1.9. The reliance on management procedures (e.g. flood response, monitoring, and removal of plant during flood events) introduces uncertainty compared to embedded physical mitigation measures.	The construction flood risk mitigation includes physical measures and does not rely only on flood response, monitoring or removal of plant. Table 5 of the **Outline CEMP [REP3-092]** requires temporary drainage and runoff controls including cut-off drains, earth bunds, geotextile silt fencing, check dams, drain covers, sandbags, settlement features, temporary lagoons or tanks, silt screens and proprietary treatment where required. Existing land drains, watercourses and overland

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				flow routes must also be identified and protected. The physical measures will be located in response to the source, pathway and receptor at each active working area. Cut-off drainage and bunding will be used around or upslope of excavations, stockpiles and disturbed ground where clean runoff needs to be diverted or construction runoff intercepted. Silt fencing, check dams and settlement measures will be placed downslope of disturbed areas and before runoff could enter an existing drain, ditch, watercourse or other sensitive receptor. Existing drains and watercourse crossings will be protected where there is a risk of sediment-laden runoff entering them. Temporary storage or treatment will be provided where runoff requires settlement before controlled discharge, infiltration, reuse or removal.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Construction compounds, material storage and stockpiles will not be located within Flood Zone 3b and will, where practicable, be located outside the 1 in 100 year flood extent. Temporary measures will also be arranged so that established overland flow routes and floodplain capacity are maintained. The precise locations, dimensions and treatment arrangements cannot be shown until the construction compounds, haul routes, excavations, stockpile areas and sequence of working are fixed. These will be shown in the Water Management Plan forming part of the detailed CEMP. The detailed CEMP must be prepared substantially in accordance with the certified **Outline CEMP [REP3-092]**, approved before the relevant construction stage commences and then implemented under Requirement 13: Construction Environmental Management Plan

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				of the **Draft Development Consent Order [REP3-005]**. The management procedures identified by the Council complement these physical controls by ensuring that they are installed before the relevant works, inspected, maintained and adapted as construction progresses.
WC-010	Hydrology, Flood Risk and Drainage	Water Management Plan	1.10. The Water Management Plan is referenced as a future document, and without defined performance standards, trigger levels, and response actions, the robustness of flood and water management cannot be fully assessed.	The principal performance standards, triggers and response actions are already defined in Table 5 of the **Outline CEMP [REP3-092]**. The required outcomes include preventing untreated sediment-laden runoff from entering surface water drains, watercourses or ponds; separately containing potentially contaminated water; preventing uncontrolled discharge of washdown water; protecting existing land drains, watercourses and flow routes; and obtaining any necessary approvals or permits before discharging to controlled waters or sewers.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				An Environment Agency Flood Warning triggers the flood response measures, including cessation of works within Flood Zone 3. Where water quality monitoring identifies unsatisfactory suspended solids or other pollutants, the contractor must revise the drainage or settlement arrangements and provide additional treatment where required. The final monitoring locations, parameters and location-specific trigger levels depend on the construction activity, temporary discharge arrangement and receiving receptor. These must be defined in the Water Management Plan and approved as part of the detailed CEMP under Requirement 13 of the **Draft Development Consent Order [REP3-005]**. The role of the Water Management Plan is therefore to apply the secured standards and actions to the final construction

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				arrangements, rather than to determine whether those controls will be provided.
WC-011	Hydrology, Flood Risk and Drainage	Water Quality Mitigation Measures	1.11. Water quality mitigation measures are largely procedural and depend on correct implementation of good practice. There is limited site-specific evidence demonstrating effectiveness under worst-case construction scenarios.	The construction water quality assessment is site-specific and is not based only on generic good practice. The relevant receptors, pathways and potential construction effects are assessed in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP3-015]**, the **FRA and Drainage Strategy suite [REP3-039, REP3-049, REP3-051, REP3-053, REP3-055, REP3-057, REP3-059, REP3-061 and REP3-063]** and the **Water Framework Directive Assessment [REP1-094]**. Table 5 of the **Outline Construction Environmental Management Plan [REP3-092]** translates that assessment into physical and procedural controls. These include containment of fuels and chemicals, designated refuelling and washdown areas, protection of drains, separation of

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				potentially contaminated water, settlement and treatment of runoff, controlled concrete washout, pollution incident response and risk-based monitoring. The reasonable construction scenario is phased and localised. The whole Order Limits will not be simultaneously stripped or disturbed, and the relevant risk at any time will depend on the activity and receptor connected to the active working area. The detailed Water Management Plan must apply the secured controls to those site-specific circumstances. The Water Management Plan will form part of the detailed CEMP approved under Requirement 13 of the **Draft Development Consent Order [REP3-005]**. Its implementation will be overseen through the monitoring, inspection and audit arrangements in Sections 5 and 6 of the Outline CEMP.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
WC-012	Hydrology, Flood Risk and Drainage	Water Quality Monitoring	1.12. Proposed monitoring of water quality is high-level, with key details such as sampling locations, parameters, and thresholds deferred to later stages, reducing confidence in the adequacy of pollution control.	Sampling locations, parameters and thresholds must relate to the actual construction activity, temporary drainage arrangement, baseline water quality and receiving receptor. Those details cannot be selected meaningfully until the working areas and temporary discharge pathways are confirmed. Table 5 of the **Outline Construction Environmental Management Plan (CEMP) [REP3-092]** requires the Water Management Plan to cover pre-construction, construction and post-construction water quality. Monitoring will include visual inspections and risk-based measurements or sampling, with greater frequency during higher-risk activities such as earthworks and concrete works. Where sampling is required, appropriate accredited methods and laboratories will be used.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				The **Outline CEMP [REP3-092]** also defines the response to adverse results. Where monitoring identifies unsatisfactory suspended solids or other pollutants, drainage, settlement or treatment measures must be reviewed and strengthened. The detailed monitoring locations, parameters, frequency and thresholds will be included in the detailed CEMP. Requirement 13 of the **Draft Development Consent Order [REP3-005]** requires that document to be approved before the relevant construction stage commences and the works to be carried out in accordance with it.
WC-013	Hydrology, Flood Risk and Drainage	Runoff	1.13. The approach to controlling sediment-laden runoff relies on standard measures (e.g. silt fences, bunds), but there is limited quantification of expected sediment loads and treatment capacity across the site.	A single sediment load or treatment capacity for the whole Order Limits would not represent the proposed construction activities. Sediment generation will vary according to the extent and duration of the active working area, soil type, slope, rainfall, soil

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				moisture and the particular activity being undertaken. Table 5 of the **Outline Construction Environmental Management Plan (CEMP) [REP3-092]** therefore requires the temporary drainage and treatment measures to be designed for the actual working area. It requires appropriately sized runoff storage where settlement of fine particulates is necessary and identifies a treatment train that may include cut-off drainage, bunds, silt fencing, check dams, temporary lagoons or tanks, settlement features, silt screens, proprietary treatment and flocculants where required. The drainage system must prevent untreated silt-laden runoff from reaching drains, watercourses or ponds. Monitoring provides a further check on performance and requires the drainage or treatment arrangements to be amended

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				where suspended solids or other pollutants are unsatisfactory. The detailed design and capacity of the temporary measures will be set out in the Water Management Plan once the contributing areas are known. That plan is secured as part of the detailed CEMP under Requirement 13 of the **Draft Development Consent Order [REP3-005]**.
WC-014	Hydrology, Flood Risk and Drainage	Silt Management Measures	1.14. Silt management measures are appropriate in principle, however their effectiveness is dependent on maintenance and inspection regimes which are not fully specified at this stage.	The inspection and maintenance arrangements are set out in Sections 5 and 6 of the **Outline Construction Environmental Management Plan (CEMP) [REP3-092]**. The detailed CEMP must define the roles and responsibilities for implementation, monitoring, inspections and audits. The Environmental Manager will be present during construction and when new activities commence, undertake site walkovers, record departures from the detailed CEMP and identify corrective action.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Actions arising from inspections will be recorded in an Environmental Action Schedule, discussed with the Site Manager and issued weekly for implementation. Regular formal inspections and audits are also required, with records retained by the Environmental Manager or Construction Project Manager. Table 5 separately requires inspection and maintenance commitments for temporary drainage and sediment controls. The precise frequency will depend on the type of measure installed, the activity taking place, rainfall conditions and the sensitivity of the receiving receptor. It is appropriate for this to be specified in the detailed CEMP once the measures and working areas are known. The detailed CEMP is subject to approval and implementation under Requirement 13 of the **Draft Development Consent Order [REP3-005]**.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
WC-015	Construction and Decommissioning	Works Management	1.15. The commitment to undertake earthworks during drier periods is noted, but it is unclear how this will be managed in practice given programme constraints and potential climate variability.	The commitment to undertake activities likely to generate silt-laden runoff during drier periods is expressed as a preference and is not the sole control relied upon. The **Outline Construction Environmental Management Plan (CEMP) [REP3-092]** requires weather forecasts, flood alerts and local conditions to be monitored and the works planned accordingly. Where wet-weather working cannot be avoided, runoff must be intercepted and treated, exposed ground and stockpiles must be protected, and temporary drainage and sediment controls must be installed and maintained. Works can be paused, protected or resequenced where forecast or observed conditions make them unsuitable. These requirements must be incorporated into the final construction programme and detailed CEMP. Requirement 13 of

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				the **Draft Development Consent Order [REP3-005]** requires the relevant construction stage to be carried out in accordance with the approved detailed CEMP. Programme constraints would not disapply those controls.
WC-016	Hydrology, Flood Risk and Drainage	Buffer Zones	1.16. The use of buffers (e.g. 10m to receptors) is identified, but there is limited justification for their adequacy in all locations, particularly for steeper slopes or highly connected drainage features.	The 10 m buffer is a general precautionary stand-off to sensitive receptors where practicable and is not relied upon as the sole means of controlling runoff or pollution. Table 5 of the **Outline Construction Environmental Management Plan (CEMP) [REP3-092]** requires construction compounds and stockpiles to be located as far from receptors as practicable and requires additional source and pathway controls where necessary. These include cut-off drainage around excavations or stockpiles, bunding, silt fencing, settlement features, separate containment of potentially contaminated water and treatment before discharge.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				At steeper or more hydrologically connected locations, the adequacy of the protection will therefore be determined from the combined buffer, temporary drainage and treatment arrangement, taking account of the local slope, soil disturbance, receiving feature and flow connectivity. Those location-specific arrangements will be defined through the Water Management Plan and approved as part of the detailed CEMP under Requirement 13 of the **Draft Development Consent Order [REP3-005]**.
WC-017	Hydrology, Flood Risk and Drainage	SuDS	1.17. Temporary SuDS and attenuation are referenced but not defined in detail, limiting the ability to assess whether sufficient storage and treatment capacity will be provided.	The type, location and capacity of temporary SuDS cannot be finalised until the active contributing area, duration of disturbance, construction activity, local slope, soil condition and receiving drainage feature are known. Table 5 of the **Outline Construction Environmental Management Plan (CEMP)**

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				[REP3-092] requires temporary drainage, attenuation and sediment controls where necessary. It identifies measures including appropriately sized runoff storage, settlement facilities, temporary lagoons or tanks, cut-off drainage, French drains, permeable trenches and other passive drainage features appropriate to local conditions. The Water Management Plan will select and size the temporary measures for each relevant working area once the information required for that design is available. It will form part of the detailed CEMP, which must be approved before the relevant construction stage commences under Requirement 13 of the **Draft Development Consent Order [REP3-005]**. This provides control over the adequacy of storage and treatment capacity without fixing temporary features against assumed working

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				areas that may not correspond with the final construction programme.
WC-018	Hydrology, Flood Risk and Drainage	Temporary Drainage Systems	1.18. The interaction between temporary drainage systems and existing field drains and watercourses is not clearly demonstrated, creating uncertainty regarding downstream impacts.	Table 5 of the **Outline Construction Environmental Management Plan (CEMP) [REP3-092]** requires all land drains and waterbodies within the relevant working area to be identified and protected. Untreated construction runoff must not be connected to field drains, surface water drains or watercourses, and existing overland flow routes must be maintained. The available protection measures include drain covers, sandbags, earth bunds, silt fencing, settlement measures and proprietary treatment. Existing highway drains affected by construction traffic must also be identified and protected or kept clear through road sweeping and maintenance. The interaction between the Cable Route Corridor and watercourses

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				is assessed in **ES Volume 3, Appendix 11-9: Flood Risk Assessment and Drainage Strategy - Cable Route Corridor [REP3-063]** and recorded in the **Watercourse Crossing Schedule [REP3-122]**. The final alignment and individual field drain interfaces will be confirmed through detailed design and pre-construction surveys. The Water Management Plan must set out the temporary drainage arrangement for each working area, including interfaces between the Solar PV Sites and Cable Route Corridor. This is secured through approval of the detailed CEMP under Requirement 13 of the **Draft Development Consent Order [REP3-005]**.
WC-019	Hydrology, Flood Risk and Drainage	Mitigation Measures	1.19. Wheel washing and trackout controls are identified, however there is limited evidence that these measures alone will adequately prevent sediment mobilisation into nearby receptors.	Wheel washing and trackout controls are not relied upon alone to prevent sediment reaching nearby receptors. They form part of the wider treatment train set out in Table 5 of

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				the **Outline Construction Environmental Management Plan (CEMP) [REP3-092]**. This includes minimising exposed ground, locating and protecting stockpiles, intercepting runoff using temporary drainage, providing silt fencing, bunds and settlement measures, protecting surface water drains, maintaining site access points and public roads, and monitoring the effectiveness of the controls. Wheel washing must take place in designated areas where wash water can be contained, treated, recycled or removed. It must not discharge uncontrolled to ground, field drains or surface water. The location and detailed arrangement of the controls will be confirmed in the detailed CEMP once the construction compounds, access points and drainage pathways are known. Their provision and implementation are secured through Requirement 13

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				of the **Draft Development Consent Order [REP3-005]**.
WC-020	Hydrology, Flood Risk and Drainage	Construction Environmental Management Plan	1.20. The reliance on contractor-led implementation and future detailed CEMP development introduces uncertainty, particularly given the scale and spatial extent of the Scheme.	The contractor will prepare the construction-specific detail but will not determine the environmental standards or decide whether the identified mitigation is required. Paragraphs 1.1.6 to 1.1.11 of the **Outline Construction Environmental Management Plan (CEMP) [REP3-092]** require the detailed CEMP to be prepared substantially in accordance with the certified Outline CEMP. The measures in Table 5 are minimum requirements to be carried into the detailed document. Requirement 13 of the **Draft Development Consent Order (DCO) [REP3-005]** prevents the relevant construction stage from commencing until the detailed CEMP has been submitted to and approved by the relevant planning authority. The works must then be

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				carried out in accordance with the approved document. The Construction Project Manager and Environmental Manager are responsible for compliance, monitoring, inspections, audits and corrective action. Although implementation will form part of the contractor's contractual responsibilities, the Applicant remains ultimately responsible for compliance with Requirement 13. The scale and spatial extent of the Scheme make phase-specific and location-specific detailed CEMPs appropriate. They do not reduce the control provided by the certified Outline CEMP or the DCO Requirement.
WC-021	Hydrology, Flood Risk and Drainage	Spillage Control Measures	1.21. While spillage control measures are outlined, the cumulative risk of multiple small-scale pollution events across a large construction site is not assessed.	Construction water quality effects have been assessed for the Scheme as a whole in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP3-015]** and the **Water Framework Directive Assessment [REP1-094]**.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				The risk from multiple small incidents is controlled by applying the same source control, containment and response standards at each active working area. Table 5 of the **Outline Construction Environmental Management Plan (CEMP) [REP3-092]** requires fuels, oils and chemicals to be securely stored with secondary containment; refuelling to take place in designated areas; plant to be inspected and maintained; spill kits to be available; and potentially contaminated water to be contained for treatment or removal. An Emergency Spillage Plan and emergency response procedures must be included in the detailed CEMP. Incidents and departures from the approved controls must be recorded, investigated and subject to corrective action. These measures prevent separate minor events from establishing

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				pathways to the same water receptor and developing into a cumulative adverse effect. Their application across all working areas is secured through Requirement 13 of the **Draft Development Consent Order [REP3-005]**.
WC-022	Hydrology, Flood Risk and Drainage	Combined Impacts	1.22. The document does not provide an integrated assessment of flood risk, water quality, and sediment management, limiting understanding of combined impacts.	The integrated assessment of flood risk, water quality and sediment-related effects is provided in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP3-015]**, the **FRA and Drainage Strategy suite [REP3-039, REP3-049, REP3-051, REP3-053, REP3-055, REP3-057, REP3-059, REP3-061 and REP3-063]** and the **Water Framework Directive Assessment [REP1-094].** The purpose of the **Outline Construction Environmental Management Plan (CEMP) [REP3-092]** is to translate the findings and mitigation identified through those assessments into

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				construction controls. Table 5 brings flood response, temporary drainage, sediment management, water quality monitoring, spills, washdown, concrete works, dewatering, watercourse crossings and groundwater protection into a single management framework. The Water Management Plan will apply those combined controls to each active working area and must address interfaces between the Solar PV Sites and Cable Route Corridor. It forms part of the detailed CEMP secured through Requirement 13 of the **Draft Development Consent Order [REP3-005]**. The Outline CEMP is therefore not intended to repeat the assessment contained in the ES and supporting documents. It provides the mechanism for implementing the integrated mitigation identified by that assessment.
WC-023	Hydrology, Flood Risk and Drainage	Pollution Prevention Measures	1.23. There is limited clarity on how compliance with pollution	Compliance, inspection and auditing arrangements are set out

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			prevention measures will be enforced and audited during construction.	in Sections 5 and 6 of the **Outline Construction Environmental Management Plan (CEMP) [REP3-092]**. The detailed CEMP must define the responsible personnel, training, site briefings, communication, document control, monitoring, inspections, audits and emergency procedures. The Construction Project Manager and Environmental Manager are expressly responsible for ensuring compliance. The Environmental Manager will be present during construction and when new activities commence, undertake site walkovers and record any departure from the detailed CEMP. The Applicant must be informed of deviations, and corrective actions will be documented through an Environmental Action Schedule issued weekly for implementation. Regular formal inspections and

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				audits are also required, with records retained throughout construction. Requirement 13 of the **Draft Development Consent Order [REP3-005]** requires the detailed CEMP to be approved and the relevant construction stage to be carried out in accordance with it. Failure to comply with the approved document would therefore constitute non-compliance with the DCO.
WC-024	Description and DCO Process	Monitoring	1.24. The role of monitoring in triggering mitigation responses is not clearly defined, reducing confidence that corrective actions will be timely and effective.	Monitoring is not proposed solely for record keeping. Its purpose is to confirm that the pollution prevention, temporary drainage and treatment measures are operating effectively and to trigger corrective action where they are not. Table 5 of the **Outline Construction Environmental Management Plan (CEMP) [REP3-092]** requires visual inspections and risk-based water

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				quality measurements or sampling, with increased monitoring during higher-risk activities such as earthworks, concrete works, dewatering and works close to water receptors. Monitoring will be undertaken at locations relevant to the active working area, the temporary drainage pathway and the receiving receptor. Evidence of sediment-laden runoff, visible pollution, failure or bypass of a control measure, or monitoring results indicating unsatisfactory suspended solids or other pollutants will require an immediate review of the source and pathway. The contractor must then amend the drainage or settlement arrangements, repair or replace the relevant control, suspend the activity where necessary, or introduce additional treatment. Table 5 expressly identifies additional settlement and the use of flocculants where appropriate as available corrective measures.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Section 6 of the **Outline CEMP [REP3-092]** provides the wider escalation and close-out process. The Environmental Manager will be present throughout construction and when new activities commence, undertake walkover surveys and record departures from the detailed CEMP. The Applicant must be notified of identified deviations. Required actions will be entered on an Environmental Action Schedule, agreed with the Site Manager for programming and issued weekly for implementation. Formal inspections and audits will then verify that the corrective action has been completed and remains effective. The detailed Water Management Plan will specify the monitoring locations, parameters, frequency, trigger criteria, responsible personnel and response actions for each relevant working area once the construction activities,

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				temporary drainage arrangements and receiving receptors are confirmed. These details must be approved as part of the detailed CEMP before the relevant construction stage commences. The **Outline CEMP [REP3-092]** is certified under Schedule 13 of the **Draft Development Consent Order [REP3-005]**. **Requirement 13: Construction Environmental Management Plan** requires the detailed CEMP to be prepared substantially in accordance with it, approved by the relevant planning authority and implemented throughout construction. The monitoring, response and corrective-action process is therefore secured and enforceable through the DCO.
WC-025	Description and DCO Process	Outline CEMP	1.25. Overall, the Outline CEMP provides a framework for managing flood risk, water quality, and silt; however, at this stage it lacks sufficient detail and quantified evidence to demonstrate	The **Outline Construction Environmental Management Plan (CEMP) [REP3-092]** contains the information required to secure construction mitigation at the DCO stage. The final temporary

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			that construction activities will not increase flood risk or adversely affect water environments.	drainage layout, treatment capacity, monitoring locations and construction sequencing cannot be completed until the active working areas, temporary catchments and contractor methodology have been defined. The underlying assessment is provided in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP3-015]**, the **FRA and Drainage Strategy suite [REP3-039, REP3-049, REP3-051, REP3-053, REP3-055, REP3-057, REP3-059, REP3-061 and REP3-063]** and the **Water Framework Directive Assessment [REP1-094].** These documents identify the relevant flood sources, drainage pathways, water receptors and construction water quality risks. Table 5 of the Outline CEMP fixes the minimum construction controls for temporary drainage, attenuation and settlement, silt management, water quality monitoring, discharge

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				controls, spills, washdown, concrete works, flood response, dewatering and protection of land drains and watercourses. Sections 5 and 6 establish responsibility, monitoring, inspections, auditing, record keeping and corrective action. Those measures are secured through the following DCO mechanism: The **Outline CEMP [REP3-092]** is a certified document under Schedule 13 of the **Draft Development Consent Order [REP3-005]**. Requirement 13 requires the detailed CEMP to be prepared substantially in accordance with the certified Outline CEMP and approved by the relevant planning authority before the relevant construction stage commences. The construction stage must then be carried out in accordance with the approved detailed CEMP.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				This is the appropriate outline-to-detailed process for an NSIP where the temporary construction works are not fixed at the application stage. It provides control over the final detail without requiring temporary drainage systems to be designed against assumed working areas that may not reflect the eventual programme. Quantitative drainage assessment has been undertaken where the infrastructure and contributing catchment are fixed or sufficiently defined. For temporary construction works, the Outline CEMP requires storage and treatment to be sized for the actual contributing area once that information is available. The Council has not identified a specific construction flood pathway, water receptor or pollution control that falls outside the scope of the assessment or the secured detailed CEMP process. The

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Applicant considers that the submitted assessment and DCO controls provide sufficient certainty that construction will not increase flood risk or result in adverse effects on the water environment.
WC-026	Description and DCO Process	Outline CEMP	1.26. Additionally, the council wishes to highlight that it believes that the reference to "Anglian Water" in bullet point 2 on Page 28 of Table 5 should be to "Wessex Water" instead. The Applicant is asked to consider this and amend as necessary.	The Applicant agrees that the reference to "Anglian Water" should be to "Wessex Water". This will be corrected in the next revision of the **Outline Construction Environmental Management Plan (Rev 5) [EN010168/APP/7.12]** submitted at Deadline 4.
WC-027	Description and DCO Process	General	2. Statement of Commonality (Rev 3) [REP2-023] 2.1. The council notes that not all of its comments in its Comments on Submissions received at Deadlines 1 and 1A [REP2-048] have been addressed in this 5 iteration, although acknowledges that both documents were submitted at the same time.	The Applicant notes that in the **Wiltshire Council Comments on Submissions received at Deadlines 1 and 1A [REP2-048]** highlighted errors in the Table 3 List and Status of SoCGs with Air Quality marked in Amber instead of Green, and Noise and Vibration being Green instead of Amber. This error was also brought to the Applicant's attention in a meeting on 12 May 2026 and was corrected before Deadline 2 (**8.1 Statement**

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				of Commonality (Rev 3) [REP2-023]). The Applicant was unaware of the comment regarding the lack of status recorded for Glint and Glare and BESS fire suppression in Table 3 List and Status of SoCGs until the receipt of **Wiltshire Council Comments on Submissions received at Deadlines 1 and 1A [REP2-048]** after Deadline 2, however this has now been addressed in **8.1 Statement of Commonality (Rev 4) [REP3-110]**.
WC-028	Description and DCO Process	Topic Specific Meetings	2.2. However, under Section 4.2, and specifically paragraph 4.2.1, the Applicant states the matters recorded in the SoCG have been discussed through targeted meetings on specific topics, as well as monthly steering group meetings between the Applicant and Wiltshire Council. 2.3. The council wishes to highlight that there have not been any topic specific meeting requests received	Landscape representatives for the Applicant attended the Accompanied Site Inspection (ASI) along with Wiltshire Councils (WC) Landscape Officer on the 11th June 2026. During this visit, discussions were held between both parties surrounding the opportunities to undertake further meaningful discussions to further the SoCG and undertake further discussions surrounding any

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			from the Applicant or the Applicant's landscape consultants in relation to any outstanding landscape and visual matters further to the submission of the council's Relevant Representation [RR-4934], Written Representation [REP1-138], Local Impact Report [REP1-137], or initial draft of the SoCG with Wiltshire Council [REP2-025]. No requests have been made by the Applicant during any monthly Steering Group meetings seeking to move forward any specific landscape and visual topic area or matters of disagreement apart from signposting to the various additionally submitted Technical Notes, which the council has already previously provided comment.	outstanding landscape and visual matters. The Applicant has subsequently contacted Officers at WC. The purpose of the Steering Group is for both parties to exchange information in relation to project status, timelines and forward planning therefore providing relevant information across all Wiltshire Council disciplines alongside the opportunity for technical matters to be discussed. Prior to each Steering Group meeting, the Applicant has provided Wiltshire Council with the opportunity to add any agenda items or technical discussion points they wish to raise, with a view to relevant consultants from the Applicant being available. Where Wiltshire Council has raised specific matters to discuss, the Applicant has sought to address those matters at each Steering Group meeting or through follow up actions.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
WC-029	Description and DCO Process Ecology and Biodiversity	SoCG with Natural England	3. Statement of Common Ground with Natural England [REP2-026] 3.1. It is evident from a review of the Statement of Common Ground (SoCG) with Natural England, and Table 2-1: Summary of engagement therein, that there has been substantial engagement and communication with Natural England (NE). 3.2. It is noted that in Table 2-1: Summary of engagement, against the date of 27 February 2025, it is stated: "A lower survey effort was considered reasonable for Cable Route Corridor, although once habitat surveys have been completed, this conclusion can be better informed." 3.3. It is unclear, however, from a review of the SoCG whether this topic was discussed again in a meaningful way between the Applicant and NE once the habitat surveys within the CRC were complete. This is pertinent as Wiltshire Council has consistently requested appropriate level of	The Applicant notes the Council's comment. Using baseline habitat information collected during habitat surveys across the CRC, the Applicant has adopted a proportionate approach to ecological assessment. Where it could be demonstrated that significant adverse effects on ecological features could be avoided through embedded mitigation, or appropriately avoided through secured measures, detailed species-specific surveys were not considered necessary. This approach was informed by the assessed suitability of habitats to support protected and notable species as well as the nature and scale of the proposed works within the CRC. Through consultation with Natural England, the Applicant identified appropriate avoidance and mitigation measures to ensure that significant adverse effects on bat species associated with the Bath

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			survey within the CRC for protected species to ensure a comprehensive ecological baseline has been established, and then the council subsequently raised concern regarding the lack of survey actually undertaken within the CRC. The SoCG implies that NE had intended that the need for further / Phase 2 survey within the CRC would be re-discussed and appraised following completion of the habitat surveys. However, the impression that has consistently been given to Wiltshire Council is that it had been decided from the outset that there would be no further ecological survey / Phase 2 survey / species-specific survey within the CRC and there seemed to be no inclination to move from this position.	and Bradford-on-Avon Bats Special Area of Conservation (SAC) would be avoided. On the basis of the agreed avoidance and mitigation measures, and having regard to the habitats present and the nature of the proposed works, further detailed bat surveys were not considered necessary to inform the assessment of effects, consistent with the approach outlined above.
WC-030	Ecology and Biodiversity	Environmental Surveys	3.4. Section 3.4 Ecology and Biodiversity of the SoCG includes Table 3-3: Ecology and Biodiversity, and under reference 3.3.6 in the table, which pertains to the 6 sub-topic of 'Assessment –	The Applicant notes this comment and confirms that discussion is ongoing with Natural England on outstanding matters yet to be agreed.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			General' it states: "Natural England's advice is that in relation to issues within its remit there is a number of areas where the Applicant has not provided sufficient evidence to demonstrate that the project will not result in significant adverse impacts on the natural environment." 3.5. This is noteworthy as it concurs with the view of Wiltshire Council.	
WC-031	Ecology and Biodiversity	Great Crested Newt Surveys	Great Crested Newt (GCN) 3.6. It is evident from a review of the SoCG that along with Wiltshire Council, Natural England also has outstanding concerns regarding the Applicant's intended approach with respect of GCN at the Solar PV Sites as it is detailed under reference 3.3.12 of Table 3-3: Ecology and Biodiversity of the SoCG: "Natural England has outlined its position on European protected species and is seeking further	The Applicant notes this comment and confirms that discussions with Natural England regarding mitigation for great crested newts at the Solar PV Sites have progressed. Natural England confirmed by email on 29 June 2026 that it had reviewed the **Outline Ecological Protection and Mitigation Strategy (oEPMS) [REP3-102]** and that all outstanding matters relating to great crested newts have been resolved and agreed.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			information on potential impacts. This includes details of habitat clearance, badger survey methodology, mitigation for impacts on great crested newt (GCN) habitat related to the solar PV site, and evidence of engagement with Natural England where protected species licences may be required. To date, no draft protected species licence applications have been submitted for review. Natural England advise that further evidence is required to assess the potential effects and sufficiency of mitigation in relation to protected species. Natural England is not satisfied that sufficient evidence has been provided to demonstrate that the project will not result in significant adverse effects to protected species." 3.7. It is also stated against reference 3.3.16 in Table 3-3: Ecology and Biodiversity of the SoCG: "Survey effort to date is likely sufficient to support entry into the	Details of the avoidance and mitigation measures designed to avoid significant adverse impacts on this species are set out in Method Statement 13 of the **oEPMS [REP3-102]**.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			District Level Licensing scheme, though updated surveys may be needed if there is a long delay before consent. The proposed DLL approach for cable route impacts is considered appropriate; however, mitigation for Solar PV sites is less clear. While timing of works and pond buffers are welcomed, further consideration is needed for impacts to terrestrial, connective, and foraging habitats, particularly within 50m of ponds, where additional mitigation and licensing may be required." 3.8. For more information, please refer to Wiltshire Council's comments on The Applicant's Response to Written Representations [REP2-039] under the reference of WC-062.	
WC-032	Ecology and Biodiversity	Habitats Regulations Assessments	Habitats Regulations Assessments (HRA) and the Bath and Bradford-on-Avon Bats Special Area of Conservation (SAC) 3.9.	The Applicant notes this comment. An updated **8.4 Statement of Common Ground with Natural England [REP3-112]** was submitted at Deadline 3. Reference 3.3.7 in Table 3-3 has

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			It is noted from the entries against 19 February 2026 and 18 May 2026 in Table 2-1: Summary of engagement of the SoCG, that the Applicant and NE have reached an agreement for the HRA to be revised and resubmitted at Deadline 3. This is because NE requires the Applicant to assess Lime Down C as 7 potentially representing functionally linked land (FLL) for lesser horseshoe bats associated with the Bath and Bradford-on-Avon Bats SAC. 3.10. Nevertheless, before the agreement was actually reached to revise the HRA as aforementioned and whilst there was an ongoing disagreement on this matter, the 19 February 2026 entry in Table 2-1 specifies that "…both parties agree mitigation is sufficient to conclude no significant adverse effects will likely occur on this species and therefore on the SAC."	now been updated to confirm agreement with both parties on this topic. The Applicant disagrees with the view that the same level of survey is required for land considered to be FLL within Lime Down C as well as land within the CRC (where it coincides with the greater horseshoe consultation zone around the Box Mine component of the SAC). This is due to the considerably lower level of impacts in terms of magnitude and duration of works within the CRC compared with land at the Solar PV Sites. An updated **Habitat Regulations Assessment Report [REP3-090]** was submitted at Deadline 3 and full agreement on the conclusions of the HRA Report has been reached between the Applicant and Natural England. The HRA Report concludes that the Scheme will not result in significant adverse effects on the Bath and Bradford-on-Avon SAC

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			This extract from table 2-1 doesn't seem to align with the statement in Table 3-3 under reference 3.3.7 in relation to the same matter of FLL for lesser horseshoe bats, as it states that NE's position is as follows: "Natural England is not satisfied that it can be excluded beyond reasonable scientific doubt that the project would not have an adverse effect on the integrity of the Bath and Bradford on Avon." 3.11. Whilst the requirement of NE for the Applicant to assess land within Lime Down C as FLL for lesser horseshoe bats is welcomed by Wiltshire Council, the council would have expected the same level of survey and assessment to have been required in relation to the confirmed greater horseshoe consultation zone around the Box Mine component of the SAC that coincides within the CRC, and for surveys to have been required and conducted within key habitats in this area of FLL to ensure a robustly robust and accurate HRA.	

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			It is noted that in Table 3-3 under reference 3.3, NE's position on this matter is stated as follows: "For the Bath and Bradford on Avon Bats SAC, Natural England agrees that the solar PV site itself is not functionally linked land for greater horseshoe bats. However, the cable route corridor lies within an impact zone and could be functionally linked, meaning likely significant effects cannot be ruled out due to potential loss or fragmentation of commuting habitat. Impacts relating to loss of roosts, killing, or injury of greater horseshoe bats can be screened out."	
WC-033	Socio-Economics, Tourism and Recreation	Employment	4.1 Applicant's Response to the Local Impact Report [REP2-038] Economic and Regeneration 4.1. The council notes the Applicant's confirmation that the uplift in employment opportunities will be substantial for a short time, but that in the longer term the scheme will have a negative effect on employment prospects in the	The Applicant notes and confirms Wiltshire Council's interpretation. The Applicant reaffirms its commitment to mitigating adverse effects on local employment through the measures secured in the **Outline Skills Supply Chain and Employment Plan [REP3-104]**.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			area. The local skills training scheme will help mitigate this.	
WC-034	Socio-Economics, Tourism and Recreation	Economic Impact	4.2. The council also welcomes the clarification of the economic impact on the local area – earlier iterations submitted by the Applicant were to the council's mind obtuse. The council would also like to thank the Applicant for providing an estimate of the likely business rates that might be paid as a result of this scheme but would point out that this does not have any influence on the council's position.	The Applicant notes this comment but affirms that all related assessment information was submitted in **ES Volume 1, Chapter 16: Socio Economics, Tourism and Recreation [APP-068]** upon submission of the DCO in September 2025. The Applicant provided business rates estimate to supplement the Council's understanding of who beneficiaries of long-term economic benefits would include.
WC-035	Socio-Economics, Tourism and Recreation	Economic Impact	4.3. The council disagrees with the Applicant's assertion that the economic impact will be adverse rather than significant in the local area during the construction phase. However, the monitoring of local businesses during the scheme, as suggested by the council and agreed by the Applicant, will provide evidence to prove this and help to inform any subsequent similar schemes in the UK. The council also considers that	The Applicant does not consider the adverse impacts to tourism during construction as significant, as the likely worst-case employment loss is less than 0.7% of tourism-based employment within 5 km of the Scheme, and approximately 0.17% of tourism employment across Wiltshire. This is less than 1% in either area, and as based on the assessment metrics in **ES Volume 1, Chapter 16: Socio Economics, Tourism**

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			a business compensation scheme, agreed prior to permission for this scheme being granted, would help to mitigate the economic impact of the scheme during periods of construction and decommissioning.	**and Recreation [APP-068]** at Table 16-5 this is therefore a "low" magnitude of change. The Applicant considered that the tourism industry in Wiltshire is best described as of "medium" sensitivity (as set out in Table 16-3 **[APP-068]**) due to its importance in policy, the presence of specific tourism destinations (National Landscapes and World Heritage Sites) but that employment in tourism as a proportion of the employment market is not significantly greater than across the South West or Great Britain as a whole. The Applicant considers the matter of monitoring local businesses during the Scheme to remain under discussion and is not yet agreed, as stated in paragraph 4.3 of Wiltshire Council's response.
WC-036	Transport and Access	Traffic Impacts	4.4. The council disagrees with the assertion that there will be no significant effects in respect of transport and access, or that the	The Applicant makes note of this comment. The assessment methodology was undertaken in accordance with ISEP guidance.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			scheme will not significantly increase congestion in the local area. Wiltshire Council Highways team will also be commenting on this assertion.	The Applicant can confirm that the guidelines were followed when undertaking the ES assessment. The methodology used is set out in Section 13.6 in **ES Volume 1 Chapter 13: Transport and Access (Rev 3) [REP3-019].** Further assessments of links which exceeded either Rule 1 or Rule 2 was then undertaken. conclusions of non-significant effects were reached following specific assessment in relation to the required transport considerations including: • Severance; • Driver Delay; • NMU delay; • NMU amenity; • Fear and intimidation; • Road user and pedestrian safety; and • Hazardous/large loads Please could the council provide its analysis of the significance of effects including congestion.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
WC-037	Cultural Heritage	Archaeology	Archaeology 4.5.The council notes the Applicant's response that there are potential positive impacts from taking archaeological remains out of regular cultivation. The council considers that although there may be a theoretical potential benefit, this has not been demonstrated in detail on this particular scheme to the level of detail that the council would need in order to consider it a benefit.	The Applicant refers WC to Paragraph 3.10.101 of NPS EN-3, which states solar PV developments may have a positive effect where archaeological remains are protected from agricultural activity.
WC-038	Cultural Heritage	Archaeology	4.6. Similarly, there is a difference of views with the Applicant over the impacts of the operational phase. The council has concluded the benefits are neutral, but the Applicant consider them to be positive. The council's view is that the public benefits of the proposed public engagement programme to help to neutralise or off-set the archaeological damage that will be done by the need to excavate some archaeological features and site, therefore the overall effect is neutral rather than positive.	The Applicant considers this enhancement of the archaeological record and the delivery of public engagement to have a potential positive effect on our understanding of the archaeological resource and regional archaeological research objectives.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
WC-039	Transport and Access	Traffic Impacts	Highways and Transport 4.7. With regards to the Negative Impacts – Construction Phase, and specifically regarding HGV Passage, the council's comments on the latest Transport Assessment (Rev 2) were submitted at Deadline 2 [REP2-048]. This response included detailed comments on the swept path analysis undertaken to two 16.5m HGVs in Annex K. The Applicant's response makes the arguments that: •The proposed booking system set up to manage HGV arrivals and departures will be able to hold back any HGV cross-over, should there be any delays on the roads. This will prevent HGVs generated by the Scheme passing each other in opposite directions on the local roads forming part of the construction routes. •Annex K, to the revised Transport Assessment, demonstrates there is adequate carriageway width and / or passing place opportunity for	The Applicant doesn't state that the booking system will completely remove the probability of two HGVs meeting. The booking system helps to reduce the probability of two HGVs meeting and is a standard element of most construction projects. The Applicant has submitted locations along construction routes showing two HGVs passing in Annex K of **ES Volume 3 Appendix 13-1: Transport Assessment (Rev 3) [REP3-065]**. As requested, the drawings now include road width geometry at the passing places, which demonstrate at least a 5.5 metre road width to allow two HGVs to pass, as specified by Wiltshire Council. The council considers that additional works to accommodate two-way HGV passage on the rural lanes outside the Alderton Road HIA are required For clarity, the Applicant is proposing widening along Fosse Way, which is outside of the HIA works on Alderton Road,

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			two HGVs along the construction routes outside any of proposed bespoke Highway Improvement Areas such as Alderton Road. •In conclusion, no mitigation measures outside of those proposed already will be needed of be put in place to improve passage opportunities for two HGVs. Reasoning stated is that excessive widening of existing rural routes to allow two HGVs to pass would be over engineering, and unnecessary due to the temporary nature of the construction period and what the Applicant considers to be low numbers of daily HGV movements. 4.8. The council does not consider the risk of two opposing HGVs meeting can be totally removed by the booking system. Furthermore, the council does not consider that additional works to accommodate this 2-way HGV passage on the rural lanes outside the Alderton Road HIA works set out now within Annex I to the Transport Assessment aren't required.	as shown in Annex K of **ES Volume 3 Appendix 13-1: Transport Assessment (Rev 3) [REP3-065]**. Further details of the proposed highway improvement works are included in Annex K of **ES Volume 3 Appendix 13-1: Transport Assessment (Rev 3) [REP3-065]**.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
WC-040	Transport and Access	Traffic Impacts	4.9. With respect to the damage consequences to the local highway network, the Applicant refers to the Outline Construction Traffic Management Plan [REP1-112], and the additional wording amendments included at Deadline 1 to make the process for remediation of road damage during the construction phase clearer. Where immediate repairs are required during the construction phase for safety reasons, the Outline CTMP [REP1-112] now expressly requires these to be undertaken at the time. This is welcomed, but the council preference is still a formal s59 Agreement defining the full extent of the local network to be covered by highway condition surveys, the timing of these and the form they should take and an Applicant acceptance that the trafficking introduced onto the rural lanes included during the construction phase is wholly extra-ordinary as	As set out in the **Applicant's Response to Comments Received at Deadline 2 [REP3-129]**, (response SLD-082) section 59 of the Highways Act 1980 allows recovery of "excess expenses" for maintaining a highway due to "extraordinary traffic." However, the Applicant does not consider that an additional DCO Requirement for a formal section 59 Agreement is required, as road condition surveys and rectification are already secured through the Construction Traffic Management Plan (CTMP) process. The final CTMPs, which must be substantially in accordance with the **Outline CTMP [REP3-109]**, are secured through Requirement 15 of Schedule 2 to the **Draft Development Consent Order (DCO) [REP3-005].**

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			defined by s59 of the Highways Act.	
WC-041	Transport and Access	HGV Volumes	4.10. With regards to the HGV Volumes, there is still some clarification sought on these estimates following DCO application document review. This includes the latest Transport Assessment (Rev 2) [REP1-057 and REP1-059]. The Applicant refers to the inclusion of this revised Transport Assessment within the Deadline 1 suite of documents. Highway and transport comments were made as part of the Wiltshire Council Deadline 2 submission [REP2-048]. The council's comments are not re-iterated here but suffice to say that aspects of the Annex E calculations still need verification. For example, the supporting calculations undertaken to derive the number of PV Modules and Mounting Structures for each Lime Down site have not been fully provided or verified by evidence from existing solar farm sites.	The Applicant makes note of this comment. The calculations undertaken to derive the number of PV Modules and Mounting Structures for each Lime Down site were based on indicative site layouts and contractor information. In addition, an allowance has been made for off-site disposal of excavated spoil. Further clarification has been provided in Annex E of **ES Volume 3, Appendix 13-1: Transport Assessment (Rev 3) [REP3-066]** submitted at Deadline 3.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			Another example would be the council's concerns over the HGV allowance made for off-site disposal of excavated spoil (see comments on Applicant's Response to Written Representations [REP2-039] below).	
WC-042	Transport and Access	Protective Provisions	4.11. Furthermore, with regards to the ability to control design and execution of highway works under conferred DCO powers, the council notes that the now issued Draft Protective Provisions document for 'The Protection of the Local Highway Authority' is noted in the Applicant's response. This document is under review by highway officers in Development Management, Network Management and the Area Highway Team (Maintenance). The council has reasonable confidence that a suitable form of these provisions can be successfully agreed for inclusion in Schedule 15 to the DCO.	The Applicant notes this comment and welcomes Wiltshire Council's reasonable confidence that protective provisions will be agreed for the protection of the local highway authority. The Applicant notes that Wiltshire Council's comments on the draft protective provisions shared were received on 12 June 2026. The Applicant has provided a revised draft to Wiltshire Council on 30 June 2026 and awaits its comments.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
WC-043	Socio-Economics, Tourism and Recreation	Public Rights of Way	Public Rights of Way 4.12.The council's preference is that the Public Right of Way contribution is secured through a Section 106 Agreement rather than through a Community Benefit for express clarity and committed funds to be provided to mitigate the impacts of the scheme. It is noted that this is something that is also flagged up by the ExA within their Written Questions at GCT1.2, and highlights the need for the consideration of index linking and that the Applicant's position on this matter ignores the potential displacement of users to PRoW outside of the Order Limits and the benefit of creating new PRoW routes to help to link up to PRoW within the Order limits. 4.13. The council notes that the Applicant's response to Table 5-1 as considered above, seems a departure from what the Applicant has stated in its response to Table 17-1, where it states: "the Applicant considers the request for additional	The Applicant acknowledged the Council's comment and refers to the Applicant's own response to this question set out at GCT1.2 in **The Applicant's Response to the Examining Authority's First Written Questions [REP3-128].** Within the response the Applicant has confirmed the intention for the agreed approach to monitoring contributions will include an index linking mechanism. The Applicant has undertaken an additional technical note to detail likely displacement on the PROW network as a result of the Scheme. The **Technical Note on Alternative Access to the Public Rights of Way Network [EN010168/EXAM/9.46]** has been submitted at Deadline 4. The Applicant seeks to clarify that it is still considering the most appropriate mechanism for delivering on financial contributions to PRoW mitigation measures that

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			contributions towards the wider PRoW network in relation to the Scheme via a Section 106 Agreement, to be something that should be explored further in consultation with Wiltshire Council".	cannot be directly undertaken as part of the Scheme. The matter of displacement on the PRoW network, as raised by Wiltshire Council, the ExA, and at Deadline 3 the Cotswold National Landscape Board, is central to this discussion. The Applicant confirms that where additional improvements and enhancements to the PRoW network have been requested that go above and beyond directly mitigating effects from the Scheme, it is deemed most appropriate that these are delivered through the Community Benefit Fund. The Applicant agrees that the financial contribution of £20,000 per annum, and that this is index linked, are appropriate for delivering upgrades to PRoWs. Updates on discussions between the Applicant and Wiltshire Council's Countryside Access Team have been submitted at Deadline 4 in the updated

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Statement of Common Ground with Wiltshire Council [EN010168/APP/8.2].
WC-044	Landscape and Visual	Landscape Impact	Landscape and Visual 4.14. The Applicant's response in respect of Overview and commentary in relation to compliance with Development Plan Policy CP51 (Landscape) and CP42(i) (Standalone renewable energy installations) is noted. However, the council maintains its view that harmful adverse landscape effects are understated, while beneficial positive landscape effects are overstated within the ES LVIA. The council fundamentally disagrees that significant adverse effects to the character of the landscape are only short-term as a result of the changed land use and introduced energy generating and storage infrastructure.	The Applicant notes the concerns raised but does not agree that the **ES Chapter 8: Landscape and Visual Impact (LVIA) [APP-060]** understates adverse effects and overstates beneficial effects. The LVIA is supported by extensive consultation, iterative design refinement, detailed receptor-based assessment, additional visual testing and transparent professional judgement. A Technical Note on Landscape Fabric and Landscape Character **[REP1-121]** was submitted by the Applicant to set out the approach undertaken to the assessment of Landscape Fabric and Landscape Character used in the LVIA. **REP1-121** provides clarification on the Methodology used in the LVIA to assess the effects of the Scheme

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				on Landscape Fabric and Landscape Character and clarifies that the assessment on Landscape Fabric is an independent and separate assessment to that undertaken on the effects of the Scheme on Landscape Character. The LVIA fully and transparently acknowledges adverse effects to both Landscape Character and Visual Amenity as a consequence of the Scheme whilst also identifying embedded mitigation and long-term 'legacy landscape' restoration measures. The **LVIA [APP-060]** takes into account the effects on landscape character and visual amenity in detail and acknowledges that there would be there would be an immediate change to the character of the Sites themselves and their immediate surroundings as they change from an area of arable farmland to solar infrastructure.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				However, the introduction of the solar arrays and other associated infrastructure would not become a defining feature on the landscape once operational (e.g. at year 1 and year 15). The LVIA recognises that there are Moderate Adverse (Significant) effects to Landscape Character as a result of the Lime Down Scheme at Year 1 of operation, with effects reducing as a result of the maturing embedded mitigation measures by Year 15. However, the LVIA does not claim that these should be considered 'Short Term'. The LVIA Methodology **[REP1A-006]** sets out at para 1.6.19 under 'Duration and Reversibility of the Landscape Effects' that a duration of 10 – 40 years (or longer) is considered Long Term. Para 1.7.27 of the LVIA sets out that: *"For the purposes of the LVIA process, the operation phase of the Scheme is*

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				of long term duration and the construction and decommissioning phases of the Scheme are both of short term duration."
WC-045	Landscape and Visual	Landscape Impacts	4.15. The council considers that there could be some positive landscape fabric benefits in the long-term, see also Wiltshire Council response to the ExA First Written Questions, question LV1.4, but highlight there could also be some long-term adverse effects, as hedgerows will have developed into tree lines, and would need to be coppiced and gapped up to reinstate back to low hedgerows after such a long-time frame. While neutral effects could arise as / if the land is returned to arable farming use by the removal of grassland or other proposed enhancing vegetation during decommissioning and land restoration.	Hedgerow management post decommissioning will be secured within the **Outline Decommissioning Strategy [REP3-096]** as detailed in the **Outline LEMP [REP3-100]**. Following successful removal of panels and associated infrastructure, all hedgerows within the Order Limits will be assessed to consider best ecological and land management practices applicable at the time of decommissioning. Consideration should be given to hedgerow heights, widths, overall plant health, species diversity, landscape character, visual amenity, as well as use by protected or notable wildlife species etc.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				If appropriate at the time, measures to reduce the height of hedgerows to their current would take place during the two-year decommissioning phase and would be programmed to follow the removal of infrastructure to ensure that landscape and visual effects are as assessed in the LVIA. Any cutting to reduce heights of hedgerows would take place outside of the key nesting bird season in line with best practice.
WC-046	Landscape and Visual	Cotswolds National Landscape	4.16. The council considers that the project will harm the setting of the Cotswold National Landscape and causes significant harm to landscape character which cannot be acceptably mitigated. The requirements of policy CP51 and CP42(i) are not satisfactorily demonstrated in the council's view and remain a material planning consideration.	There is no physical overlap between the areas identified for Solar infrastructure within the Scheme and the Cotswolds National Landscape (CNL), and consequently these elements of the Scheme cause no direct impacts on the CNL itself. However, it is accepted that areas within the Order Limits are within the setting of the CNL. In consideration of the above and with reference **ES Volume 3,**

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Appendix 8-6: Assessment of Effects on the Cotswolds National Landscape and its Special Qualities Appendix 8-6 [APP-197] the Applicant has prepared a plan showing the Spatial Extent of Setting of the CNL which is attached. Due to the Scheme's location on the edge of the CNL avoidance measures have been incorporated into the Scheme Design as part of the Mitigation Hierarchy as set out in Section 8.9 of the LVIA **[APP-060]**. This includes: • Avoiding development adjacent to the National Landscape where it would affect its setting; and • Avoiding development where it would be visually intrusive and affect the character and visual experience of the landscape. There were 3 options relating to the how to manage these land parcels. These include:

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				• Option 1 - to remove the entire field from the Scheme; • Option 2 - to maintain hedgerows within the red line boundary and remove the field; or • Option 3 - to retain the whole parcel within the Scheme allowing the opportunity to include positive enhancement measures. Discussion with the Cotswolds National Landscape Board CNLB on these options took place as part of the Consultation process on 24th April 2025 are noted in Table 2: Summary of Engagement Undertaken in **ES Volume 3, Appendix 8.6: Assessment of Effects on the Cotswolds National Landscape and its Special Qualities Appendix 8-6 [APP-197].** Following this consultation, information was received from CNL on positive enhancement measures from CNL's Nature

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Recovery Lead including the provision of wildflower meadows and scrub. Following this and further consultation the Scheme was revised as part of the iterative design process. The following changes were made; • No infrastructure within parcels on the edge of the CNL boundary in the northern part of A1, A11 and A12, B12, C1, C6, C8, part of C9 and the majority of C10. • Parcels C1, C6, C8, C9 and C10 have remained within the Scheme and provide opportunities for positive enhancement measures. • Parcels C2, C3 and C4 which are not on the edge of the CNL but were considered to be within the setting of the CNL, were removed from the Order Limits. The proposals within C1, C6, C8, C9 and C10 do not include mitigation measures to reduce the effects of the Scheme in adjacent

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				parcels. They are distinct enhancement measures which further the purposes of the CNL. These areas within the setting of the CNL have been specifically targeted for positive enhancement to further the purposes of the CNL. As all existing hedgerows within the Scheme are proposed to be strengthened and allowed to grow out to provide landscape and visual mitigation, it was recognised that a different management regime for hedgerows on the edge of the CNL was required to conserve its character and open views. As mitigation of adverse effects is not required on the edge of the CNL due to the offset to infrastructure, maintaining hedgerows at their current height of c1.5m bordering the CNL within Site C was proposed.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				It is agreed that this should not be considered to be a positive enhancement measure but rather a specific management objective to maintain open views of the landscape from the CNL. It was important to distinguish this from the proposal to strengthen and allow hedgerows to grow out to 4.5m across the rest of the Scheme where mitigation of adverse effects are required. The creation of wildflower meadows and margins as well as areas of scrub and new hedgerows as set out within the LEMP are proposed in the northern part of A1, A11 and A12, B12, C1, C6, C8, part of C9 and the majority of C10. These features would be 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 CNLB, the

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				CNL Management Plan and Nature Recovery Strategy and are considered to beneficial landscape improvements which further the purposes of the CNL designation. As noted above, these parcels of land could have been removed from the Red Line Boundary but have been retained within the Scheme to provide positive enhancement. This provides a mechanism for the land to be managed to bring about positive outcomes which will demonstrably add value to the host landscape within the setting of the CNL. 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

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				submissions received at deadline 2 **[REP3-154].** The landscape assessment recorded Moderate adverse effects within the 1 km Local Study Area of the Scheme. However, as stated within the LVIA **[APP-060]** and Appendix 8.6: Assessment of Effects on the Cotswolds National Landscape and its Special Qualities Appendix 8-6 [**APP-197**]. The significant adverse landscape effects within the 1 km local study area are primarily related to the change in land use from agriculture to the solar farm. This change does not directly affect the CNL as the buffer to the development provided by the avoidance measures and layers of proposed mitigation planting contains the development away from the edge of the CNL. As such, the development would be barely discernible from within the CNL itself. Harm to the CNL itself

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				would be minimal, (lasting as long as it takes for the planting to become appropriately established) with beneficial landscape effects within the setting of the CNL having effect in the long term, including as a legacy following decommissioning of the Scheme.
WC-047	Landscape and Visual	Landscape Impact	4.17. With respect to the overview and commentary in relation to the council's view that the overall impact that the overall impact on the unique character of the Limestone Lowland Landscape Character will be significantly negative across all phases of the project, the Applicant's comments noted. The council provides 11 the following comments on each of the primary points included within the Applicant's response as follows. Point 1: Dispersed Nature of the Sites 4.18. The council considers that it is due to the large scale of these individually large sites (A to E) alongside the very long cable route corridor, which together results in	The **LVIA [APP-060]** recognises the adverse effects associated with the proposed high hedgerows required to provide screening of the Array and associated infrastructure. 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 the road and rail infrastructure and the changing topography. The discrete

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			unacceptable landscape and visual change within this receiving landscape and visual context. 4.19. The Applicant highlights that ‘’solar panels are distributed ‘in and amongst’ the landscape features to assimilate them into the landscape.’’ The council considers that the visual mitigation proposed, changes large swathes of existing characteristic hedgerow fabric components impacting character and views across a wide area.	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 assimilate them into the landscape. 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 *“Conserve hedgerows and mature trees, including planting new trees in existing hedges and planting specimen trees in field corners”*), and Wiltshire’s Nature Recovery Strategy which promotes the creation of new grassland and

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				enhancement of existing hedgerows as priorities. On hedgerows (section12.16) Action HDW1g (page 113) states: "*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."* And HDW1h: *"Cut as infrequently as possible."* HDW2a: *"Plant new hedges with a diverse mix of native species."* 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

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Hullavington Rolling Lowland Landscape Character Area. The condition of hedgerows is noted in the description of LCA 16A: Malmesbury-Corsham Limestone Lowlands which states *"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.". Its Strategy is "to strengthen locally degraded elements such as the flailed hedgerows and overgrown stone walls."* The Wiltshire Recovery Strategy provides a framework to reverse biodiversity decline and build resilience across the county's

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				landscapes and was developed under the Environment Act 2021. As 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 strengthening 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.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Hedgerow management post decommissioning will be secured within the **Outline Decommissioning Strategy [REP3-096]** as detailed in the **Outline LEMP [REP3-100]**. Following successful removal of panels and associated infrastructure, all hedgerows within the Order Limits will be assessed to consider best ecological and land management practices applicable at the time of decommissioning. Consideration should be given to hedgerow heights, widths, overall plant health, species diversity, landscape character, visual amenity, as well as use by protected or notable wildlife species etc. If appropriate at the time, measures to reduce the height of hedgerows to their current would take place during the two-year decommissioning phase and would

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				be programmed to follow the removal of infrastructure to ensure that landscape and visual effects are as assessed in the LVIA. Any cutting to reduce heights of hedgerows would take place outside of the key nesting bird season in line with best practice.
WC-048	Landscape and Visual	Landscape Impact	Point 2: Nature of Scheme being 'Overlaid' and Reversible 4.20.The scale of the land use change and the introduction of solar panels and frames, substations, BESS and access tracks 'overlaid' across existing agricultural fields does not alter the fact that this change is significant and adverse.	The scale of land-use change within the boundary of Lime Down Sites A to E is recognised in the **LVIA [APP-060]** within the local 1km Study Area and concludes there are Moderate Adverse (Significant) effects to Landscape Character as a result of the Lime Down Scheme during construction and Year 1 reducing to Moderate Minor Adverse at Year 15 when proposed mitigation has matured. NPS EN-1 recognises at para 5.10.5 that *"Virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape but there may*

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				also be beneficial landscape character impacts arising from mitigation".
WC-049	Landscape and Visual	Existing Landscape Character	Point 3: Strong Framework of Existing Vegetation 4.21.The council highlights that the form and character of existing hedgerows which are maintained at a low level around many fields, are characteristic landscape fabric components that will be physically changed by the proposed management of hedgerows (existing and proposed) at higher levels (4.5m minimum) resulting in enclosing the landscape to reduce and screen views of rolling limestone lowland. 4.22.Existing baseline vegetation outside the DCO Order Limits, which may be important to help integrate the development into the wider landscape, and mitigate visual effects including; existing taller hedgerows, tree stands, shelter belts, plantations, copses and woodlands, cannot be relied	The **LVIA [APP-060]** recognises the adverse effects associated with the proposed high hedgerows required to provide screening of the Array and associated infrastructure. 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 *"Conserve hedgerows and mature trees, including planting new trees in existing hedges and planting specimen trees in field corners"*), and Wiltshire's Nature Recovery

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			upon to be consistently present in the landscape, either through intentional future management actions, or natural loss / decline from disease or poor management over the 60+ year life of the project.	Strategy which promotes the creation of new grassland and enhancement of existing hedgerows as priorities. On hedgerows (section12.16) Action HDW1g (page 113) states: "*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."* And HDW1h: *"Cut as infrequently as possible."* HDW2a: *"Plant new hedges with a diverse mix of native species."* 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

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				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 *"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.". Its Strategy is "to strengthen locally degraded elements such as the flailed hedgerows and overgrown stone walls."*

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				The Wiltshire Nature 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 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 strengthening 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

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				character of the receiving landscape. The LVIA **[APP-060]** 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 **[REP1A-007]** that conforms to the landscape Institutes Guidelines for Landscape and Visual Impact Assessment (GLVIA3) has been used to prepare the LVIA. The LVIA has undertaken a worse case assessment in accordance with the principles of the 'Rochdale Envelope'.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
WC-050	Landscape and Visual	Mitigation	Point 4: The Benefits of Mitigation 4.23.The council considers that mitigation measures are not a benefit of the scheme. Mitigation is highlighted to be necessary to reduce the magnitude of visual effects. Whereas genuine landscape and visual enhancement would be considered a benefit of the scheme. The mitigation to reduce visual effects by allowing existing hedgerows to grow tall to screen development consequently reduces openness and viewers visual depth and interest, impacting views and visual amenity and is therefore not considered to be a benefit. 4.24.The council acknowledges that the scheme includes landscape enhancement by strengthening some existing landscape fabric components i.e. native field boundary hedgerows and planting new hedgerow trees, woodland, riparian corridor planting etc.	The Applicant welcomes WCs acknowledgements of the Landscape fabric benefits associated with the Scheme. The **LVIA [APP-060]** does not identify beneficial effects to Landscape Character associated with the proposed mitigation measures, including the proposed height of the hedgerows within the Order Limits to provide screening of the proposals. Although hedgerows would be managed to 4.5m this is not seen by the Applicant as inappropriate as it is promoted by the Wiltshire Nature Recovery Strategy. The Wiltshire Nature 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. Section 12.16 of the Nature

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Recovery Strategy promotes hedges to be grown out as high hedges provide diverse micro habitats and support small mammals and other wildlife. 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. The Mitigation measures proposed have been identified to minimise adverse visual effects complying with NPS EN-3 by *"minimising the landscape and visual impact"* of the Development. NPS EN-1 recognises at para 5.10.13 that *"All proposed energy infrastructure is likely to have visual effects for many receptors around proposed sites."*
WC-051	Ecology and Biodiversity	Biodiversity Net Gain	Point 5: Biodiversity Net Gain 4.25.The council recognises that delivering BNG is an ecological benefit and positive enhancement	The Applicant welcomes this comment.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			which can influence the condition and character of the receiving landscape resource.	
WC-052	Landscape and Visual Construction and Decommissioning	Receiving Landscape	Point 6: Receiving Landscape 4.26. The Applicant's response includes comments on the landscape and visual section of Wiltshire Council's Local Impact Report [REP1-137] the response references the council's considerations and conclusions of the likely resulting landscape effects upon landscape fabric components, landscape character, and for visual receptors at construction, operation (year 1 & 15) and decommissioning development phases. 4.27. Furthermore, the council would welcome the ExA's suggestion at DCO1.47 in their First Written Questions, that it is necessary for the 7.14 Outline Decommissioning Strategy [REP1-100] to include an Outline Restoration Plan as part of Requirement 20 in Schedule 2 of the draft DCO (Rev 2) [REP1-007].	Hedgerow management post decommissioning will be secured within the **Outline Decommissioning Strategy [REP3-096]** as detailed in the **Outline LEMP [REP3-100]**. Following successful removal of panels and associated infrastructure, all hedgerows within the Order Limits will be assessed to consider best ecological and land management practices applicable at the time of decommissioning. Consideration should be given to hedgerow heights, widths, overall plant health, species diversity, landscape character, visual amenity, as well as use by protected or notable wildlife species etc.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			4.28. The council notes the Applicant's comments where they align with the council's view, but also where they differ to the council's view as included with the LIR [REP1-137]. However, the Applicant's response does not lead the council to change or alter its view over the assessed levels of landscape and visual harms or benefits considered likely to arise for a development of this scale and nature inserted into the landscape at this location and the Council stands by its considerations of landscape and visual matters as included within its LIR [REP1-137].	If appropriate at the time, measures to reduce the height of hedgerows to their current would take place during the two-year decommissioning phase and would be programmed to follow the removal of infrastructure to ensure that landscape and visual effects are as assessed in the LVIA. Any cutting to reduce heights of hedgerows would take place outside of the key nesting bird season in line with best practice.
WC-053	Cultural Heritage	Heritage Assets	Built Heritage 4.29. The council does not agree that there will be "no impact to the character and appearance of heritage assets." 4.30. Whilst the council agrees that the direct impact on the heritage significance of the Grittleton House asset will be localised and time limited, there are also concerns	As stated in **Applicant's Response to the Local Impact Report [REP2-038]** the Applicant has identified that will be no impact to the character and appearance of heritage assets as a result of the installation of cabling. With regards to Grittleton House (NHLE 1022310), the assessment concldes that, whilst the asset has a historic association with some

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			regarding the potential impact on the long-term viability of the business and hence the conservation of the building. Details are set out in the council's comments on 9.22 The Applicant's Response to Written Representations [REP2-039] below.	land within the Scheme, it no longer maintains a relationship with those lands and there would be no harm to its significance or setting arising from the Scheme. The Applicant does not consider it likely there would be a significant adverse effect to the business operations at Grittleton House. This is set out in more detail at 'WC-101' below.
WC-054	Cultural Heritage Transport and Access	Rodbourne Conservation Area	4.31. Furthermore, the Applicant's response refers to the update to the Outline CTMP (Rev 2) [REP1-112] where Paragraph 2.3.2 has been added to respond to concerns regarding the potential for impact on the Rodbourne Conservation Area: "Design of works to the track to the south-west of Rodbourne Road 13 (Works Number 8b) needed to facilitate permanent access to Lime Down E (Work No. 1 to 6 and 9 to 10) will be undertaken in consultation with the Wiltshire Council Conservation Officer and Highway Officer." The council has	The Applicant will continue to discuss highway improvement works to the access track (Works Number 8b) to Lime Down E, which is located to the south of Rodbourne Conservation Area, with WC. The Applicant updated the **Outline CEMP [REP1-096]** (submitted at Deadline 1) to include provision that the WC Conservation Officer should be consulted on the approval of design for the access Works Number 8b. In line with Requirement 15 (Construction Traffic Management Plan) of the **Draft DCO (Rev 3)**

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			commented [REP2-048] that it is unclear what the mechanisms would be for ensuring this occurs, how much ability the Conservation Officer would have to influence the design and / or what would happen if there was any conflict of opinion. Whilst the provision is welcomed and has potential to allow some influence over the nature of the works, it clearly cannot necessarily reduce the potential impact to the character and appearance of the Conservation Area. In addition, it does not provide any commitment to the reinstatement of the rural character of the track and junction following construction or, at worst, at decommissioning.	**[REP3-005]**, the CTMP must be signed off by WC prior to its implementation. As such the Applicant expects the WC Conservation Officer to be consulted by the WC Highways Team prior to the approval of the final CTMP, which will include details on the design, longevity and decommissioning of highway improvements for Works Number 8b.
WC-055	Hydrology, Flood Risk and Drainage	Flood Risk and Drainage	Flood Risk and Drainage 4.32. The Lead Local Flood Authority (LLFA) maintains that: •The Applicant's reliance on outline management plans does not provide sufficient certainty on detailed drainage performance.	The Applicant has responded to the LLFAs concerns in **Hydrology, Flood Risk and Drainage Response to LLFA Comment WC-053 Raised in Deadline 2 Submissions [EN010168/EXAM/9.47]** submitted at Deadline 4.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			•The Applicant's assumption that solar panel areas will remain permeable is not supported by site-specific quantitative evidence. •The limited hydraulic modelling restricts understanding of surface water flow paths and localised flood risks. •A proportionate but broader modelling approach is required to demonstrate no increase in flood risk. •Exceedance flow routing is not consistently demonstrated across the Scheme. •The evidence base does not clearly show how runoff will be managed across all parcels. •Cable route impacts on land drainage systems are not fully resolved. •There is insufficient evidence that trenching / reinstatement will not alter drainage pathways. •The cumulative runoff effects across fields are not adequately assessed.	

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			•Soil compaction risks require further quantitative assessment. •The absence of a defined SuDS strategy limits clarity on long-term management. •The approach to SuDS at decommissioning stage lacks sufficient detail. •There is limited assurance that downstream receptors will not be affected. •Sediment and pollution control relies heavily on management measures. •There is no integrated assessment across construction, operation, and decommissioning. •Hydrological variability is not fully incorporated. •The absence of mapped exceedance pathways reduces confidence. •Drainage mitigation appears procedural rather than design-led. •The impacts on ordinary watercourses are not consistently addressed.	

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

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
WC-056	Hydrology, Flood Risk and Drainage	Flood Risk	4.33. This raises uncertainty in demonstrating compliance with NPS EN-1 requirements to ensure no increase in flood risk. Further site-specific quantitative evidence, modelling (where proportionate), and clear secured design / mitigation measures are required to provide confidence to the LLFA that flood risk will not be increased elsewhere.	The Applicant does not agree that the submitted evidence creates uncertainty regarding compliance with NPS EN-1. The detailed response to the LLFA's individual concerns is provided in **Hydrology, Flood Risk and Drainage Response to LLFA Comment WC-053 Raised in Deadline 2 Submissions [EN010168/EXAM/9.47]**. . NPS EN-1 requires the Flood Risk Assessment to be proportionate to the risk and appropriate to the scale, nature and location of the development. It requires the Applicant to demonstrate that the Scheme will be safe, that surface water will be managed and that flood risk will not be increased elsewhere. It does not prescribe blanket field-scale hydraulic modelling of solar panel areas as the means of demonstrating that outcome. The Applicant has provided site-specific quantitative evidence

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				where the physical mechanism and available information support it. This includes hydraulic modelling at Gauze Brook, further modelling at Gabriel's Well, Manning's calculations for smaller watercourses where proportionate, floodplain displacement calculations, greenfield runoff calculations and attenuation estimates for formal impermeable infrastructure. The site-specific FRA and Drainage Strategy appendices also assess local topography, flood sources, drainage pathways, ordinary watercourses, ditches and downstream receptors. Further information identified in response to FHW1.3 will include revised drainage and overland flow figures, updated Outline Drainage Strategy sections, high-level calculations for fixed or committed infrastructure and conceptual drainage layouts for the BESS and substation locations. These updates improve the presentation

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				and signposting of the assessment but do not change the underlying conclusion. The design and mitigation measures are secured through the **Draft DCO [REP3-005]**. Requirement 11 requires drainage details for the relevant part of the Scheme to be approved before that part commences. Requirements 13, 14, 18 and 20 secure construction water management, operational inspection and maintenance, soil management and decommissioning respectively. The relevant outline management plans are certified documents and the detailed plans must be prepared substantially in accordance with them and implemented following approval. The Applicant therefore considers that the assessment provides the site-specific evidence, proportionate modelling and secured design controls required by NPS EN-1 and demonstrates

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				that the Scheme will not increase flood risk elsewhere.
WC-057	Soils and Agriculture	Food Security	Soils and Agriculture 4.34.Whilst the loss of 5000t/annum of combinable crops, which is at the lower end of possible losses, is not a significant amount in terms of total UK production, the cumulative loss of arable land to infrastructure and housing schemes over time will impact the UK's food security, making us more reliant on food imports. Current and recent events have highlighted the fragility of supply chains, and with climate change having an increasing negative impact on food production worldwide it is becoming increasingly important to preserve our food producing land. Wiltshire Council are supportive of renewable energy in an effort to reduce carbon dioxide emissions but feel there are other forms of renewable energy that are less land hungry and, in some cases,	The Applicant notes the comment on potential impacts of solar development on the UK's food security. As confirmed in the **Applicant's Response to the Examining Authority's First Written Questions [REP3-128]** which also deal with this point, a **Farming and Food Security Technical Note [EN010168/EXAM/9.43]** has been submitted at Deadline 4 to further consider the Scheme's effects on farmland. The Farming and Food Security Technical Note explores relevant government policy and industry guidance; sets UK food security in the context of other considerations from agricultural subsidies to international trade deals; assesses the Scheme in relation to the agricultural land quality across Wiltshire; and provides commentary on cumulative losses

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			more efficient than solar energy that takes up large areas of land.	of agricultural land to solar developments. The Farming and Food Security Technical Note concludes that deployment of the Scheme on marginal grade agricultural land compliments multiple sustainability objectives, including those related to environment, energy, and farm diversification and sustainability. The Report demonstrates that in the context of Wiltshire, the proportion of BMV quality land used by the Scheme is far less than the overall proportion across the county. With regard to alternative forms of renewable energy, details are provided in section 4.10 of **ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056]**. As the Applicant is a solar PV and energy storage developer, no alternative types of low carbon electricity generation have been considered

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				in the development of the Scheme. However, it is considered that the Site would not be suitable for other forms of renewable energy generation at the same scale as the Scheme. For example, due to the Scheme's location away from the coast, tidal power and offshore wind are deemed unviable. The Applicant is supportive of other renewable energy schemes but for reasons described in the **Statement of Need [REP1-085]** maintains that such schemes are needed alongside, rather than as an alternative to, large scale solar schemes such as this Scheme.
WC-058	Soils and Agriculture Construction and Decommissioning	Soil Sampling	4.35. The council are pleased to see more clarity on the soil sampling / bore holes that will be done at the end of the scheme to ensure the land is ready to resume agricultural production. The council also note the requirements for how pollution incidents will be dealt with.	The Applicant notes this comment.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
WC-059	Arboriculture	Schedule 13	Arboriculture 4.36. Schedule 13 lists the documents and plans to be certified and if the Arboricultural Impact Assessment and Outline Arboricultural Method Statement [APP-206] are documents and plans to be relied upon, then it is the council's preference to have them included in Schedule 13 for express clarity and transparency.	The Arboricultural Impact Assessment and Outline AMS are both appendices to the Environmental Statement (see **6.3 Environmental Statement Volume 3, Appendix 10-1 Arboricultural Impact Assessment and Outline Arboricultural Method Statement [APP-206]** and are therefore included as certified documents within Schedule 13 (Documents and plans to be certified).
WC-060	Description and DCO Process	Suggested Requirements	Consolidated List of Suggested Requirements with Reasons 4.37. The council notes that in the vast majority of cases, the Applicant disputes the need for additional Requirements as the Applicant considers that they are or are able to be covered through the discharge of the various Outline Management Plans. The council maintains that additional Requirements and / or strengthening of commitments through additional detail and content within the Outline	The Applicant's position is that any Requirement imposed must satisfy the well-established planning conditions tests — that is, it must be necessary, relevant to planning, relevant to the development to be permitted, enforceable, precise and reasonable in all other respects. Where Wiltshire Council has sought additional or strengthened Requirements, the Applicant has considered each request against those tests and, in the majority of cases, has concluded that the existing

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			Management Plans is required. The Applicant has indicated that the vast majority of the outline management plans will be revised and resubmitted at Deadline 3, and therefore the council reserves comment on whether the amendments sufficiently address the council's identified Requirements until it has had the opportunity to review the updated versions. 4.38. As an example of the above, the Applicant's comments in relation to Table 16-13: Arboriculture suggests that "Arboricultural mitigation is secured through the Outline CEMP [REP1-096] and the Outline OEMP [REP1-098], which are certified documents secured by Requirements 13 and 14 of the DCO and subject to approval by Wiltshire Council. In addition, a pre-commencement Requirement will ensure that no stage of development may commence until the Detailed AMS has been	structure of the DCO — under which detailed versions of the outline management plans must be prepared, submitted to and approved by Wiltshire Council prior to the relevant stage of development — is capable of securing the necessary controls without the imposition of further Requirements. In particular, construction-phase controls are secured through the Detailed CEMP under Requirement 13 (Construction environmental management plan), operational controls through the Detailed OEMP under Requirement 14 (Operational environmental management plan), and decommissioning controls through the Detailed Decommissioning Plan under Requirement 20 (Decommissioning and restoration). The Applicant notes the Council's reservation of its position pending review of the revised outline

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			approved, with all works thereafter carried out in accordance with the approved details, ensuring full control and compliance with BS 5837:2012". With respect to the pre-commencement conditions, the AIA and AMS for all arboricultural works to trees and groups within the solar arrays and cable route, the council's Arboricultural Officers require that the AIA and AMS and all associated plans be submitted as separate appendix to the overarching CEMP / OEMP.	management plans submitted at Deadline 3. The Applicant welcomes that approach and invites Wiltshire Council to confirm, following its review of those revised documents, the extent to which its outstanding Requirements concerns are addressed. Arboricultural mitigation is secured through the **Outline CEMP [REP3-092]** and the **Outline OEMP [REP3-094]**, which are certified documents secured by Requirements 13 and 14 of the DCO and subject to approval by Wiltshire Council. Detailed Tree Protection Plans will be prepared in accordance with BS 5837:2012 and submitted for approval prior to the commencement of development, providing site-specific details of protective fencing locations, specifications and ground protection measures for all retained trees and hedgerows. The Applicant does not intend to submit the Detailed

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Arboricultural Impact Assessment and Arboricultural Method Statement as standalone certified documents, as they are already secured and certified as part of the Environmental Statement.
WC-061	Description and DCO Process Arboriculture	Suggested Requirements	4.39. The Outline Landscape and Ecological Management Plan and ES Figure 3-4 must contain a table of species of tree, size, quantity and location to be provided for mitigated planting within the solar sites post completion of construction. The detail of mitigated planting for the removal of Category U and Category C trees must also be included within the design for replanting.	Mitigation and enhancement measures are detailed in the **Outline Landscape and Ecological Management Plan (OLEMP) [REP3-101]** and the **OEPMS [REP3-103],** which set out habitat creation, species protection measures, buffer zones and long-term ecological management. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the **OLEMP [REP3-101],** is secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order [REP3-005]**. The preparation, approval and implementation of the detailed Ecological Protection and Mitigation Strategy, substantially in

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				accordance with the **OEPMS [REP3-103]**, is secured through Requirement 8 in Schedule 2 of the Draft Development Consent Order **[REP3-005]**. These requirements ensure that ecological protection and enhancement measures are delivered and maintained throughout construction and operation of the Scheme.
WC-062	Landscape and Visual	Response to Written Representations	5. 9.22 Applicant's Response to Written Representations [REP2-039] Landscape and Visual 5.1. With respect to the Applicant's response to WC-002, Wiltshire Council stands by its view that the scheme is fundamentally not landscape led. Instead, the Environmental Statement assesses the impacts of a predetermined site selection rather than demonstrating that landscape considerations informed the choice, scale, or configuration of development. 16 5.2. It has been incumbent on the Applicant to carry out consultations	The **Design Approach Document [APP-268]** (DAD) demonstrates how good design has been embedded in the design of the Scheme and how the design of the Scheme has evolved up to the point of the DCO Application within a clear design framework provided by a Design Vision and Design Principles. The DAD has been prepared in accordance with the Planning Inspectorate's guidance titled 'Nationally Significant Infrastructure Projects: Advice on Good Design' and sets out the design decisions taken at each

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			with the CNL and Wiltshire Council in order to refine the proposals to a certain degree, but this is a part of the normal planning process and not an indication of the scheme being landscape-led.	step of the Scheme's development, and the rationale for these decisions, as well as the mechanisms by which good design will be secured post consent. Design Principle 1 sets out how the Scheme is 'landscape led' and gives due weight to the intrinsic character and beauty of the surrounding countryside. The Scheme has been Landscape-led from the outset, meaning that the landscape itself has been treated as the starting point for the project rather than simply finding space for panels and then mitigating impacts afterwards. The Project Landscape Architect has been engaged on the design of the project from the outset and is identified as the 'Design Champion' for the proposal.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				The landscape-led approach began with a review of the capacity of the landscape to accommodate large scale ground mounted solar development. This lead to an assessment of: • Existing landscape character. • Landform and topography. • Landscape receptors, • Visual receptors and Visual sensitivity. • Settlement pattern and local identity • Public rights of way. • Historic landscape features (supported through consultation with the project Heritage and Archaeology Consultants). • Ecological and Habitat (supported through consultation with the project Ecologists). • Watercourses and floodplains (supported

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				through consultation with the project Hydrologists). The process was to then identify where solar infrastructure could sit comfortably within the landscape and where land should remain undeveloped. Having identified the existing landscape structure, this was then used to organise the solar layout so that the proposals could be read as a series of landscape compartments integrated into the existing countryside. This was embedded into the design of the scheme through the use of a series of buffers. These are set out within Table8-9 of the LVIA **[APP-060]**. Infrastructure associated with the Scheme is located outside of the buffers with the exception of internal access tracks where exclusion from the buffers is unavoidable.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Buffers include extensive offsets from existing PRoW, retention and enhancement of the existing landscape framework to gap up existing hedgerows and provide new tree lines to increase age and species diversity. The embedded mitigation also includes new planting to both mitigate the visual effects of the Scheme and provide landscape benefits including the re-establishment of historic hedgerows within the setting of the CNL, new areas of native woodland, trees, scrub and grassland, new planting within riparian corridors to enhance rivers and wetland, as well the restoration of dry-stone walls and creation of new/reestablishment of historic ponds. The layout has been designed in consideration of the local landscape character to respond to visual receptors in the area such as residents and local settlements,

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				users of PRoW and popular routes including the Fosse Way, the local road network and the CNL. This has resulted in setbacks from local villages, such as at Alderton, Sherston, Foxley, Norton and Rodbourne, avoidance of infrastructure on elevated land or breaking skylines, retention of open foregrounds along PRoW and surrounding residential properties, strategic planting that is aligned to the Rolling Hullavington Lowlands and the Wiltshire Nature Recovery Strategy. The approach with all of these elements has been to design a scheme where the visual effects have been inherently reduced, not just mitigated through additional planting. Mitigation planting has been utilised throughout the Scheme, however, it has been brought forward to provide multifunctional landscapes – which in the regard

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				to a large scale ground mounted solar project is through extensive coordination with the project ecologists to ensure biodiversity, habitat creation and enhancements are integrated into the proposals. The Scheme provides new substantial areas of Green Corridor & Woodland Planting, Enhanced Riparian Native Planting, Hedgerow Reinforcement & Reinforced Road side Vegetation, new hedgerows, Proposed Ponds and Wader Scrapes and extensive areas of ground cover provided beneath the arrays and throughout. The CNL has been proactively considered throughout the design process including the re-establishment of historic hedgerows within the setting of the CNL, new areas of native woodland, trees, scrub and grassland, new planting within riparian corridors to enhance rivers and wetland, as well the

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				restoration of dry-stone walls and creation of new/reestablishment of historic ponds. The layout has considered the Cultural Heritage of the local area as well as historic landscape character, through maintaining views of local churches, landmarks and heritage assets such views of St Gile's Church at Alderton, and the setting of Fosse Lodge on Alderton Road. As a result of the landscape led design development, the areas for the arrays are broken up and separated by substantial areas of agricultural landscape with large areas of land between each of the Sites helping assist with assimilation. The existing field patterns are retained and strengthened. Sensitive land left has been left undeveloped, for example alongside the CNL. Ecological (BNG) and habitat

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				creation at the core of the landscape framework. Public access is maintained and enhanced through additional permissive routes. These all lead to the proposed solar infrastructure appearing as one component within a broader landscape strategy. The design of the Scheme has evolved in response to the outcomes of environmental assessment, stakeholder engagement, consultation feedback at non-statutory, statutory and targeted consultation, and technical studies, within a framework provided by a Design Vision and Design Principles which have sought to minimise adverse impacts, enhance opportunities, and balance flexibility and certainty in the DCO application.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				The landscape led approach to the development has utilised the mitigation hierarchy to minimise adverse effects. Avoidance measures include 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. Embedded mitigation measures principally comprise a range of offsets and buffers and specific landscape design parameters outlined in Tables 7 and 8 of Appendix 8-6. These include extensive offsets from existing PRoW, retention and enhancement of the existing landscape framework to gap up existing hedgerows and provide new tree lines to increase age and species diversity. The embedded mitigation

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				also includes new planting to both mitigate the visual effects of the Scheme and provide landscape benefits including the re-establishment of historic hedgerows within the setting of the CNL, new areas of native woodland, trees, scrub and grassland, new planting within riparian corridors to enhance rivers and wetland, as well the restoration of dry-stone walls and creation of new/reestablishment of historic ponds. Further, significant tree and woodland planting is proposed within the Order Limits as outlined in the **Outline LEMP [REP3-100]**, which will result in the creation of 11.37 ha of new native broadleaved woodland. Locations for planting have been directed by the need for landscaping and visual impact mitigation, but opportunities have also been taken to connect habitat parcels. Once established, this level of woodland

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				planting will result in a significant beneficial effect on the extent of woodland within the Order Limits, which would, by extension, contribute to the connectivity of woodland stands and green infrastructure across the local landscape. The DAD outlines how good design will be secured post-consent through a suite of management plans and requirements in the **Draft Development Consent Order (DCO) [REP3-005]**, including the **Design Principles and Parameters [APP-268]**, the **Outline Landscape and Ecological Management Plan (LEMP) [REP3-100]**, and the **Outline Construction Environmental Management Plan (CEMP) [REP3-092]**. Section 4.2 of the **Design Approach Document [APP-268]** sets out the positive design

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				outcomes of the Scheme to ensure it is sustainable and sensitive to place, including green infrastructure considerations. The Scheme design integrates with the landscape, and where practicable, enhances the landscape and local green infrastructure network, to improve biodiversity and ecological connectivity across the Solar PV Sites. Enhancement measures will contribute to and strengthen the connectivity between a number of the Local Wildlife Sites located close to the Solar PV Sites and the local landscape, through the provision of new hedgerows, tree and woodland planting in the vicinity of the sites, and through the creation of areas of species rich grassland and scrub planting within the Solar PV Sites, which may provide ecological 'stepping stones' for various species within the local, largely arable landscape. The **Design Principles and**

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Parameters [APP-269] sets out the design principles and parameters by which the Scheme has been designed, and the Environmental Impact Assessment has been undertaken. The design principles have informed the parameters which are secured by Requirement 5 in Schedule 2 of the **Draft DCO [REP3-005]** and apply to the detailed design of the Scheme post consent. The Landscape Strategy set out in the **Outline LEMP [REP3-100]** aims to set out the approach to habitat creation and management in order to provide ecological enhancements, strengthen the green infrastructure within the local area, and to provide landscape and visual mitigation through screening of the Scheme. The **Outline LEMP [REP3-100]** draws upon the Draft Wiltshire Local Nature Recovery Strategy and sets out that the Scheme as designed

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				will broadly contribute to these priorities. The **Outline LEMP [REP3-100]** will be secured by Requirement 7 in Schedule 2 of the **Draft DCO [REP3-005].**
WC-063	Landscape and Visual	Response to Written Representations	5.3. With respect to the Applicant's response to WC-002 and WC-020, for the reasons stated in WC-020 the council maintains its stance that the extant Core Policy 51 should be a material consideration in the DCO application decision making process. It also reiterates that the harm to the receiving landscape and visual amenity of the DCO application area of High Landscape Sensitivity and its surroundings, is such that there will be long-term adverse effects which cannot be adequately mitigated and cannot comply with the requirements of CP51.	The Applicant notes WC's position that extant Core Policy 51 should be a material consideration in the decision making process. As previously stated in its responses to WC-002 and WC-020, the Applicant considers that the Scheme complies with Wiltshire Core Policies "CP51: Landscape" and the reasoning is set out in further detail in Annex B – Local Policy Accordance Tables of the Planning Statement **[REP2-017]**. The scale of land-use change within the boundary of Lime Down Sites A to E is recognised in the LVIA **[APP-060]** within the local 1km Study Area and concludes there are Moderate Adverse (Significant) effects to Landscape Character as a result of the Lime Down Scheme during construction

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				and Year 1 reducing to Moderate Minor Adverse at Year 15 when proposed mitigation has matured. NPS EN-1 recognises at para 5.10.5 that *"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".*
WC-064	Landscape and Visual	Landscape Led Approach	5.4. The council sees no evidence that the scheme is landscape led and reiterates its view that what has been provided by the Applicant is not landscape led and cannot be considered so, it is an assessment of a fait accompli in terms of the development sites selected. It is difficult to see how a project informed by a genuine 'landscape-led' approach could reasonably conclude that development of the scale proposed was suitable to be introduced into an accepted high value landscape. A genuine	The Scheme has been Landscape-led from the outset, meaning that the landscape itself has been treated as the starting point for the project rather than simply finding space for panels and then mitigating impacts afterwards. The Project Landscape Architect has been engaged on the design of the project from the outset and is identified as the 'Design Champion' for the proposal. The landscape-led approach began with a review of the capacity

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			landscape led scheme prioritises the existing natural, cultural and topographical features, using landscape character to guide design and location of development and infrastructure without disrupting or dominating the character of the receiving environment.	of the landscape to accommodate large scale ground mounted solar development. This lead to an assessment of: • Existing landscape character. • Landform and topography. • Landscape receptors, • Visual receptors and Visual sensitivity. • Settlement pattern and local identity • Public rights of way. • Historic landscape features (supported through consultation with the project Heritage and Archaeology Consultants). • Ecological and Habitat (supported through consultation with the project Ecologists). • Watercourses and floodplains (supported through consultation with the project Hydrologists).

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				The process was to then identify where solar infrastructure could sit comfortably within the landscape and where land should remain undeveloped. Having identified the existing landscape structure, this was then used to organise the solar layout so that the proposals could be read as a series of landscape compartments integrated into the existing countryside. This was embedded into the design of the scheme through the use of a series of buffers. These are set out within Table8-9 of the LVIA **[APP-060]**. Infrastructure associated with the Scheme is located outside of the buffers with the exception of internal access tracks where exclusion from the buffers is unavoidable. Buffers include extensive offsets from existing PRoW, retention and

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				enhancement of the existing landscape framework to gap up existing hedgerows and provide new tree lines to increase age and species diversity. The embedded mitigation also includes new planting to both mitigate the visual effects of the Scheme and provide landscape benefits including the re-establishment of historic hedgerows within the setting of the CNL, new areas of native woodland, trees, scrub and grassland, new planting within riparian corridors to enhance rivers and wetland, as well the restoration of dry-stone walls and creation of new/reestablishment of historic ponds. The layout has been designed in consideration of the local landscape character to respond to visual receptors in the area such as residents and local settlements, users of PRoW and popular routes

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				including the Fosse Way, the local road network and the CNL. This has resulted in setbacks from local villages, such as at Alderton, Sherston, Foxley, Norton and Rodbourne, avoidance of infrastructure on elevated land or breaking skylines, retention of open foregrounds along PRoW and surrounding residential properties, strategic planting that is aligned to the Rolling Hullavington Lowlands and the Wiltshire Nature Recovery Strategy. The approach with tall of these elements has been to design a scheme where the visual effects have been inherently reduced, not just mitigated through additional planting. Mitigation planting has been utilised throughout the Scheme, however, it has been brought forward to provide multifunctional landscapes – which in the regard to a large scale ground mounted

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				solar project is through extensive coordination with the project ecologists to ensure biodiversity, habitat creation and enhancements are integrated into the proposals. The Scheme provides new substantial areas of Green Corridor & Woodland Planting, Enhanced Riparian Native Planting, Hedgerow Reinforcement & Reinforced Road side Vegetation, new hedgerows, Proposed Ponds and Wader Scrapes and extensive areas of ground cover provided beneath the arrays and throughout. The CNL has been proactively considered throughout the design process including the re-establishment of historic hedgerows within the setting of the CNL, new areas of native woodland, trees, scrub and grassland, new planting within riparian corridors to enhance rivers and wetland, as well the

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				restoration of dry-stone walls and creation of new/reestablishment of historic ponds. The layout has considered the Cultural Heritage of the local area as well as historic landscape character, through maintaining views of local churches, landmarks and heritage assets such views of St Gile's Church at Alderton, and the setting of Fosse Lodge on Alderton Road. As a result of the landscape led design development, the areas for the arrays are broken up and separated by substantial areas of agricultural landscape with large areas of land between each of the Sites helping assist with assimilation. The existing field patterns are retained and strengthened. Sensitive land left has been left undeveloped, for example alongside the CNL. Ecological (BNG) and habitat

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				creation at the core of the landscape framework. Public access is maintained and enhanced through additional permissive routes. These all lead to the proposed solar infrastructure appearing as one component within a broader landscape strategy.
WC-065	Landscape and Visual	Response to Written Representations	5.5. The Applicant's response with respect to WC-021 through WC-031 provides no additional evidence to allay the council's concerns that the distinctive rural landscape of high value and high sensitivity of this section of the Fosse Way route and the setting of the CNL will be industrialised for a period of 60+ years creating a potentially irreversible change to the character and visual amenity of the landscape. The Applicant's ES LVIA has consistently downplayed the significance of effect of the development proposals on the Fosse Way.	The **LVIA [APP-060]** undertook an assessment of the potential visual impacts to users of the Fosse Way as well as an assessment of potential effects on Landscape Character associated with the Scheme. The LVIA accepts that there are Moderate Adverse effects on the visual amenity of users of the Fosse Way as a result of the Scheme as set out within **ES Volume 3, Appendix 8-3-2-2 LVIA Assessment Sheets (Significant) [REP3-044].**

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				The LVIA considered the cumulative landscape effects of the Scheme within the 10km Study Area. However, the LVIA used a 2km Study Area to assess visual effects, and so the 10km Cumulative Study Area was restricted to record Cumulative Landscape Effects only. At the request of Wiltshire Council, a **Technical Note on Cumulative Sequential Visual Effects [REP1-123]** was submitted at Deadline 1 which considers the cumulative sequential visual effects of the scheme within the 10km Study Area. Sequential effects on users of the Fosse Way were assessed in relation to the 3 existing installations at Newton Airfield, and sequential effects on users of the A429/A350 in relation to the existing Rodbourne Rail solar farm and three proposed solar schemes including Bishoper Farm Solar

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Scheme (west of Charlton Park), the proposed scheme to the north of Rodbourne Rail solar Farm, and Red Barn north east of Kington St Michael (to the south of the M4. The assessment concluded there no additional Significant Adverse Sequential Effects on the amenity of users of the Fosse Way. At the request of the ExA, for Deadline 4 the Applicant has agreed to undertake an assessment of Sequential Visual Effects on the Wiltshire Cycleway within the 10km Study Area, which in part utilises the Fose Way. The Applicant wishes to express that having undertaken an assessment of sequential effects on the Fosse Way and the A429 and the A350 routes as requested by Wiltshire Council and provided at Deadline 1 as **Technical Note on Cumulative Sequential Visual Effects [REP1-123]**, it is their professional opinion that the

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				assessment on the Wiltshire Cycleway is likely to conclude similar effects as to those set out within the **LVIA [APP-060]** (as set out within **ES Volume 3, Appendix 8-3- 2-2 LVIA Assessment Sheets (Significant) [REP3-044]**) which recognises that there would be Moderate Adverse effects on the visual amenity of users of the minor roads and the Fosse Way which make up the Wiltshire cycleway.
WC-066	Landscape and Visual	Response to Written Representations	5.6. In respect of WC-021 to WC-024, it is considered by the council that the entire route of the Fosse Way through the DCO application area should be considered, and not just a single receptor which comprises the byway section of the route, as many receptors are using the route, whether a byway or minor road with no pavements (as is the norm on rural minor routes), to transit from one part of the CNL to the other. Therefore, the council	The Applicant has undertaken an assessment of the sequential visual effects on users of the Fosse Way within the **Technical Note on Cumulative Sequential Visual Effects [REP1-123]**.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			recommends that a sequential cumulative visual impact assessment is undertaken along the length of the Fosse Way within the DCO Order Limits.	
WC-067	Landscape and Visual	Response to Written Representations	5.7. It appears that at WC-031, there has been an attempt to downplay the effect of hedgerow loss relating to the Fosse Way route, by stating that: 'In the context of the hedgerow network across the Solar PV Sites (which is 73.44 km), this loss will be proportionately very small (far less than 1 %)….' . This is entirely irrelevant as the specific exampled concern expressed, relates to the landscape and visual effects on the Fosse Way Route and not the rest of the development areas A-E and the CRC. Clearly, the percentage of the hedgerow removed along the Fosse Way will be higher.	The Fosse Way extends for approximately 4.5km through the middle of the Lime Down Scheme, across this length there are 7 separate Access points required to provide access into the adjacent areas of LD Sites B and C. Of these only 4 access points provide access into field with solar PV infrastructure: • Solar Access Point 202 into field B6; • Solar Access Point 3 into field C22; • Solar Access Point 19 into field C12; and • Solar Access Point 1 into field C11. Where sections of hedgerow are required to be permanently

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				removed for new internal access tracks and where no existing gap is present removal would typically be between 3.5 m to 6 m in width. Therefore, it is estimated that there would be between 14m and 24m of loss alongside those entrances identified above, and between 24.5m and 42m across all 7 separate access points. As a percentage, this is 0.4667% of the hedgerows alongside the Fosse Way (on either side). A Hedgerow Removal Plan showing anticipated permanent hedgerow losses is provided at Appendix A of the **Outline Ecological Protection and Mitigation Strategy [REP3-102]**.
WC-068	Landscape and Visual	Response to Written Representations	5.8. In respect of WC-025 and WC-026, the Council reiterates its opinion that growing existing hedges to at least 4.5m to screen the solar panels will create a tunnel-like effect which is out of	The layout of the scheme has been derived through the use of a series of buffers that have been embedded into the scheme including extensive offsets from

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			character with the existing expansive views. However, to the south-east of the Fosse Way, panels will remain visible viewed over the low eastern roadside hedgerow (located outside DCO boundary limits, beyond the control of the Applicant).	existing PRoW. Alongside PRoW, a 15m offset has been provided to any proposed infrastructure. In fields with proposed panels, this 15m is typically to the nearest fenceline, there is then a 4m offset between the fenceline and the panels. The result of this is a minimum 38m wide buffer between panels where PRoW cross field containing the arrays, maintaining open views of the horizons and skylines.
WC-069	Landscape and Visual	Response to Written Representations	5.9. With respect of the Applicant's response to WC-027 and WC-040, there remains no indication as to where soil storage will take place, the quantities involved and the duration of the storage. As stated in the response to WC-032 and WC-045, it is likely that these stockpiles will remain in place until decommissioning in 60 years. The council considers that this is a fundamental issue which must be further examined, as the	The **Outline Soil Resources Management Plan [REP3-098]** notes that soil stockpiles will be built according to best practice principles that will be further specified in the detailed SRMP. The general principles for locating stockpiles include locating stockpiles away from water courses, not within the span of tree root- and crown-spread, and in locations where the stockpiles will not be disturbed by subsequent

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			construction and design of soil storage areas has the capacity to result in significant changes to landform, land use and landscape character / visual amenity given the large DCO footprint area. The ES LVIA has no assessment of the landscape and visual effects of soil storage and makes no guiding mitigating recommendations over the physical form or location of these to minimise as far as possible any resulting landscape and visual effects, despite their potential to have significant adverse landscape and visual effects.	construction works. Best practice in regard to the physical form of stockpiles dictates an ordinary maximum height of 3m for topsoil and 4m for subsoil, with a slope angle not exceeding 1 in 2. Long-term stockpiles will be seeded with an appropriate seed mix. The **LVIA [APP-060]** 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 has undertaken a worse case assessment in accordance with the principles of the 'Rochdale Envelope'.
WC-070	Landscape and Visual	Response to Written Representations	5.10. The Applicant's response to WC-047 relates to the council's	The access track to the BESS will cross the brashy limestone soil

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			consideration of on-site soil stockpiling requirements. The council notes the Applicant's response to the council's comments but reiterates that the 500mm track construction depth referenced and used in the council's calculations is taken from the Applicant's own illustrative drawing 'Access track to the BESS Area' (6.3 Environmental Statement Volume 3, Appendix 3-3 Illustrative Drawings [APP-184]) which clearly illustrates a 500mm total construction depth (for the calculation provided by the council) which is likely to require excavation both topsoil and subsoil levels, both which will require separate stockpile storage for 60+ years pending full land restoration at decommissioning.	type described in **ES Volume 3, Appendix 17-1: Agricultural Land Classification and Soil Resource Survey Report [REP3-067]**. As demonstrated in the photographs provided at Annex C of Appendix 17-1, there is commonly fractured limestone bedrock within around 400mm of the ground surface within this soil type, which limits the volume of recoverable soil material that will require stockpiling.
WC-071	Landscape and Visual	Response to Written Representations	5.11. The Applicant considers that the council has overestimated the required footprint areas for soil stockpiling in its calculations of (worst case) 3m high stockpile storage heights, which the council	The Applicant's calculation is as follows: (2*4500)/43*(39+43) = ~2.5m, rather than 2.4m previously calculated, and accounts for side gradients of approximately 56

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			does not accept. 5.12. The Applicant's calculation assumes an unsupported stockpile perimeter edge of 43 x 43 x 2.4m high (i.e. vertical 2.4m perimeter edges) to support their differing conclusion. The council has factored a 45-degree angle of repose (1 in 1 gradient) to support 3m high stockpile sloping perimeter edges within its stockpile footprint calculations; the Applicant's calculation does not. If anything, the council has underestimated its footprint areas slightly to accommodate the storage of 4,500m3, as a 60-degree angle of repose would be more realistic (1 in 2 gradient) to maintain soil stockpile profiles. The council stands by its estimates as included within its Written Representation [REP1-138] for the above reasons.	degrees. Regardless, the estimated volume of 4,500m3 is based on an excavation depth of 500mm, which is a maximum value, however in reality there is not this quantity of soil above limestone bedrock in the brashy limestone soil type that the access tracks cross. The actual volume of soil the be excavated from the BESS access track locations requiring stockpiling is likely to be smaller.
WC-072	Landscape and Visual	Response to Written Representations	5.13. With respect to the Applicant's response to WC-033 through WC-044, the concerns expressed by the council remain in respect of the two major areas of	Please see Applicants written response to ExA QLV1.8. The visual effects of the Scheme on the village of Norton (Receptor RS008)) has been assessed **in ES**

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			18 solar panels and infrastructure to both the north and south of the Norton, Lime Down Solar Park Sites B and D respectively, as well as a particularly large swathe of the cable route corridor located to the southwest of the village which includes a major construction compound and proposes site access from the end of the byway section of the Fosse Way. The proposed development will effectively surround the settlement with very large industrial developments in a distinctly rural and relatively tranquil area with High Landscape Value and Sensitivity, which the council considers have not been adequately assessed against the receiving landscape character and the visual amenity of the area. The response by the Applicant has been to primarily reiterate their ES LVIA assessments which, the council considers have consistently downplayed the adverse landscape and visual effects of the	**Volume 1, Chapter 8: Landscape and Visual [APP-060]**. These receptors are assessed in **Appendix 8-3-1: Visual Assessment Sheets (Not carried through to the ES Assessment) [APP-189]**. As no significant effects were recorded due to the distance to infrastructure from the receptors and the fact that the village is nestled within a valley, Norton was not carried through to the further ES Assessment) The LVIA in **ES Volume 1, Chapter 8: Landscape and Visual** [**APP-060**] recognises that there will be Moderate Adverse (Significant) effects on the character of the Landscape surrounding Norton (within the 1km Study Area) during construction as a result of the Scheme and the change from agricultural land to a solar infrastructure. Due to the location of the village within a valley and the rising topography in all

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			proposals on the village of Norton and the surrounding countryside.	directions, its immediate setting is constrained. Existing vegetation on edge of the village provides further containment. The wider setting of the village is only perceived on the minor roads leading to and from the village on higher ground. The adverse effects of the Scheme within the surrounding landscape of the village will have no direct effects on the village itself. Due to the location of the village within a valley and the rising topography in all directions there is very limited visibility of the Scheme. Once on higher ground on any of the minor roads leading to and from the village the visual assessment acknowledges that there are some Significant adverse effects to visual amenity. Refer to Assessments for Receptors TR057, TR060, TR061 and TR202 which are summarised in **[APP-192]**.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
WC-073	Landscape and Visual	Response to Written Representations	5.14. The Applicant's response to WC-049 relates to the council's consideration of the 9.2 Tranquillity Technical Note [PDA-010] for Lime Down Solar Park, which was provided by the Applicant at Procedural Deadline A on 9 March 2026. The council has reviewed its comments and the response from the Applicant [REP2-039] and maintains that its comments, as included within its Written Representation [REP1-138] on this matter remain valid, concluding at 5.23: "The Tranquillity Technical Note [PDA-010] hasn't answered the fundamental questions relating to how the potential noise from the proposed development from construction to decommissioning is going to affect the landscape as a resource and the receptors (residents and visitors) within the receiving landscape area/s. It is unlikely that this can be ascertained with any degree of certainty until a fully detailed	The Applicant notes this comment and is intending on submitting an updated Tranquillity Assessment at Deadline 5.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			development scheme is submitted."	
WC-074	Ecology and Biodiversity	Response to Written Representations	Ecology and Biodiversity 5.15. Wiltshire Council's Ecology Officer has not provided responses to every reference detailed in Section 2 but instead has responded to those references where it has been deemed necessary or helpful for the Examining Authority (ExA).	The Applicant has responded to the issues raised by the Council in the relevant responses below (References WC-075 to WC-093).
WC-075	Ecology and Biodiversity	Response to Written Representations	WC-005: Executive Summary 5.16. The council's Ecology Officer notes the Applicant's response to this point but does not consider that it wholly addresses all the points and concerns raised on this topic and instead appears to effectively repeat information that has already been provided previously and which has therefore already been considered by Wiltshire Council. As such, the council maintains its view as set out in the Written Representation [REP1-138] and Comments on Submissions Received at	The Applicant refers to the response provided to WC-005 on pages 24 – 25 of **The Applicant's Response to Written Representation [REP2-039]**. The Applicant considers that a reasonable worst-case scenario relating to hedgerow removal has been assessed as part of **ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]** and is in accordance with hedgerow removal powers that can be exercised under Schedule 12 of Article 40 of the **Draft DCO [REP3-005].**

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			Deadlines 1 and 1A [REP2-048], submitted at Deadline 2. 5.17. Furthermore, the summary in the column titled 'Comments / Issue Raised' set out under reference WC-005 fails to recognise that in its Written Representation, the council's Ecology Officer did acknowledge and discuss the provisions of Article 40 and other control documents together with the considered shortfalls and outstanding concerns. These concerns remain in the whole for the reasons already discussed in the aforementioned representations submitted by the council.	
WC-076	Ecology and Biodiversity	Response to Written Representations	WC-006: Executive Summary 5.18. See comments for references WC-055, WC-056 and WC-057 below. WC-007: Executive Summary 5.19. The Applicant's response to the issue is noted. The explanation provided therein, which specifies	The Applicant notes this comment and refers to the response provided at to WC-007 on pages 26 – 27 of **The Applicant's Response to Written Representation [REP2-039]**. However, the Applicant has considered the choice of wording

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			that modified grassland in poor condition comprises a UKHab habitat type and predicted condition rather than a comment on its quality for use by birds, is superfluous however, because the council is obviously aware of this information as evidenced by the representations it has already provided and the fact that the council has required the Biodiversity Net Gain (BNG) assessment and Statutory Biodiversity Metric to be completed on the basis that post-development grassland habitat projected to be attainable underneath and between the panels should comprise modified grassland of poor condition. Moreover, the response fails to wholly address the issue raised within the council's Written Representation related to the statement within paragraphs 9.12.31 - 9.12.32 of the ES Chapter 9: Ecology and Biodiversity [APP-061] that there would be creation of 'diverse'	in Paragraph 9.12.32 of **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]** with respect to grassland habitats to be established across the Solar PV Sites to and proposes to replace the word 'diverse' with 'low-input'. This is considered a more accurate term for the description for all proposed grassland habitat types to be established. This reflects how across the Solar PV Sites, no routine application of fertiliser or pesticide will be applied, and thus grassland across the Scheme can be reasonably expected to provide increased foraging resources compared to existing arable land, through increasing the diversity and abundance of invertebrate prey. An amended version of **ES Chapter 9 [REP1-015]** with this change will be submitted at the next examination Deadline.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			grassland types underneath and between the Solar PV Panels and that this will reduce the impacts of displacement of skylark and yellow wagtail. The issue raised by the council also pertained to the fact that the suggestion put forward in paragraphs 9.12.31 - 9.12.32 of the ES Chapter 9 contradicts the projection reported elsewhere within Chapter 9 and other documents on the advice of Wiltshire Council, that as aforementioned, only modified grassland in poor condition can be expected to establish under and between panels. 5.20. It is therefore considered that the Applicant's response to WC-007 fails to fully acknowledge the points made by the council in its Written Representation. Please note the inaccuracy of paragraphs 9.12.31 – 9.12.32 of the ES Chapter 9 were verbally acknowledged by the Applicant's ecological consultant during a	

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			meeting on 1st April 2026 and within the associated meeting minutes subsequently drafted by the ecological consultant.	
WC-077	Ecology and Biodiversity Arboriculture	Response to Written Representations	WC-008: Great Crested Newts 5.21. See comments for reference WC-062 below. WC-009: Biodiversity Net Gain 5.22. See comments for references WC-063 to WC-074 inclusive. WC-050: Draft Development Consent Order and Hedgerows 5.23. The Applicant's response is duly noted. The council is, however, familiar with the Hedgerow Regulations 1997 and the 'important hedgerow' criteria and recognises that the criteria relate to archaeological and heritage / historical 20 factors as well as matters of ecological value including number of composite woody species. Nonetheless, 'important'	The Applicant notes the Council's comments. The Applicant confirms that all hedgerows were subject to survey against the ecological criteria for determining 'importance' under the Hedgerow Regulations 1997 during baseline habitat surveys. The methodology sections of **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]** and **ES Volume 3, Appendix 9-1: Ecological Baseline Report [EN010168/APP/6.3]** will be updated to confirm this at Examination Deadline 4. The information collected was combined with historical and landscape information to determine those hedgerows across the Order Limits considered to be 'important'. The results of this multidisciplinary exercise are presented in map

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			hedgerows are distinct from most other habitats within or adjacent to the Order Limits in that they are legally protected from removal by virtue of a dedicated Statutory Instrument, namely the Hedgerow Regulations 1997 (SI No. 1160). 5.24. Moreover, in order to determine whether a hedgerow meets the 'important' criteria detailed in the regulations there must have been specific evaluation and / or survey, and although the associated methodology and evidence of findings isn't explicitly provided within Chapter 9 of the ES [APP-061] or the ES Volume 3, Appendix 9-1: Ecological Baseline Report [APP-198], this must be available to the Applicant given that Schedule 12 of the Draft DCO includes a table of 'important' hedgerows within the Order Limits which indicates that the 'important' hedgerows have been identified by evaluating all the hedgerows with	form in **2.7 TPO and Hedgerow Plan [APP-011].** The Applicant considers the assessment of effects on hedgerows in **ES Chapter 9 [REP1-015]** to be sufficiently robust, and does not consider it essential to provide separate information relating to those hedgerows considered to be 'Important' for ecological reasons only

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			regard to the Hedgerow Regulations criteria. 5.25. As such, it is not evident why the evidence and information that must have been collated during the aforementioned identification process hasn't been included within ES Volume 3, Appendix 9-1: Ecological Baseline Report and / or ES Chapter 9 to demonstrate which criteria the hedgerows have been assessed as fulfilling, and to allow verification. The reason why this supporting information has not or cannot be provided is not apparent. 5.26. If a hedgerow was determined as being 'important' for ecological reasons, because in addition to being at least 30 years old, one of the criteria it met is that it includes woody species and associated features as specified in Schedule 1, Part II Criteria, paragraph 7(1) of the Hedgerow Regulations, then it follows that this must have been ascertained by means of survey. The results of	

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			that survey should be clearly provided within the ES and relevant supporting appendix (either a dedicated Hedgerow Survey Report or within ES Volume 3, Appendix 9-1: Ecological Baseline Report) together with contextual discussion in relation to the Hedgerow Regulations 1997. It is noted that the 'Methodology' section of ES Volume 3, Appendix 9-1: Ecological Baseline Report (APP-6.3) doesn't have any discussion regarding hedgerows survey, only habitat survey. There is also no discussion regarding hedgerow survey within ES Chapter 9 (Section 9.6: Assessment Methodology under subheading of 'Field Survey'). It is therefore assumed that the hedgerows must have been surveyed with regard to the regulation criteria during the habitat survey, although this is not specified in the report or in Chapter 9 of the ES.	

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			5.27. Therefore, although the Applicant's response to WC-050 states that the assessment of hedgerows within ES Volume 1, Chapter 9 Ecology and Biodiversity (Rev 2) [REP1-015] was based on their intrinsic value to biodiversity and that this is in line with the evaluation of all other habitat types present within the Order Limits and in accordance with the methodology described for the evaluation of Ecological Importance in paragraphs 9.6.19 to 9.6.22 of ES Chapter 9 Ecology and Biodiversity (Rev 2) [REP1-015], given the legal protection afforded to 'important hedgerows' this should have implications for how the hedgerows are valued and should be recognised within the ES. Moreover, given the dedicated survey required to determine if a hedgerow meets the criteria in Schedule 1, Part II Criteria, paragraph 7(1) of the Hedgerow Regulations, a greater level of survey is therefore required than	

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			for other habitats present that are of lower ecological value.	
WC-078	Ecology and Biodiversity Arboriculture	Response to Written Representations	WC-051: Draft Development Consent Order and Hedgerows 5.28. The Applicant's response to the issues and concerns raised by the council as detailed in reference WC-051 effectively constitutes a duplication of information that has already been acknowledged, appraised and discussed by the council within its Written Representation, Local Impact Report (LIR), Relevant Representation and Representation submitted at Deadline 2. 5.29. Therefore, whilst the provisions of Article 40(4) and control documents cited are duly noted, the council considers that the Applicant's response does not adequately address the queries raised or allay the council's concerns because a fully justified reason why Schedule 12 Part 1	The Applicant notes Wiltshire Council's continued concern regarding the scope of Schedule 12 Parts 1 and 2 of the **Draft DCO [REP3-005]**. The Applicant has addressed this point in its response to ExQ EB1.17 **[REP3-128]**, confirming that, whilst Schedule 12 does list every hedgerow where removal may be required, this is expressly subject to Article 40(4), which provides that the undertaker may only remove the hedgerows listed to the extent set out in the **Outline Ecological Protection and Mitigation Strategy [REP3-102]**. The Outline EPMS is in turn secured by Requirement 8 within Schedule 2 of the Draft DCO, such that breach of these measures would be an offence. The breadth of Schedule 12 is required in advance of detailed design in order to allow the Applicant flexibility within the parameters set by the Outline

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			and 2 of the Draft DCO needs to effectively include the entire extents of all hedgerows within the Order Limits is yet to be provided in the council's opinion. The current scope of Schedule 12 of the Draft DCO is still considered to represent a misuse of the 'Rochdale Envelope' approach given that any detailed design required prior to commencement of construction should not need to substantially deviate or differ from the DCO control documents and plans. Therefore, whilst it is recognised that it's likely not possible at this stage to determine the exact details of all hedgerow removal required across the Order Limits, the Scheme design should be sufficiently evolved to avoid the need for the Draft DCO to be prepared on the basis that any extent of any hedgerow within the Order Limits may need to be removed. It should have been possible to refine the lists of hedgerows that could potentially	EPMS; the final EPMS and, by extension, the extent of removal in respect of the hedgerows listed in Schedule 12, will be subject to the approval of Wiltshire Council in consultation with the relevant statutory nature conservation body. In order to assist with the interpretation of Article 40 and to address the concern that the scope of Schedule 12 may be misread as authorising the removal of the full extent of each hedgerow listed footnotes have been included in the updated **Draft DCO [REP3-005]** submitted at Deadline 3.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			be subject to removal or partial removal.	
WC-079	Ecology and Biodiversity Arboriculture	Response to Written Representations	References WC-052 to WC-054: Draft Development Consent Order and Hedgerows 5.30. The Applicant's responses to the issues and concerns raised by the council are duly noted, however, much of the responses effectively constitute a duplication of information that has already been acknowledged, appraised and discussed by the council within its Written Representation, Local Impact Report (LIR), Relevant Representation and Representation submitted at Deadline 2. As such, the Applicant's responses do not wholly address or overcome the queries raised. 5.31. As a point of clarity, the council wishes to highlight that some text in the Comment / Issue Raised column has been paraphrased from the council's Written	The Applicant notes this comment. It is the Applicant's view that the response provided to WC-052 to WC-054 on pages 95 – 109 of **The Applicant's Response to Written Representation [REP2-039]** has addressed the points raised concerning the extent to which the **Draft DCO [REP3-005]** confers hedgerow removal powers and that the assessment of effects of potential hedgerow removal is consistent across application documents. 5.31. Extracts from application documents were not misconstrued by the Applicant. The Applicant acknowledges that italicisation was not retained when Wiltshire Council's Written Representation was transferred into tabular format. While the Applicant considers that the wording, quotation marks and references in WC-052 to WC-054 sufficiently identified the quoted material, it will aim to retain such

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			Representation with the result that some extracts from DCO documents included within the council's Written Representation have been presented within the aforementioned column in such a way that they could be misconstrued as the council's words.	formatting in future tabulated responses to avoid any potential misunderstanding.
WC-080	Ecology and Biodiversity	Response to Written Representations	WC-055: Habitats Regulation Assessment (HRA) 5.32. The Applicant's response is noted. Nonetheless, it appears to omit any response to the concern raised regarding the lack of evidence to demonstrate that the HRA has been assessed on the worst-case scenario as is required when relying on the Rochdale Envelope approach. 5.33. In addition, although the Applicant's response specifies that they provided comment regarding the outstanding habitat surveys within the CRC in their Response to Relevant Representations (Part	The Applicant notes this comment. The Applicant refers to the response provided to WC-005 on pages 24 – 25 of **The Applicant's Response to Written Representation [REP2-039]**. The Applicant considers that a reasonable worst-case scenario relating to hedgerow removal has been assessed as part of ES Volume 1, Chapter 9: Ecology and Biodiversity and is in accordance with hedgerow removal powers that can be exercised under Schedule 12 of Article 40 of the **Draft DCO [REP3-005].**

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			1) [PDA-009] and that an updated ES Volume 1, Chapter 9: Ecology and Biodiversity (Rev 2) [REP1-015] with the findings of the outstanding surveys was submitted at Deadline 1, it should be recognised that Deadline 1 was not until 1st May 2026, almost five months after the council submitted its Relevant Representation and nearly eight months after the DCO application was submitted.	
WC-081	Ecology and Biodiversity	Response to Written Representations	WC-056: Habitats Regulations Assessment (HRA) 5.34.The Applicant's response in part effectively repeats back information already discussed within the associated comment / issue under reference WC-056, rather than actually answering it. Confirmation by the Applicant that a total of 50 m of hedgerow is expected to be removed is noted. However, the council had already deduced this and the onus of the comment in the Written Representation pertained to how the HRA lacked the appropriate	The Applicant notes this comment. It is the Applicant's view that the response provided to WC-056 pages 111 - 112 of **The Applicant's Response to Written Representation [REP2-039]** has addressed the points raised concerning the total extent of hedgerow expected to be removed for cable installation works where the Cable Route Corridor intersects the Wiltshire Impact Zone for Bats, and how this is considered to be a reasonable worst case scenario upon which an

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			level of detail and inconsistency between submitted documents. 5.35. The Applicant's response stipulates that "…outcome and conclusions of the HRA Report [APP 275] have been discussed and agreed in principle with Natural England, with only minor procedural points of clarification remaining between the parties which are expected to be resolved through ongoing discussions." 5.36. The council has reviewed the Applicant's Response alongside the Statement of Common Ground with Natural England (May 2026 Revision 1) [REP2-026] and therefore provides associated comments in relation to this document within this response.	adequate assessment of effects has been made.
WC-082	Ecology and Biodiversity	Response to Written Representations	WC-057: Habitats Regulations Assessment (HRA) 5.37. The Applicant's response is noted although it repeats information already acknowledged and discussed by Wiltshire Council within previous representations	The Applicant notes this comment. It is the Applicant's view that the response provided to WC-057 on pages 113 – 114 of **The Applicant's Response to Written Representation [REP2-039]** has addressed the point raised concerning the maximum width of

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			and reports and does address the crux of the matter.	hedgerow that can be removed for cable installation works where the Cable Route Corridor intersects the Wiltshire Impact Zone for Bats, and how this is secured within the **Outline Ecological Protection and Mitigation Strategy [REP3-102]** .
WC-083	Ecology and Biodiversity	Response to Written Representations	WC-061: Breeding Birds 5.38. Please see the council's comments against reference WC-007 which are also relevant to WC-061. 5.39. The Applicant's response to WC-061 includes the following statement: "The Applicant acknowledges the reference to 'diverse' grassland in this instance primarily extends to grassland types within buffer zones and easements, which are expected to represent the relatively diverse grassland habitat type 'other neutral grassland' once established." 5.40. Recognition that use of 'diverse' in the context of modified	The Applicant notes the Council's comments and refers to WC-076 on the subject of grassland expected to be established across the Solar PV Sites. The Council has referred to the recently published Topic Paper 'Solar Farms & Skylark (Solar Energy UK, June 2026). With respect to the suitability of grassland established within and beneath panels The Applicant highlights the following paragraph on page 11 of the Topic Paper: 'Where pairs are present in the wider area, solar farms managed with permanent grassland are likely to provide a long-term foraging gain for Skylarks, albeit this is likely to be limited to the

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			grassland in poor condition which is projected to constitute the attainable grassland under and between the solar panels in order to be suitably conservative and precautionary in accordance with advice from Wiltshire Council, is welcomed. Similar recognition is not apparent in the Applicant's Response to reference WC-007. 5.41. The Applicant's response specifies that "…although grassland expected to establish within and beneath panels has been assumed to represent modified grassland in poor condition, this does not preclude it from providing valuable foraging habitat for grounds nesting birds including skylark and yellow wagtail." 5.42. In relation to the projected modified grassland, the Applicant's response also specifies that "…fundamentally the grassland can still be expected to provide improved foraging resources for	fringes of the solar farm development. The cessation of cultivation and agricultural-chemical inputs enables soil recovery and increased invertebrate diversity, improving food availability. Over an operational lifespan of 25– 60 years, this produces a sustained ecological benefit, even if nesting habitat within the array is lost or reduced. Consequently, whilst solar farms displace breeding pairs from nesting within a development site, they can also provide an area of better-quality habitat for nearby retained pairs, potentially leading to increased breeding productivity. This can provide a reliable food resource for the operational lifetime of the solar farm, which is likely to be otherwise subject to changes in farming practices and market conditions.' The Applicant considers this is in-line with the conclusion of the likely improvement in foraging resources

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			skylark in comparison to existing arable habitats generally." 5.43. For clarity, the council wishes to highlight that at no point has it stated that modified grassland in poor condition is precluded from providing foraging habitat for ground nesting birds, including skylark and yellow wagtail. 5.44. Displacement of ground nesting birds from the Solar PV Sites could result in birds nesting off-site in adjacent and nearby open fields where suitable nesting habitat is present, as well as within any suitable open areas of the Order Limits that won't have solar arrays, and birds may therefore continue to forage within areas of the Solar PV Sites that will no longer be suitable for ground nesting, due to proximity and because field margins of the Solar PV Sites will be uncultivated. It is deemed that displaced birds will need to exploit all available foraging opportunities and resources that adjacent and	available to skylarks described in paragraphs 9.12.32 and 9.12.33 of the **ES Volume 1, Chapter 9: Ecological and Biodiversity [REP1-015]**. It is noted the Council does not appear to explicitly disagree with this conclusion. The Applicant agrees with the Council's view that the proposed mitigation measures for ground-nesting birds will not fully mitigate or compensate impacts. A significant adverse residual effect on this species group is acknowledged and transparently reported in **ES Chapter 9 [REP1-015].**

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			nearby habitats afford, including those within the Solar PV Sites. 5.45. In addition, although not a comment on the potential intrinsic value of modified grassland as a foraging resource, it should be borne in mind that solar arrays provide elevated vantage points and perch sites for raptors, thereby likely increasing the predation risk for any birds foraging within the Solar PV Sites and ground-nesting in the vicinity and / or within areas of the Site without solar arrays. 5.46. In relation to the Applicant's conclusion that modified grassland within the Solar PV Sites is expected to provide improved foraging resources for skylark compared to existing arable habitats, it should be noted that existing habitats in the Solar PV Sites, including arable fields, already serve as a foraging resource as well as nesting habitat. Therefore, even if the arable fields within the Solar PV Sites do not constitute optimal foraging habitat,	

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			and the removal of arable land from productive cultivation will potentially enhance its foraging potential, the council considers it important that purported benefits for breeding birds, especially ground-nesting species such as skylark and yellow wagtail which will largely be displaced from the proposed Solar PV Sites, are thoroughly considered with due regard to all potential adverse effects and risks to breeding productivity. 5.47. It is the council's view that the proposed mitigation measures will not fully mitigate, compensate or offset the overall harm and adverse impacts to breeding birds, especially ground-nesting species. For information, the council is aware of the recent publication of Solar Farms & Skylark (Solar Energy UK, June 2026).	
WC-084	Ecology and Biodiversity	Response to Written Representations	WC-062: Great Crested Newts and Mitigation Strategy for the Solar PV Sites	The Applicant notes this comment and refers to the response provided to WC-062 on pages 121–125 of **The Applicant's**

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			5.48.The Applicant's response is noted. The council is, however, familiar with the detail of the well-known studies cited within the Applicant's response. In the main, the Applicant's response presents information that the council has already reviewed and appraised to inform its Written Representation. It is recognised though, that the response now provides confirmation that the Applicant does not intend to acquire a great crested newt mitigation licence for the Solar PV Sites. This information has been lacking to date and should have been explicitly discussed and justified within the submitted DCO documents. 5.49. Despite the avoidance and mitigation measures proposed, including the implementation of protected buffer zones, the sensitive timing of certain works and attendance of an Ecological Clerk of Works (EcoCoW), the	**Response to Written Representation [REP2-039].** This response sets out why, in the Applicant's view, the embedded and additional avoidance and mitigation measures are appropriate and sufficient to avoid impacts on great crested newts at the Solar PV Sites. On this basis, the Applicant does not intend to obtain a great crested newt mitigation licence. However, Paragraphs 13.4.1 and 13.5.3 of the **Outline EPMS [REP3-102]** note that, as a contingency measure, in the unlikely event great crested newts are encountered during construction despite the implementation of avoidance measures, or where such measures have not been implemented, a great crested newt licence may need to be obtained before certain works at the Solar PV Sites can continue.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			council remains concerned regarding the potential for contravention of the Conservation of Habitats and Species Regulations 2017, particularly beyond the proposed 50m buffers around ponds. The council highlights to the ExA that Natural England's 'standing advice' for great crested newts (GCN) clearly sets out that it is not only an offence to deliberately kill, injure, disturb or capture GCN or to deliberately destroy their eggs, but that it is also an offence to damage or destroy their breeding sites and resting places (including when GCN are not present) and to possess, control or transport them (or any part, alive or dead). The 'standing advice' specifies that it is also an offence under the Wildlife and Countryside Act 1981 to intentionally or recklessly: •Disturb them while they occupy a structure or place used for shelter or protection;	

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			•Obstruct access to a place used for shelter or protection. 5.50.The 'standing advice' stipulates: "If the developer has chosen not to use a DLL where one exists and their activities are likely to affect GCN, the developer must apply for a GCN mitigation licence." 5.51. It is the council's view that despite the avoidance and reduction measures proposed, given the nature and scale of the works and activities proposed at the Solar PV Sites, the potential for an offence to be committed cannot be discounted and that a suitably robust rationale to substantiate why a mitigation licence will not be obtained, has still not been provided. Furthermore, it would have been prudent and straight forward for the Applicant to extend its application to use Natural England's District Level Licensing (DLL) Scheme for the Cable Route Corridor (CRC) so that it also encompasses the Solar PV Sites.	

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			It is not evident whether this matter has been discussed between the Applicant and their ecological consultant and Natural England during the course of the substantive number of communications and meetings that appear to have taken place between the parties according to the Statement of Common Ground with Natural England (May 2026 Revision 1) [REP2-026] submitted at Deadline 2. The council presumed this topic would have been discussed, especially in light of the Applicant's recent application to Natural England to use their GCN DLL Scheme for the CRC.	
WC-085	Ecology and Biodiversity	Response to Written Representations	5.52. Nevertheless, it is evident from a review of the SoCG, that Natural England also has outstanding concerns regarding the Applicant's intended approach with respect of GCN at the Solar PV Sites as it is detailed under reference 3.3.12 of Table 3-3: Ecology and Biodiversity of the SoCG:	The Applicant notes this comment and confirms that discussion is ongoing with Natural England regarding mitigation for great crested newts at the Solar PV Sites. Details on the avoidance and mitigation measures designed to avoid significant adverse impacts on this species are set out in Method Statement 13 of the

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			"Natural England has outlined its position on European protected species and is seeking further information on potential impacts. This includes details of habitat clearance, badger survey methodology, mitigation for impacts on great crested newt (GCN) habitat related to the solar PV site, and evidence of engagement with Natural England where protected species licences may be required. To date, no draft protected species licence applications have been submitted for review. Natural England advise that further evidence is required to assess the potential effects and sufficiency of mitigation in relation to protected species. Natural England is not satisfied that sufficient evidence has been provided to demonstrate that the project will not result in significant adverse effects to protected species." 5.53. It is also stated against reference 3.3.16 in Table 3-3: Ecology and	**Outline EPMS [REP3-102].** It is understood that Natural England have not yet had opportunity to review the **Outline EPMS [REP3-102]** due to resourcing constraints and therefore this matter remains under discussion.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			Biodiversity of the SoCG [REP2-026]: "Survey effort to date is likely sufficient to support entry into the District Level Licensing scheme, though updated surveys may be needed if there is a long delay before consent. The proposed DLL approach for cable route impacts is considered appropriate; however, mitigation for Solar PV sites is less clear. While timing of works and pond buffers are welcomed, further consideration is needed for impacts to terrestrial, connective, and foraging habitats, particularly within 50m of ponds, where additional mitigation and licensing may be required."	
WC-086	Ecology and Biodiversity	Response to Written Representations	WC-065: Biodiversity Net Gain (BNG) 5.54. The Applicant's response is noted; however, the council maintains its view on this matter.	The Applicant notes this comment.
WC-087	Ecology and Biodiversity	Response to Written Representations	WC-066: Biodiversity Net Gain (BNG) 5.55.	The Applicant notes this comment and refers to the response provided to WC-066 on pages

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			The Applicant's response is noted; however, it does not wholly address or overcome the issues raised. Although the response confirms that all hedgerows to be temporarily removed within the CRC have been treated as lost, followed by creation on reinstatement as set out in paragraph 1.8.2 of the BNG Assessment Report [REP1-089], this cannot be verified for the reasons the council has already explained.	136–138 of **The Applicant's Response to Written Representation [REP2-039]** on the Applicant's approach to presentation of Biodiversity Net Gain calculations.
WC-088	Ecology and Biodiversity	Response to Written Representations	WC-067: Biodiversity Net Gain (BNG) 5.56. The Applicant's response is noted; however, it does not wholly address or overcome the issues raised and the council maintains its view on this matter.	The Applicant notes this comment.
WC-089	Ecology and Biodiversity	Response to Written Representations	WC-069: Biodiversity Net Gain (BNG) 5.57. The Applicant's response states: "The Minimum Mappable Units (MMU) for baseline UK Habitat	Whilst it is recognised by the Applicant that UK Habitat Classification User Manual Version 2.0 (2023) supersedes Version 1.0 (2018), as noted in Wiltshire Council's response, Version 2.0

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			Classification surveys across the Scheme was determined based on guidance presented in Section 2.2 of the UK Habitat Classification User Manual Version 1.0 (May 2018), published by the UK Habitat Classification Working Group. No updates to the guidance relating to MMU are presented in UK Habitat Classification Version 2.0 (2023). As such, the guidance set out within the UK Habitat Classification User Manual Version 1.0 is considered to represent the most recent published guidance relating to MMU and represents a robust source from which to justify determination of MMU at the Solar PV Sites and Cable Route Corridor." 5.58. The Applicant is therefore specifying that the 2018 version of the UKHab Classification User Manual was used. For clarity, the BNG Assessment Report did not cite the 2018 version of the user manual or even include it in the	does not provide specific guidance on the recommended size of the Minimum Mappable Unit (MMU). In the absence of updated MMU guidance from UKHab Ltd., the Applicant considered it appropriate to apply the most recent published guidance relating specifically to MMU size, taking account of site size and scheme context, as set out in the response to WC-069 on pages 146–150 of **The Applicant's Response to Written Representation [REP2-039].** The Applicant is not aware of any alternative published guidance from UKHab Ltd. or other relevant professional bodies that provides updated or equivalent guidance on MMU size for UKHab surveys. Consequently, the Applicant considers that reliance on the most recent published MMU-specific guidance represents the most appropriate and robust basis for ensuring consistency of habitat mapping across the Scheme.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			References section, hence why the council queried where the approach adopted was actually advocated in the guidance, because as far as the council is aware, the approach adopted by the Applicant is not recommended in the current version of the UKHab document. This is because, importantly, the 2018 version of the document has been superseded by UK Habitat Classification Version 2.0 (UKHab Ltd. 2023) which was published in July 2023 and therefore should have been used for Lime Down Solar Park as it was published in time. The methodology detailed in the current UKHab document should have been used, and it is not considered appropriate to default to, and rely upon approaches detailed in the out-of-date version because it is more convenient for the project. All parts of the methodology from the 2018 version that the authors deemed still sound and appropriate for use would have been	

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			transposed across into the 2023 version, and so any omissions regarding MMUs from the 2023 are clearly intentional. 5.59. Critically, the council considers that the ExA should note that in relation to UK Habitat Classification Version 2.0 (UKHab Ltd. 2023), UKHab Ltd states on its website: "It supersedes all older versions, which should not be used in any circumstances." (See for details: UKHAB Documentation – ukhab). 5.60. The Applicant's response to this matter then stipulates: "In line with the Handbook for Phase 1 Habitat Survey (2010 Edition), target notes were collected where notable ecological features, including habitat parcels that were too small in size to be captured by the MMU, were present." 5.61. It then states: "Habitats identified as target notes were not included within the BNG calculations presented within the	

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			BNG Assessment Report [REP1-089] and Statutory Biodiversity Metric [REP1-091], owing to the MMU and given that the habitat types were not notable in the context of the baseline habitats recorded. This limitation is recognised within the BNG Assessment Report [REP1-089] but is not considered significant for the reasons outlined above;…" 5.62. Firstly, the use of target notes is not considered to comprise a suitable substitute for appropriate mapping. Secondly, whilst there is a broad discussion regarding the limitation in the 'Limitations' section of the BNG Assessment Report, contrary to the Applicant's response, there is not a full explanation about the use of target notes for smaller areas of habitat and nor is there an explanation anywhere else in the BNG Assessment Report. Furthermore, the adopted methodology and use of target notes for smaller areas of	

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			habitat is not described in the ES Volume 3, Appendix 9-1: Ecological Baseline Report either as it should have been if the Applicant is relying on this approach and the use of very large MMUs. This is a significant omission from the description of the methodology employed. 5.63. The council therefore maintains its position in respect of the issues raised under WC-069 as the concerns raised have not been suitably addressed and the explanations in the Applicant's response have not been adequately substantiated.	
WC-090	Ecology and Biodiversity	Response to Written Representations	WC-070: Biodiversity Net Gain (BNG) 5.64. The Applicant's response confirms that the Minimum Mappable Unit of 400m2 for area-based habitats and 20m for linear features which was applied across the Solar PV Sites was also applied within the Cable Route Corridor (CRC). Whilst the	The Applicant notes the Council's comments and refers to the response provide to WC-089 above.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			confirmation of method is acknowledged, this evidently should have been clearly explained in the methodology of the relevant submitted DCO documents and comprises a considerable omission. 5.65. As detailed in the council's comments above in respect of WC-069, the council remains concerns regarding the MMU adopted and does not consider it has been sufficiently justified given that contrary to the indication from the Applicant, the method used does comprise a deviation from the UKHab Classification User Manual seeing as Version 2.0 published in July 2023 should have been complied with for Lime Down Solar Park.	
WC-091	Ecology and Biodiversity	Response to Written Representations	WC-071: Biodiversity Net Gain (BNG) 5.66. It is noted that the Applicant's response specifies: "The Applicant acknowledges that all individual	The Applicant notes this comment relating to the presentation of individual trees within **7.9 Statutory Biodiversity Metric (Rev 2) [REP1-091]**. The Applicant maintains that sufficient justification

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			trees comprising Irreplaceable Habitat have been grouped within a single row within the Statutory Biodiversity Metric [REP1-091]. These features were consolidated within the Metric, as with other habitat elements within the Scheme." 5.67. This is not considered to provide a robust rationale for the deviation from The Statutory Biodiversity Metric User Guide (Last updated: 3 July 2025) (hereafter referred to as 'the User Guide'). It also fails to explain or address why no explanation was presented in the 'user comments' column in the metric to justify why the trees have been grouped together in one row and why no explanation has been provided within paragraphs 1.3.6 1.3.7 or the Limitations section of the BNG Assessment Report [APP-273]. 5.68. The information now provided is noted. The Applicant indicates in	has been provided for the consolidation of all habitat rows (including trees) within the **Metric [REP1-091],** as stated in the response to WC-065 on pages 132 and 133 of **The Applicant's Response to Written Representation [REP2-039].**

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			their response that the Tree Helper was used. If so, it is unclear why it was blank and not completed within the submitted metric. Evidently it should have been completed within the metric to allow review of the information. 5.69. The council's concerns have not been overcome or adequately addressed in respect of this matter.	
WC-092	Ecology and Biodiversity	Response to Written Representations	WC-072: Biodiversity Net Gain (BNG) 5.70. The information now provided is noted and welcomed, given that it was omitted from the submitted Statutory BNG Metric [REP1-091].	The Applicant welcomes Wiltshire Council's comment.
WC-093	Ecology and Biodiversity	Response to Written Representations	WC-073 and WC-074: Biodiversity Net Gain (BNG) 5.71. The Applicant's responses are noted. Nonetheless, the council remains concerned regarding the consolidation of habitat rows within the submitted Statutory BNG Metric [REP1-091] and subsequent omission of individual habitat	The Applicant notes this comment. The Applicant maintains that sufficient justification has been provided for the consolidation of habitat rows within **Statutory Biodiversity Metric [REP1-091]**, and notes that this approach is in line with appropriate methodologies within the Statutory Biodiversity Metric QGIS Template

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			parcel references for the reasons already expressed and explained.	and GIS Import Tool – User Guide, as stated in responses to WC-073 and WC-074 on pages 155–160 of **The Applicant's Response to Written Representation [REP2-039]**.
WC-094	Transport and Access	Response to Written Representations	Highways and Transport 5.72. With regards to the Applicant's response to WC-011: Road Network and WC-088:HGV Construction Routes and Two-Way Passage Volumes, the council commented on the latest Transport Assessment within its Deadline 2 response [REP2-048]. This response included detailed comments on the swept path analysis undertaken for two 16.5m HGVs in Annex K. 5.73. Whilst the availability of satisfactory passage opportunities for a car / HGV along all the rural lanes should be regarded a 'minimum' level of highway safety safeguarding, it is not considered the 'worst case' scenario which the	The Applicant doesn't state that the booking system will completely remove the probability of two HGVs meeting. The booking system helps to reduce the probability of two HGVs meeting and is a standard element of most construction projects. The Applicant has submitted locations along construction routes showing two HGVs passing in **Annex K of ES Volume 3 Appendix 13-1: Transport Assessment (Rev 3) [REP3-065]**. As requested, the drawings now include road width geometry at the identified passing places, which demonstrate at least a 5.5 metre road width, as specified by Wiltshire Council.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			DCO proposals should address. Despite the best intentions of the proposed booking system, it is the Council's retained view that there will inevitably be occasions when two opposing HGVs will meet and a much higher risk of this occurring than exists now. The Applicant also refers to the latest Transport Assessment in response in stating: "Annex K in Volume 3, Appendix 13-1: Transport Assessment [REP1-057 and REP1-059] demonstrates where there is adequate carriageway width and / or passing place opportunity for two HGVs along the construction routes". As will be noted in the Council's comments on Annex K [REP2-048] the adequacy of these passing locations is disputed.	Further details of the proposed highway improvement works are included in **Annex K of ES Volume 3 Appendix 13-1: Transport Assessment (Rev 3) [REP3-065]**. This demonstrates the deliverability of the proposed works.
WC-095	Transport and Access	Response to Written Representations	5.74. With regards to the Applicant's response to WC-030: The Fosse Way, the council notes that the underlying calculations relating to the predicted HGV trip generations over the construction period and typical daily flows on	The Applicant makes note of this comment. The calculations undertaken to derive the number of PV Modules and Mounting Structures for each Lime Down site were based on indicative site layouts and contractor information.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			roads such as The Fosse Way remain an area under discussion with the Applicant.	In addition, an allowance has been made for off-site disposal of excavated spoil. Further clarification of trip calculations has been provided in **Annex E of ES Volume 3, Appendix 13-1: Transport Assessment (Rev 3) [REP3-065]** submitted at Deadline 3.
WC-096	Transport and Access	Response to Written Representations	5.75. With respect to the Applicant's response to WC-084 and WC-085: Protective Provisions, the council notes the now issued Draft Protective Provisions document for 'The Protection of the Local Highway Authority'. However, the council would prefer to have a specific 'overarching' s59 Agreement is place for highway damages redress, this setting out the full extent of the Highway Condition surveys and timing of these. As currently drafted in the Protective Provisions, the condition surveys as noted would appear to relate only to the highway extents within	As set out in the **Applicant's Response to Comments Received at Deadline 2 [REP3-129]**, (response SLD-082) section 59 of the Highways Act 1980 allows recovery of "excess expenses" for maintaining a highway due to "extraordinary traffic." However, the Applicant does not consider that an additional DCO Requirement for a formal section 59 Agreement is required, as road condition surveys and rectification are already secured through the CTMP process. The final CTMPs, which must be substantially in accordance with the **Outline**

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			the defined road work or cable works areas, so work zones indicated on the bespoke Work Area plans. This therefore excludes very large lengths of the narrow rural lanes being proposed for HGV construction access where over-run or structural damage is considered a high risk by the council. Whilst additional wording on condition surveys and timings has been incorporated within the revised 7.22 Outline Construction Traffic Management Plan (Rev 2) [REP1-112], this is not considered a substitute for a formal s59 Agreement under the Highways Act 1980 with supporting plans showing the full extent of the highway network to be monitored throughout the construction period.	**CTMP [REP3-108]**, are secured through Requirement 15 of Schedule 2 to the **Draft DCO [REP3-005]**. With respect to the extent of the condition surveys, the Applicant draws the Council's attention to the updated **Outline CTMP [REP3-108]** submitted at Deadline 3. The extent of the road condition surveys will be agreed with the local highway authority prior to commencement and as part of the Final CTMP(s). The **Outline CTMP [REP3-108]** sets out an expected scope of surveys covering the construction routes — including named lengths on the Lime Down A–C and Lime Down D routes — and expressly includes unmetalled highway surfaces forming part of the construction route, including at Fosse Way east of Hullavington crossroads and adjacent to Lime Down E. The survey scope is therefore not limited to the defined work zone areas on the Work Area

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				plans but extends across the construction access routes. In terms of timing, the **Outline CTMP [REP3-108]** commits to an independent pre-construction road condition survey to be undertaken two weeks before construction commences, independent interim surveys at six-monthly intervals during construction, and an independent completion survey to identify defects reasonably attributable to construction traffic. Any highway defects or structural failures attributable to construction activities will be corrected to the satisfaction of the local highway authority, either at completion or, if required for reasons of safety, during construction. The Applicant confirms that it has prepared draft protective provisions for 'The Protection of the Local Highway Authority', which were shared with Wiltshire Council, and the Applicant intends to include these within the **Draft DCO**

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				[REP3-005] at a future deadline pending agreement.
WC-097	Transport and Access	Response to Written Representations	5.76. Regarding the Applicant's response to WC-086: Protective Provisions, the issued Draft Protective Provisions document for 'The Protection of the Local Highway Authority' is noted and is under review by highway officers in Development Management, Network Management and the Area Highway Team (Maintenance).	The Applicant notes that Wiltshire Council's comments on the draft protective provisions shared were received on 12 June 2026. The Applicant has provided a revised draft to Wiltshire Council on 30 June 2026 and awaits its comments.
WC-098	Transport and Access	Response to Written Representations	5.77. With respect to HGV routing non-compliance the Applicant notes "The Applicant has also updated the Outline CTMP [REP1-112] at Deadline 1 to provide further detail on matters requested by Wiltshire Council. Section 6.14 includes further clarifications as to what monitoring / reporting / actions would be implemented in cases where proposed construction routes are not followed". The council has commented separately on the revised CTMP at Deadline 2 and	The Applicant makes note of this comment. Further details on monitoring and enforcement have been included at Section 6.14 of the updated **Outline CTMP (Rev 3) [REP3-108]** submitted at Deadline 3. Final agreement and detail on possible sanctions which could be applied to non-compliance after all suggested procedures set out in the updated Outline CTMP are exhausted will be included within the detailed and agreed in the Final CTMPs.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			commented on this [REP2-048]. To reiterate, the council response in part stated: "Given the legally binding powers under the DCO and OCTMP to comply with the prescribed HGV construction routes, it would be useful to understand what enforcement mechanisms can be applied and put in place beyond simple driver retraining. This seems rather 'light touch' and the power to impose fines against delivery operators consistently failing to comply with routing under the DCO or OCTMP would seem a more effective deterrent".	
WC-099	Transport and Access	Response to Written Representations	5.78. With respect to the Applicant's response to WC-089: HGV Volumes – Solar Farm Sites (Construction Phase), the council commented on the latest Transport Assessment within its Deadline 2 response [REP2-048], which includes the latest supporting calculations for the HGV trip generation predictions. This remains an area of concern.	The Applicant makes note of this comment. The calculations undertaken to derive the number of PV Modules and Mounting Structures for each Lime Down site were based on indicative site layouts and contractor information. In addition an allowance has been made for off-site disposal of excavated spoil. Further clarification has been provided in

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Annex E of **ES Volume 3, Appendix 13-1: Transport Assessment (Rev 3) [REP3-065]** submitted at Deadline 3.
WC-100	Transport and Access	Response to Written Representations	5.79. The council notes that in the Applicant's response to Reference 3.9.5 of the 8.2 Statement of Common Ground with Wiltshire Council [REP2-025], it states "In terms of excavated material, there will be no site wide reprofiling required. It has been assumed that any excavated material will be reused on site. In the event of any spoil being taken off site, where possible this will be undertaken by the same tippers used for incoming supply of aggregate". The council questions what impact on HGVs will it have if the same tippers cannot be used. Furthermore, 7.16 Outline Site Waste Management Plan (Rev 2) [REP1-102] and expressly Table 3 estimates that the volume of excavated soil that is likely to be deemed unsuitable for refill and compaction is circa 139,666 cubic metres. As this is	The waste assessment outlined in **ES Volume 1, Chapter 20: Other Environmental Matters [APP-072]** assumes that all excavated materials that has been listed as unsuitable for refill and compaction is waste and would be sent to landfill. HGV trip generation calculations assume that excavated materials listed as unsuitable for refill and compaction will be stored on site, with a worst-case assumption that 10% would be taken off site.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			defined as a Waste Type, then it would not be unreasonable to assume that the entirety of this volume, or at least a proportion, would need to be exported off-site by HGVs. This seems to contradict the Applicant's assertion that "any excavated material will be re-used on site".	
WC-101	Cultural Heritage	Response to Written Representations	Cultural Heritage 5.80. With regards to the Applicant's response to WC-083, paragraphs 1 and 2 of the response are noted and not disputed. 5.81. However, with regards to paragraph 3, regarding the site visit to Grittleton House, the council disagrees with the assessment that there are "some limited views between the Grittleton House and agricultural land within the cable route, including the southern part of a compound area". The council notes that there are a number of trees along the boundary which provide	While some impact from noise during construction is expected it would be limited to the use of the closest access point along the Cable Route Corridor which, with reference to paragraph 1.5.28 of **Appendix 13-1: Transport Assessment [REP3-065],** would be 90 non-consecutive days within the programme. Typical construction noise levels at the closest property in Grittleton to the works are expected to be 56 dB L_{Aeq}, as seen from R46 in Table 14-19 of **Chapter 14: Noise and Vibration [REP1-021].** This is approximately the level associated with regular conversation.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			intermittent screening in summer months, but that there is no hedgerow other than the relatively short length of the hedge screening the tennis courts within the boundary of the house. The cable route runs across the full length of the field of view consistent with the front elevation of the house and views of construction and of parts of the construction compound whilst the works are ongoing, from the high status bay window at the head of the stairs on the first-floor landing and from principal bed chambers and also from areas of the grounds, will be clear and significant. The visual impact would be greater if the works were to be carried out in the winter when tree cover would be reduced. In addition, construction will be visible and obtrusive in the views of the house which are available from footpath GRIT20. There is also expected to be some impact from noise during construction which will	While the Applicant agrees that the potential for a visual impact has the potential to be greater during the winter months when vegetation is at its lowest, the Applicant disagrees that the full length of the field of view to the east of Grittleton House is visible from the property. Parts of two fields are visible from the house, resulting in fragmented sections of the cable route and the southernmost section of the compound being visible. It should be noted that modern intervention, in the form of tennis courts and sports pavilion, are located between the house of the proposed cable corridor and compound.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			impact on the ability to experience the asset within its otherwise rural setting.	
WC-102	Cultural Heritage	Response to Written Representations	5.82. The Applicant's response notes that "the Applicant considers that the existing screening provided by the existing hedgerow and trees, along with the temporary nature of works as a result of the installation and cabling would not effect how the asset is experienced within its wider agricultural setting". The council disagrees – Grittleton House was designed, constructed and occupied as a country house within a picturesque rural landscape. Its location would have been selected to provide extensive and attractive views across the owner's land holdings and architectural features such as the bay windows were intended to enhance enjoyment of the rural setting. The cable route and compound occupy an area running across the full field of view from the principal garden frontage and this	As detailed in their response to WC-083 **[REP2-039]**, Grittleton House (NHLE 1022310) is considered within **ES Volume 3, Appendix 12-1: Heritage Statement [APP-219]**, which assesses its significance, setting and historic relationship with parts of the wider Grittleton Estate. The assessment concludes that, whilst the asset has a historic association with some land within the Scheme, it no longer maintains a relationship with those lands. During the site visit it was noted that parts of two fields are visible from the house, resulting in fragmented sections of the cable route and the southernmost section of the compound being visible. As such much of the wider agrarian landscape to the east of the asset would not be altered as a result of the Scheme. It should also be noted that any effects

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			makes a significant contribution to the setting of the asset as an essential element of the landscape within which was designed to be viewed experienced. The impact from the construction and compound will be intrusive within this rural setting and will reduce the ability of those owning, working in or visiting the property to experience the asset as it was experienced historically. As a result there will be some harm to the significance of the asset, albeit that this will be temporary in duration.	associated with construction activity in the vicinity of Grittleton House would be temporary and localised in nature and would occur during the construction phase only.
WC-103	Cultural Heritage	Response to Written Representations	5.83. It is understood that this impact will be relatively short-lived given that the construction works and occupation of the compound will be temporary. It is further noted that the removal of the compound and making good of the cable route following construction mean that there will be no lasting impact on the landscape. However, while the Applicant has relied upon the temporary nature of the works in reaching the conclusion that the	As detailed in **ES Volume 3, Appendix 12-1: Heritage Statement [APP-219]**, the Applicant has identified that while Grittleton House (NHLE 1022310) has a historic association with some land within the Scheme, it no longer maintains a relationship with those lands, as such no impact has been identified to the significance of asset.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			works "will not effect [affect] how the asset is experienced" it is noted there are no specific controls over the length of time for construction or occupation of the compound. The council has also previously noted in its Comments on Submissions received at Deadlines 1 and 1A [REP2-048] that the update to Table 6 of the 7.12 Outline Construction Environmental Management Plan (Rev 2) [REP1-096], which is intended to address impacts from construction compounds and which provides guidance to the contractor to undertake works as far away from the assets as reasonably practicable, is advisory in nature and does not secure any certainty in respect of the impacts from construction compound areas and cannot be considered as providing any additional mitigation of the potential harm. There is therefore some uncertainty regarding the duration and level of the impact. Noting that it is, however,	The Applicant notes WC comment that the nature of works will be temporary, that there will be no lasting impact on the landscape, and that "the overall impact in the medium / long-term on the heritage significance of the asset resulting purely and directly from the construction itself, would be limited". Measures relating to construction timing, working practices, remediation and reinstatement are secured through the **Outline CEMP [REP3-092]**. The Applicant will continue to discuss with WC the wording of the outline CEMP any additional mitigation that can be considered.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			ultimately both temporary and reversible, the overall impact in the medium / long-term on the heritage significance of the asset resulting purely and directly from the construction itself, would be limited, albeit that there would be a considerable impact from the construction within its immediate setting for a short length of time.	
WC-104	Cultural Heritage	Response to Written Representations	5.84. However, the Grade II* listed house is currently in use as a country house hotel and venue and its conservation via its future maintenance and repair in good condition relies upon the continuing viability of this business. Clearly there could be other benign uses which might occupy the building in time should be current use fail but there is no certainty that this would be the case or over the length of time that this might take. High maintenance assets of this type can and do fall into considerable disrepair during periods of disuse, which could make it less attractive for future	As detailed in **ES Volume 3, Appendix 12-1: Heritage Statement [APP-219]**, the Applicant has identified that the Scheme would not impact on the significance of the Grade II* Listed Grittleton House (NHLE 1022310). Whilst an assessment of the impact on the business at Grittleton House has not been specifically undertaken, **ES Volume 3: Appendix 16-2 Tourism and Recreation Receptor Tables [APP-241]** finds a medium-term temporary moderate minor adverse to the Grittleton Conservation Area as a visitor attraction. This is not a

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			occupation and prejudice its future. It is understood (anecdotally from the current owners) that the current business runs at the margins of viability and any disruption, such as could happen if the attractiveness of the building for its primary use as a wedding venue was called into question in public opinion, could have a significant impact on the long term viability of the business and hence the conservation of the building. The National Planning Practice Guidance notes that "In the case of buildings, generally the risks of neglect and decay of heritage assets are best addressed through ensuring that they remain in active use that is consistent with their conservation." (Paragraph: 002) and continues to note that "When assessing any application which may affect the setting of a heritage asset, local planning authorities may need to consider …….the fact that developments which materially detract from the asset's	significant effect. This is due to views of the construction compound on roads and PROWs on approach to the conservation area, and increased HGV traffic associated with the Scheme on roads within and approaching the village. The Applicant has also taken site visits to Grittleton House, and the Cable Route Corridor to assess the visual relationship between the works areas and Grittleton House, and confirms that existing screening provided by hedgerow and trees within the Grittleton Estate, along with temporary nature of works as a result of the installation of cabling would substantially mitigate a large proportion of visual impacts to users of Grittleton House. Good working practice, secured through the **Outline CEMP [REP3-092]** by Requirement 13 of Schedule 2 to the **Draft DCO [REP3-005]**, would also substantially mitigate noise and air quality impacts associated with construction works .

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			significance may also damage its economic viability now, or in the future, thereby threatening its ongoing conservation." (Paragraph: 013).	Therefore, the Applicant does not consider it likely there would be a significant adverse effect to the business operations at Grittleton House. The Applicant is committed to ongoing engagement with the owners of the Grittleton House, and to the implementation of mitigation measures around the precise location of stockpiling which could have a visual impact, the, timing of activity and noise implications associated with the installation of trhe cabling in this location. The Applicant is confident that through these measures, there would be minimal impact to the long term viability of the business.
WC-105	Cultural Heritage	Response to Written Representations	5.85. The council therefore considers that the Applicant should work with Grittleton House's owners to identify additional and more robust and effective management proposals which could assist in mitigating the impact from the scheme on the business and hence on the future	The Applicant is open to establishing dialogue between the Applicant and owners or business operators of Grittleton House to ensure information around the extent and timing of construction works on the Cable Route Corridor, and the use of the proposed construction compound, can be

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			viability and conservation of the asset. These could include measures such as consideration of alternative sites for the construction compound, limiting the area of construction served by this particular compound to reduce the time during which it is in use, providing greater certainty over the timing and / or length of the construction of the section of the cable route directly within the field of view from the house and during which the compound will be active.	effectively communicated. This would be to allow for the operators of Grittleton House to be confident that the Scheme is not likely to significantly impact on their business. This would include assurance that construction activities can be adapted to respond to or avoid major events being held, and to ensure that mitigation secured through the **Outline CEMP [REP3-092]** by Requirement 13 of Schedule 2 to the **Draft DCO [REP3-005]** is fully implemented in a location-specific manner. The Applicant is committed to ongoing engagement with the owners of the Grittleton House, and to the implementation of mitigation measures around the precise location of stockpiling which could have a visual impact, the, timing of activity and noise implications associated with the installation of trhe cabling in this location.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
WC-106	Cultural Heritage	Response to Written Representations	5.86. Paragraph 4 is noted. The 7.22 Outline Construction Traffic Management Plan (Rev 2) [REP1-112] has been updated (a provision referred back to as noted here in the 7.12 OCEMP (Rev 2) [REP1-096]) to include a requirement that the design of the works to the access track from Rodbourne Road to the Lime Down E (Works number 8b) will the undertake in consultation with the Conservation Officer. However, as the council has already noted its Comments on Submissions received at Deadlines 1 and 1A [REP2-048] in respect of the update to Table 6 of the 7.22 OCTMP (Rev 2) [REP1-112] "It is unclear what the mechanisms would be for ensuring this occurs, how much ability the Conservation Officer would have to influence the design and / or what would happen if there was any conflict of opinion. Whilst the provision is welcomed and has potential to allow some influence over the nature of the works, it	See response to WC-054

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			clearly cannot necessarily reduce the potential impact to the character and appearance of the Conservation Area. In addition, it does not provide any commitment to the reinstatement of the rural character of the track and junction following construction or, at worst, at decommissioning." 5.87. Paragraph 5 is noted and not disputed.	
WC-107	Construction and Decommissioning	Response to Written Representations	Construction and Decommissioning 5.88. The Applicant's response to WC-098 does not seem to relate the content of the council's comment. The council notes that the Applicant has not responded to its proposed wording for the Requirements relating to 'Commencement of the authorised development' and 'Phasing of the authorised development and date of final commissioning'. The council awaits a response from the Applicant.	The Applicant notes the error in its **Response to Written Representations [REP2-039]** in respect of WC-098. Requirement 2(1) as currently drafted in the **Draft DCO [REP3-005]** already provides that: "The authorised development must not be commenced after the expiration of the applicable period." The defined term "applicable period" means the period of five years beginning on the day on which this Order comes into force and includes any extension applied by section 4A (extension of time limit during challenge) of the 1965 Act

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				or section 5B (extension of time limit during challenge) of the 1981 Act. The Applicant considers that the use of the defined term "applicable period" is preferable, as it incorporates the statutory extensions to the commencement period that arise where the Order is subject to legal challenge. The Applicant does not therefore propose to adopt Wiltshire Council's suggested wording in this respect, as it considers the current drafting already achieves the Council's objective. With regard to Wiltshire Council's comment made in relation to phasing, the Applicant notes that Requirement 2(2) and (3) as currently drafted already provide that no part of the authorised development may commence until a written scheme setting out the phase or phases of construction has been submitted to the relevant planning authority, and that the scheme must include a timetable for construction and a plan

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				identifying the phasing areas. Requirement 2(4) already requires the undertaker to notify the relevant planning authority within fourteen days of the date of final commissioning. No amendment to the current drafting is therefore proposed.
WC-108	Construction and Decommissioning	Response to Written Representations	5.89. Similarly, the Applicant's response at WC-099 does not address the council's concerns regarding decommissioning and land restoration, including the need for a financial bond and / or charge on the land to be secured. This has previously been stated in the council's correspondence with the Applicant on the draft DCO and as contained within its Relevant Representation [RR-4934]. The council notes that the ExA First Written Questions also seek views from the council on whether Requirement 20 should include an Outline Restoration Plan.	As noted in its response to WC-099 in the **Applicant's Response to Written Representations [REP2-039],** the Applicant amended Requirement 20 (Decommissioning and restoration) at Deadline 1 to prevent the operational lifetime of the authorised development being extended by later-commissioned ancillary works. The Applicant does not consider that a DCO Requirement for a separate financial bond and/or charge on the land is necessary to secure decommissioning and restoration. Decommissioning obligations are secured through the private

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				agreements with the landowners, which include decommissioning securities to cover decommissioning costs in the event that the Applicant breaches its obligations or becomes insolvent. The amount of the decommissioning security will be regularly re-valued throughout the lifecycle of the development and topped up if necessary. The Applicant therefore considers that adequate financial security for decommissioning and restoration is already in place through those private arrangements, and that a further DCO Requirement in this respect is neither necessary nor proportionate. In its **Response to the ExA's First Written Questions [REP3-128]** DCO1.47 on whether Requirement 20 should include an Outline Restoration Plan, the Applicant set out its position that such a plan would duplicate measures already secured through the **Outline Decommissioning Strategy**

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				[REP3-096]. The Outline Decommissioning Strategy already provides for the land to be returned to its original use and condition as far as practicable and returned to the landowner, and includes detailed tables setting out how that restoration will be achieved. An Outline Restoration Plan as a separate document is therefore unnecessary, and the Applicant does not propose to amend Requirement 20 in this respect.
WC-109	Description and DCO Process	Book of Reference and Land Matters	Book of Reference and Land Matters 5.90.The council notes the Applicant's response, although this does not address the council's query of the accuracy provided in the Book of Reference. The council notes that this is something which the ExA have flagged up in their Written Questions at CA1.17.	In respect of Wiltshire Council's query regarding plots **03-004**, **03-007** and **03-009**, the Applicant confirms that the data available identifies Public Footpath SHER18 as running to the south of these plots. Accordingly, SHER18 is not located within the queried plots but is instead correctly included within plots **01-042**, **03-001**, **03-006** and **03-008**, as set out in the Book of Reference **[REP3-009]** and consistently presented in subsequent versions. The

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Applicant is therefore satisfied that the alignment of SHER18 has been accurately reflected within the land referencing documentation. In relation to Wiltshire Council's concerns regarding the accuracy of the Book of Reference. The Applicant confirms that on plot **03-049**, Wiltshire Council has been included in respect of this plot on the basis that available data indicates that Public Byway LUCK57 runs through the northern part of plot **03-049**. The inclusion of Wiltshire Council reflects its role as the relevant interest in respect of this recorded public right of way. This approach has been consistently applied in the Book of Reference **[REP3-009]** and all subsequent versions.
WC-110	Ecology and Biodiversity	Great Crested Newt Impact Assessment	6. 9.24 CONFIDENTIAL Great Crested Newt District Level Licence Impact Assessment and Conservation Payment Certificate	The Applicant notes this comment. It is acknowledged that submission of the IACPC with the original DCO may have helped to provide

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			(IACPC) [REP2-041] 6.1. The Covering Letter states: "Great Crested Newt District Level Licence Impact Assessment and Conservation Payment Certificate The Applicant has submitted the Great Crested Newt District Level Licence Impact Assessment and Conservation Payment Certificate (IACPC) [EN010168/EXAM/9. 24] at Deadline 2. Due to the sensitive information contained within the certificate, this document is submitted as confidential. The Applicant notes that the certificate has been signed by both the Applicant and Natural England, confirming Natural England's involvement in the preparation and agreement of the document. Please note that Wiltshire Council has been provided with an unredacted version of the payment certificate to demonstrate progress on this issue." 6.2. The Impact Assessment and Conservation Payment Certificate (IACPC) was emailed to Wiltshire Council (WC)	greater certainty with respect to the originally submitted information. With regard to the survey information submitted to Natural England to support the DLL Enquiry, the Applicant confirms that this comprised great crested newt presence/absence data obtained through eDNA surveys of ponds within the Solar PV Sites and accessible ponds located within 250 m of the Solar PV Sites. Details of these surveys are presented in **ES Volume 3, Appendix 9-5 Great Crested Newt Survey Report [APP-202].** However, only survey data from ponds that were both within or close to the Solar PV Sites and within 250 m of the Cable Route Corridor (CRC) were relevant to the DLL Enquiry, as only the CRC will be registered under the DLL. Consequently, only data from these ponds were submitted to Natural England.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			by the Applicant's ecological consultant on 6th May 2026. The council's Ecology Officer responded on 13th May 2026 to advise that a couple of observations regarding the IACPC had been added into the initial Statement of Common Ground (SoCG) between the Applicant and Wiltshire Council. 6.3. The council had also previously provided comments regarding great crested newt (GCN) and the requirements in respect of mitigation, as well as queries regarding whether an IACPC had been obtained, in the Local Impact Report (LIR) [REP1-137] and Written Representation [REP1-138] submitted at Deadline 1. 6.4. In relation to the IACPC, the council's in the initial SoCG under reference 3.5.17 are as follows: "Confirmation that the Applicant intends to use Natural England's GCN District Level Licensing Scheme (DLL) in respect of the CRC is acknowledged and	Survey data from ponds located within 250 m of the Solar PV Sites but beyond 250 m of the CRC were not submitted, as they were not relevant to the DLL Enquiry. In addition, ponds located beyond 250 m of the Solar PV Sites but within 250 m of the CRC were not surveyed. Schemes may be registered under the DLL with or without survey information. In summary, for the purposes of the DLL Enquiry, eDNA presence/absence data were submitted for: • Ponds located within 250 m of both the Solar PV Sites and the CRC. Survey data were not submitted for: • Ponds located within 250 m of the Solar PV Sites but beyond 250 m of the CRC; and • Ponds located beyond 250 m of the Solar PV Sites but within 250 m of the CRC.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			welcomed as this clarification had not been provided within the PEIR and as such, the Council's statutory consultation response had queried this point. Nevertheless, the required Impact Assessment and Conservation Payment Certificate (IACPC) from Natural England should have been obtained by the Applicant and submitted with the DCO application. ES Chapter 9 specifies that there is intention to apply to use the DLL but it does not stipulate that an application for a IACPC has been submitted to date. The omission of the necessary IACPC in support of the DCO application is considered an important issue for the reasons detailed in the Council's Relevant Representation (January 2026). A copy of the IACPC was emailed to Wiltshire Council on 6 May 2026. There are a couple of discrepancies noted in the IACPC. Firstly, Section 2.1 states there are no ponds within the proposed site	

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			boundary (which for the purposes of the IACPC is the CRC) and Section 2.2 states that the total number of ponds within 250m buffer around the proposed site boundary is 150, whereas paragraph 3.3.59 of ES Volume 3, Appendix 9-1: Ecological Baseline Report [APP-198] stipulates that approximately 130 waterbodies were identified within the CRC and surrounding 250m. Secondly, Section 3.1 of the IACPC indicates that the DLL enquiry has been submitted with survey information, (which means Habitat Suitability Index ((HSI)) information, presence/absence survey data, population class (if GCN present). This has implications for how the remainder of the form has been completed and what has been agreed with Natural England (NE). However, the DCO application has not been accompanied by any such GCN survey information pertaining to the CRC and instead indicates there	

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			has been no species-specific survey in respect of the CRC. Given that Annex 3 to the IACPC provides figures which relate to the entire Order Limits rather than just the boundary of the CRC to which the application to use DLL applies, it is assumed that GCN survey information for the Solar PV Sites was submitted to the NE with the DLL application and that this accounts for why it is has been stated in the IACPC that survey information has been provided. Clarification on this matter should be sought." 6.5. Following Wiltshire Council's input into the initial draft of the SoCG, the council did not have sight of the subsequent responses and amendments provided by the Applicant until it was published at Deadline 2 [REP2-025]. Thus, the responses provided by the Applicant to the points raised by the council in the SoCG regarding the IACPC have been reviewed to	

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			inform the preparation of the comments herein.	
WC-111	Ecology and Biodiversity	Great Crested Newt Impact Assessment	6.6. It is noted that the Applicant's response to the first query raised by the council in the SoCG regarding the IACPC needlessly explains that where ponds will not be directly impacted they are excluded from the DLL 'site boundary' by Natural England and that the site boundary is not contiguous with the Order Limits in this case, whereas the query raised by the council actually related to the discrepancy between Section 2.2 of the IACPC and paragraph 3.3.59 of ES Volume 3, Appendix 9-1 [APP-198] in respect of the total number of ponds within the 250m buffer of the site boundary i.e. the cable route corridor. The Applicant's response in the SoCG then states: "A number of ponds associated with the Solar PV Sites are also present within 250 m of the of the Cable Route Corridor. As a point of clarity, paragraph 3.3.59 of ES Volume 3,	The Applicant notes the Council's comment and refers to the above response to WC-110 on the survey information submitted for the DLL Enquiry.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			Appendix 9-1: Ecological Baseline Report [REP1-083] refers to ponds within 250m of the Cable Route Corridor, excluding those ponds associated with the Solar PV Sites which are separately described. However, for the purposes of the DLL, all ponds within 250 m of the Cable Route Corridor are considered as part of the impact assessment regardless of their location relative to other elements of the Scheme. As a result, more ponds are captured in the IACPC than have been described as being associated with the Cable Route Corridor in ES Volume 3, Appendix 9 1: Ecological Baseline Report [REP1-083]." 6.7. The Applicant's response is noted, however, paragraph 3.3.59 does not in fact specify or make it clear that the count of ponds within 250m of the CRC excludes those 'associated with the Solar PV Sites'. As such, contrary to the suggestion in the Applicant's response, it is not really a point of	

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			clarity because the required information had not been explicitly provided in ES Volume 3, Appendix 9-1: Ecological Baseline Report or indeed elsewhere hence why Wiltshire Council raise the matter of the apparent discrepancy in Section 2.2 of the IACPC. For the avoidance of doubt, paragraph 3.359 of ES Volume 3, Appendix 9-1 [APP-198] in its entirety is as follows: "During the desk-based assessment, approximately 130 waterbodies were identified within the Cable Route Corridor and surrounding 250 m. District Level Licensing will be utilised for works within the Cable Route Corridor, which assumes the presence of GCN within local waterbodies and stipulates mitigation and compensation measures to reduce and offset impacts on this species. As such no surveys to determine the presence or likely absence of GCN have been undertaken for ponds within the Cable Route Corridor."	

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
WC-112	Ecology and Biodiversity	Great Crested Newt Impact Assessment	6.8. In terms of the council's second query regarding the IACPC as detailed in the SoCG, it is recognised that the Applicant's position has been updated in the SoCG [REP2-025] to state: "The Applicant confirms that survey information submitted to Natural England in support of the DLL enquiry comprised the GCN presence / absence surveys of ponds at the Solar PV Sites as detailed in ES Volume 3, Appendix 9-5: Great Crested Newt Survey [APP-202]." 6.9. However, earlier within the same updated position statement from the Applicant in the SoCG, it is specified: "The IACPC contains an 'Impacts Plan' corresponding with the Cable Route Corridor elements of the Order Limits." As such, given that the IACPC clearly sets out that the great crested newt (GCN) district level licensing (DLL) application to Natural England (NE) pertains to the CRC element of the Scheme only, the council	The Applicant notes the Councils' comment and refers to the above response to WC-110 on the survey information submitted for the DLL Enquiry in relation to the CRC. Where Applicants making a DLL enquiry have relevant survey information (including partial information as is the case for the Scheme) it is not possible for the DLL to follow the 'no survey' route.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			maintains its view that it follows that only survey information relating to the CRC, rather than survey information relating to the Solar PV Sites, would qualify as supporting survey information and that therefore, Section 3.1 of the IACPC application form should have been completed to state that no survey information had been submitted and the remainder of the form should have followed suit. 6.10. As such, whilst the council notes the response from the Applicant to this query, it does not consider that this adequately addresses the issue or answers the query, and the council remains concerned that the IACPC may have been completed incorrectly and in a manner that suggests a greater level of pertinent supporting ecological baseline information was provided than was the case given that for the purposes of the IACPC, supporting survey information would have to relate to the CRC. It is recognised	

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			that NE has nevertheless signed the IACPC on 30th April 2026, but the ExA may wish to seek clarity on this matter from either the Applicant and / or NE.	
WC-113	Hydrology, Flood Risk and Drainage	Response to Lead Local Flood Authority	7.1. The Lead Local Flood Authority (LLFA) maintains that: • The Applicant's position relies heavily on policy interpretation with limited site-specific quantitative evidence demonstrating no increase in flood risk. • The separation of panel areas from infrastructure does not fully consider integrated hydrological behaviour across the site. • Dependence on management measures introduces uncertainty over long-term performance, which is not quantified. • Potential cumulative runoff impacts across the full site extent are not explicitly assessed. • Limited evidence is provided demonstrating control of preferential flow pathways. • Panelled areas contribution to runoff is not quantified, creating	The matters raised at paragraph 7.1 substantially repeat the LLFA's position in **Hydrology, Flood Risk and Drainage Response to LLFA Comment WC-053 Raised in Deadline 2 Submissions [EN010168/EXAM/9.47]**. . Paragraph 7.2 similarly repeats the conclusion at WC-054. The Applicant relies on its responses in **Hydrology, Flood Risk and Drainage Response to LLFA Comment WC-053 Raised in Deadline 2 Submissions [EN010168/EXAM/9.47]** and WC-054 in full. Those responses address the site-specific evidence, treatment of panelled areas, proportionality of hydraulic modelling, cumulative runoff, soil compaction, exceedance routing, cable route

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			uncertainty in compliance with EN-1. • No scenario testing or sensitivity analysis is presented to demonstrate robustness of outcomes. • Site-specific variability such as soil and slope is not assessed consistently at a detailed level. • Reliance on precedent is not supplemented with direct site validation evidence. • Scale of development suggests need for additional quantitative analysis. • Interaction between cable corridors and drainage features is not explicitly assessed. • Potential compaction effects during construction are not sufficiently evidenced quantitatively. • No modelling of overland flow routing under extreme rainfall events is presented. • Drainage connectivity between parcels is not clearly demonstrated.	and land drainage interactions, ordinary watercourses, functional floodplain, SuDS, climate change, monitoring, maintenance and the securing of mitigation through the DCO. The Applicant also relies on the **Applicant's Response to Lead Local Flood Authority on Hydraulic Modelling Requirements [REP2-045]**, which sets out the applicable national policy, peer-reviewed evidence, site-specific assessment approach, limitations of field-scale modelling and the reasons why direct control of soil condition, vegetation cover and flow connectivity provides the more reliable approach. The LLFA's current comment does not substantively engage with that technical explanation. It restates the requirement for further quantitative assessment but does not identify which part of the Applicant's reasoning is considered

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			• Long-term maintenance effectiveness is assumed but not validated through evidence. • Potential exceedance flow behaviour is not fully discussed. • There is limited demonstration of how SuDS principles apply across panel areas. • The risk of erosion at drip lines is acknowledged but not quantified for the site. •Localised flood impacts are not assessed in combination across catchments. •There is no clear validation of ground condition assumptions across all parcels. •Evidence does not fully demonstrate resilience under climate change scenarios. •Functional floodplain interactions with infrastructure are not consistently explored. •There is limited clarity on how mitigation measures will be enforced and verified. • No spatial representation of runoff pathways is included.	incorrect, provide contrary site-specific evidence or explain how the requested assessment would overcome the uncertainties identified in **Applicant's Response to Lead Local Flood Authority on Hydraulic Modelling Requirements [REP2-045]**. The additional or materially differently expressed points are addressed below. • **The separation of panel areas from infrastructure does not fully consider integrated hydrological behaviour across the site.** The distinction between panelled land and formal infrastructure reflects their different runoff mechanisms. It does not mean that they have been assessed independently. Panelled fields continue to drain to the underlying land and are not connected into a positive drainage system. The BESS, substations and other formal impermeable

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			•Hydrological interactions with existing drainage networks are not detailed. •Assumptions on permeability remain untested for worst-case conditions. •Potential impacts on ordinary watercourses are not systematically assessed. •There is insufficient demonstration that all flood risk mechanisms are addressed holistically. •The absence of integrated catchment-wide modelling limits understanding of system behaviour. •The overall approach may not fully evidence compliance with no increase in flood risk requirement. 7.2.This raises uncertainty in demonstrating compliance with NPS EN-1 requirements to ensure no increase in flood risk. Further site-specific quantitative evidence, modelling (where proportionate), and clear secured design / mitigation measures are required to provide confidence to the LLFA	areas create defined drainage catchments requiring collection, attenuation and controlled discharge. Access tracks, overland flow pathways, field drainage, watercourses and downstream receptors have been considered in relation to both. Their combined effects are assessed in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP3-015]** and the **ES Volume 3, Appendices 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy [REP3-039, REP3-049, REP3-051, REP3-053, REP3-055, REP3-057, REP3-059, REP3-061 and REP3-063]**. Distinguishing the components allows each mechanism to be assessed using the appropriate method before the combined and cumulative effects are considered.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			that flood risk will not be increased elsewhere.	• **Limited evidence is provided demonstrating control of preferential flow pathways.** Preferential flow will be controlled by retaining existing overland flow routes, maintaining vegetation beneath and between the panels, remediating compacted or eroded ground and avoiding uncontrolled connections to field drains, ditches and watercourses. Access tracks will be permeable and generally constructed at existing ground level. Cross-drainage will be provided where a track could otherwise intercept or redirect an established flow route. During construction, runoff will be intercepted and treated using physical measures such as cut-off drainage, bunds, check dams, silt fencing and settlement features where required. These controls are secured through the **Outline Construction Environmental Management Plan [REP3-092]**, **Outline Soil Resources Management Plan**

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				[REP3-098], **Outline Landscape and Ecology Management Plan [REP3-100]** and **Outline Operational Environmental Management Plan [REP3-094]**, together with Requirements 12, 13, 14 and 18 of the **Draft Development Consent Order [REP3-005]**. The relevant flood risk figures and site-specific drainage sections will also be updated to show existing drainage features, mapped surface water pathways and exceedance principles more clearly. • **Reliance on precedent is not supplemented with direct site validation evidence.** Precedent is not the primary basis of the Applicant's conclusions. It demonstrates that the risk-led approach is consistent with the treatment of comparable solar NSIPs. The assessment itself is based on site-specific soil, land use, LiDAR, topography, slope, catchment, drainage, watercourse, flood

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				mapping and Scheme layout information. Hydraulic modelling and quantitative calculations have been undertaken where a defined hydraulic mechanism can be represented reliably. The physical conditions controlling runoff will also be verified directly. Soil condition will be inspected during construction and compaction or poor reinstatement remediated. Vegetation establishment will be monitored, and operational inspections will identify erosion, bare ground, rilling, blockage of drainage features or preferential flow. These controls are secured through the detailed SRMP, LEMP and OEMP under the **Draft Development Consent Order [REP3-005]**. • **The scale of development suggests the need for additional quantitative analysis.** The Applicant has addressed the relationship between the scale of the Scheme and the appropriate level of quantitative assessment in

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				the **Applicant's Response to Lead Local Flood Authority on Hydraulic Modelling Requirements [REP2-045]** and at WC-053. The LLFA's comment assumes that the extent of the panelled areas requires broader field-scale quantitative analysis but does not substantively engage with the Applicant's technical explanation or the evidence on which it is based. It does not identify which part of the Applicant's reasoning is considered incorrect, provide contrary site-specific evidence or explain how the requested assessment would overcome the uncertainties identified in **Applicant's Response to Lead Local Flood Authority on Hydraulic Modelling Requirements [REP2-045]**. The Applicant's approach is supported by the peer-reviewed evidence reviewed in that document. The evidence consistently shows that the

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				hydrological response of land beneath solar arrays is governed principally by ground cover, soil condition, compaction, surface roughness and connectivity, rather than by the presence of raised panels alone. Cook and McCuen found that changes in runoff volume and peak discharge were negligible where grass cover was maintained, while larger increases arose where the receiving ground was degraded to gravel or bare soil. Yavari et al. and Gullotta et al. similarly identify runoff response as site-specific and management-dependent, with increased peak flows associated with deterioration in ground cover, roughness and soil condition. Elamri et al. and Baiamonte et al. identify localised drip-line concentration as a potential risk where the receiving ground is bare or poorly vegetated. This reinforces the need to maintain vegetation and avoid compaction rather than

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				demonstrating that panelled land should be treated as impermeable. This evidence is consistent with the solar-specific policy position in NPS EN-3. Paragraph 3.10.75 recognises that solar PV panels drain to the existing ground and that the drainage impact will not, in general, be significant. Paragraphs 3.10.76 and 3.10.77 identify the appropriate controls, including permeable access tracks, localised SuDS where recommended and avoidance of impacts on existing drainage systems and watercourses. The Applicant has applied that evidence and policy position to the site-specific conditions at Lime Down. Soils, slopes, surface water pathways, drainage features and connectivity have been assessed for each parcel. Construction compaction, vegetation condition and preferential flow are directly controlled through the CEMP, SRMP, LEMP and OEMP, while impermeable infrastructure and

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				defined watercourse interactions are subject to quantitative drainage or hydraulic assessment. The scale of the panelled areas does not change the underlying runoff mechanism or remove the limitations of attempting to model future management-dependent ground conditions. A broader field-scale assessment would still require assumed spatial values for vegetation, compaction, roughness, infiltration and connectivity and would remain highly sensitive to those assumptions. The LLFA has not specified: • a recognised methodology for modelling runoff from raised solar panels at field scale; • how panel-edge rainfall redistribution should be represented; • how future soil compaction, vegetation condition and surface roughness should be parameterised;

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				• how connectivity to tracks, field drains, ditches and watercourses should be represented; • which scenarios should be tested; • how the model would be calibrated or validated; or • the quantitative acceptance criteria against which the results would be assessed. Quantitative analysis has instead been targeted at locations where the hydraulic mechanism and relevant inputs can be defined, including Gauze Brook, Gabriel's Well, smaller ordinary watercourses and the formal impermeable drainage catchments. The LLFA has not provided a technical rebuttal of that evidence-led and risk-based approach or demonstrated that broader field-scale modelling would provide more reliable information. The Applicant therefore does not agree that the scale of the panelled areas, of itself, establishes a

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				requirement for additional quantitative analysis. • **No modelling of overland flow routing under extreme rainfall events is presented, and no spatial representation of runoff pathways is included.** Surface water pathways have been assessed using Environment Agency mapping, National Flood Risk Assessment data, LiDAR, site topography, catchment boundaries and existing drainage features. These datasets identify areas where rainfall exceeds infiltration and flows overland during extreme events and have informed the siting of infrastructure and retention of existing flow routes. Blanket two-dimensional modelling of every panelled field is not considered proportionate where no specific local flood mechanism has been identified. Targeted hydraulic modelling has been undertaken where justified, including at Gauze Brook, and further modelling is being progressed at Gabriel's Well.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				The relevant **ES Volume 2, Figures 11-1 to 11-8: Flood Risk Maps [APP-135 to APP-142]** and site-specific drainage sections will be updated to present the mapped flow routes, drainage features and exceedance principles more clearly. The final exceedance routing for formal drainage systems will be defined through the detailed drainage design approved under Requirement 11 of the **Draft Development Consent Order [REP3-005]**. • **Drainage connectivity between parcels is not clearly demonstrated, localised flood impacts are not assessed in combination across catchments, and the absence of integrated catchment-wide modelling limits understanding of system behaviour.** The Solar PV Sites occupy separate local catchments and do not discharge through a common Scheme drainage network. The site-specific **ES Volume 3,**

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Appendices 11-2 to 11-8: Flood Risk Assessment and Drainage Strategy [REP1-039, REP1-041, REP1-043, REP1-045, REP1-047, REP1-049 and REP1-051] identify the relevant flow directions, drainage features, watercourses and downstream receptors for each parcel. Localised effects have been assessed within the catchment and against the receptor to which they relate. Hydraulically separate catchments cannot meaningfully be combined within a single local hydraulic model. Where different parts of the Scheme ultimately drain towards a common wider receptor, the cumulative assessment considers whether the Scheme could materially alter the flows reaching that receptor. Panelled fields do not form connected impermeable catchments and formal impermeable areas will be separately attenuated and controlled.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Targeted modelling, open-channel calculations, mapped surface water information and parcel-specific drainage assessment therefore provide a more appropriate understanding of the relevant system behaviour than a single model combining separate catchments and different runoff mechanisms. • **There is limited demonstration of how SuDS principles apply across panel areas.** Formal SuDS are provided where the Scheme creates a defined impermeable catchment requiring collection, treatment, attenuation and controlled discharge. Panelled fields do not create that form of catchment because rainfall returns to the underlying ground rather than being collected through gutters or a positive drainage system. The relevant SuDS source and pathway principles are applied through maintenance of vegetation, protection and remediation of soil structure,

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				permeable access tracks, retention of existing flow routes, local cross-drainage and prevention of uncontrolled connection to downstream drainage features. Providing engineered attenuation across the panelled fields would first require runoff to be collected into a new drainage network, which could itself alter the existing natural drainage regime. • **The risk of erosion at drip lines is acknowledged but not quantified for the site, and ground condition and permeability assumptions are not validated under worst-case conditions.** The Applicant recognises that rainfall can be locally concentrated at panel edges. The potential for erosion depends on panel geometry, slope, soil condition, vegetation cover and connectivity to a downstream pathway. These variables differ across the Scheme and the final panel arrangement is not fixed. A single

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				quantified erosion rate would not provide reliable evidence of field-scale runoff or downstream flood risk. The research reviewed in the **Applicant's Response to Lead Local Flood Authority on Hydraulic Modelling Requirements [REP2-045]** identifies bare, compacted or poorly vegetated ground as the principal risk condition. The Scheme directly controls those conditions through soil protection, remediation of compaction and establishment and maintenance of vegetation beneath and between the panels. The Applicant has not assumed that soils are uniformly permeable or that runoff cannot occur under saturated or extreme rainfall conditions. Existing surface water mapping and the site-specific assessments already identify where rainfall may exceed infiltration and flow overland.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Actual soil condition will be inspected during construction and compaction, waterlogging or poor reinstatement will require remediation. Vegetation establishment and operational ground condition will then be monitored through the detailed LEMP and OEMP. Operational inspections will identify erosion, rilling, bare ground or preferential flow and require local remedial action. A compacted and unvegetated sensitivity case would represent an unmitigated condition rather than the Scheme as proposed. The DCO secures the measures necessary to prevent that condition from persisting and provides monitoring and corrective action where local deterioration occurs. • **Evidence does not fully demonstrate resilience under climate change scenarios.** The applicable climate change allowances have been

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				incorporated where relevant to the flood mechanism. Formal drainage systems will be designed to manage the 1 in 100 year rainfall event plus the applicable climate change allowance. Hydraulic modelling and open-channel assessments include the relevant future flow allowances. For the panelled areas, resilience is provided through maintenance of vegetation, soil structure, permeable access tracks and existing surface water pathways. Extreme surface water behaviour has been assessed through the available flood mapping and topographic evidence, with targeted hydraulic modelling undertaken where a defined watercourse interaction exists. • **Paragraph 7.2 and the overall conclusion concerning compliance with NPS EN-1.** The Applicant considers that the Scheme has been assessed to the

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				level of detail appropriate for the DCO stage. The Application establishes the baseline flood mechanisms, identifies the relevant receptors and pathways, assesses each Solar PV Site and the Cable Route Corridor, provides hydraulic modelling and quantitative analysis where the inputs and mechanisms can be reliably defined, and fixes the drainage and mitigation outcomes that the detailed design must achieve. The precise arrangement of permanent drainage components, final storage volumes, outfalls, flow controls, exceedance routes and maintenance access depends on the final layout, levels and impermeable areas. Those details are appropriately secured through Requirement 11 of the **Draft Development Consent Order [REP1-007]**, rather than being fixed against an indicative layout. Construction drainage is secured through Requirement 13,

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				landscape and vegetation management through Requirement 12, operational inspection and maintenance through Requirement 14, soil management through Requirement 18 and decommissioning and restoration through Requirement 20. The relevant detailed plans must be approved before the associated works commence and subsequently implemented. NPS EN-1 requires a proportionate assessment demonstrating that the Scheme will be safe and will not increase flood risk elsewhere. It does not prescribe blanket field-scale modelling of solar panel areas. The Applicant therefore considers that the submitted assessment, further targeted modelling at Lime Down E2 and the secured design and management controls provide the evidence required at this stage of the DCO process and demonstrate that the Scheme will not increase flood risk elsewhere.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
WC-114	Hydrology, Flood Risk and Drainage	SLD Comments on Submissions Received at Deadlines 1 and 1A	8. Stop Lime Down Comments on Submissions Received at Deadlines 1 and 1A [REP2-051] 8.1. The Stop Lime Down submission highlights that: • Limited changes to the FRA indicate unresolved drainage issues remain. • Lack of detailed SuDS design limits understanding of runoff and water quality management. • Firewater containment capacity remains uncertain under combined storm / fire scenarios. • Watercourse Crossing Schedule lacks sufficient mapping / detail for assessment. • Potential disruption to field drainage systems along cable route not fully addressed. 8.2. This raises uncertainty in demonstrating compliance with NPS EN-1 requirements to ensure no increase in flood risk. Further site-specific quantitative evidence, modelling (where proportionate), and clear secured design /	The Applicant has considered each matter identified from **Stop Lime Down Comments on Submissions Received at Deadlines 1 and 1A [REP2-051]**. These matters were also addressed directly in **Applicant's Response to Submissions Received at Deadline 2 [EXAM/9.30]**. The Applicant responds to each point below. • **Limited changes to the FRA indicate unresolved drainage issues remain.** The Applicant does not agree that the extent of changes made to the FRA indicates that drainage issues remain unresolved. The Deadline 1 revisions were targeted to the matters raised through consultation and the Examination. They included updates to **ES Volume 3, Appendix 11-1: Flood Risk Assessment and Drainage Strategy Covering Report [REP3-039]**, the site-specific **ES Volume 3, Appendices 11-2 to**

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			mitigation measures are required to provide confidence to the LLFA that flood risk will not be increased elsewhere.	**11-9: Flood Risk Assessment and Drainage Strategy [REP3-049, REP3-051, REP3-053, REP3-055, REP3-057, REP3-059, REP3-061 and REP3-063]**, and supporting documents addressing watercourse crossings, firewater containment, construction controls and the Water Framework Directive. The Applicant has subsequently provided further explanation and signposting through **Applicant's Response to Lead Local Flood Authority on Hydraulic Modelling Requirements [REP2-045]**, **Applicant's Response to Submissions Received at Deadline 2 [REP3-129]** and **Applicant's Response to the Examining Authority's First Written Questions [REP3-128]**. Further targeted hydraulic modelling is also being undertaken at Lime Down E2 in relation to Gabriel's Well. The absence of wholesale revision does not indicate that the

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				assessment is incomplete. No new evidence has been identified that requires the fundamental assessment approach or its conclusion to be changed. The submitted documents establish the relevant flood mechanisms, receptors, drainage principles and mitigation outcomes at the level appropriate for the DCO stage. • **Lack of detailed SuDS design limits understanding of runoff and water quality management.** The Scheme includes an Outline Drainage Strategy in Section 6 of **ES Volume 3, Appendix 11-1: Flood Risk Assessment and Drainage Strategy Covering Report [REP3-039]**, supported by the site-specific FRA and Drainage Strategy appendices. The drainage principles and required performance are defined. Formal impermeable infrastructure, including the BESS, substations and associated hardstanding, will be served by engineered drainage systems incorporating treatment,

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				attenuation, flow control, exceedance routing and isolation where required. Surface water drainage will be designed for the 1 in 100 year rainfall event plus the applicable climate change allowance. The relevant 1 year and 2 year post-development discharge rates will be restricted to 70% of the corresponding greenfield rates. The final combination of SuDS components, dimensions, levels, storage volumes, outfalls and maintenance access depends on the final equipment layout, impermeable area and platform levels. Fixing those details against an indicative layout would not provide a reliable final design. Requirement 11 of the **Draft Development Consent Order [REP3-005]** requires the detailed surface water drainage scheme for the relevant part of the Scheme to be submitted to and approved by the relevant planning authority before that part commences. The Requirement therefore secures the

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				final hydraulic calculations, SuDS design, treatment provision, exceedance arrangements and maintenance requirements. Panelled areas do not create positively drained impermeable catchments. Rainfall returns to the underlying ground and is managed through soil protection and remediation, permanent vegetation, permeable access tracks and retention of existing drainage pathways. The distinction between panelled land and formal infrastructure reflects the different runoff mechanisms and is consistent with the response in **Hydrology, Flood Risk and Drainage Response to LLFA Comment WC-053 Raised in Deadline 2 Submissions [EN010168/EXAM/9.47]**. . • **Firewater containment capacity remains uncertain under combined storm / fire scenarios.** The firewater containment principles are set out in **ES**

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Volume 3, Appendix 11-6: Flood Risk Assessment and Drainage Strategy - Lime Down D / BESS [REP3-057], **Firewater Containment and Drainage Strategy - Lime Down D Battery Energy Storage System [REP3-118]**, **Firewater Containment and Drainage Strategy - Lime Down Substation [REP3-120]** and **Outline Battery Safety Management Plan [REP3-106]**. The normal surface water drainage system and the emergency firewater containment system perform different functions. The normal drainage system will be designed for the 1 in 100 year rainfall event plus climate change. During a fire event, the relevant drainage catchment will be isolated using shut-off valves or equivalent measures so that potentially contaminated firewater and rainfall falling on the isolated catchment are retained for testing, treatment, tankering or controlled disposal.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				The credible containment design basis is a localised fire combined with a 1 in 10 year rainfall event. This reflects CIRIA C736, which uses accumulated rainfall on a 10% AEP basis for containment design. The Applicant has explained the basis for this approach and the distinction between lifetime drainage design and temporary emergency containment in its response to FHW1.7 within **Applicant's Response to the Examining Authority's First Written Questions [REP3-128]**. The BESS firewater supply basis includes a minimum of two on-site water storage units of no less than 228,000 litres each. The final containment calculation will use the final firefighting water requirement, containment catchment, drainage layout, levels and available storage. These details depend on the selected

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				BESS and substation equipment and final compound layout. The design principles are therefore fixed, while the final dimensional calculation is appropriately undertaken at detailed design. Requirement 11 of the **Draft Development Consent Order [REP3-005]** secures the final drainage and containment design. The BESS fire safety and emergency response arrangements are additionally secured through Requirement 6 and the detailed Battery Safety Management Plan. • **Watercourse Crossing Schedule lacks sufficient mapping / detail for assessment.** The Applicant does not agree that insufficient information has been provided to assess the proposed watercourse crossings. **ES Volume 3, Appendix 9-9: Watercourse Crossing Schedule [REP3-122]** identifies 35 watercourse crossings, comprising four Main River crossings and 31

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				ordinary watercourse crossings. For each crossing, Table 1 provides: • a unique crossing reference; • an easting and northing grid reference; • designation as a Main River or ordinary watercourse; • the preferred cable crossing method; • the proposed access arrangement, where relevant; • the relevant regulatory authority; • the part of the Scheme within which the crossing is located; • a description of the channel, banks, observed flow, substrate and vegetation; and • a site photograph, where available. An accompanying **Watercourse Crossing Figure [EXAM/9.38]** has also been submitted, showing the crossing references spatially in

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				relation to the Order Limits and Scheme layout. The Schedule should be read alongside **ES Volume 3, Appendix 11-9: Flood Risk Assessment and Drainage Strategy - Cable Route Corridor [REP3-063]**, **ES Volume 3, Appendix 3-2: Cable Route Construction Method Statement [REP3-042]** and **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP3-015]**. The proposed approach is also defined. HDD will be used at the Main River crossings, except at SM3 where an open-cut crossing may be undertaken at the existing ford. HDD launch and reception pits will be located at least 10 m from the watercourse. The Schedule identifies whether smaller ordinary watercourses are proposed to be crossed using HDD, open-cut methods, temporary culverts, retained existing culverts or new permanent culverts.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				The final crossing positions and detailed methods must respond to the final cable alignment, ground conditions, utilities, ecology and land drainage. Any refinement will be kept to the minimum reasonably practicable and remain within the assessed parameters. Detailed crossing methods, temporary flow management, pollution controls and reinstatement will be included in the detailed CEMP. Requirement 13 of the **Draft Development Consent Order [REP3-005]** requires the detailed CEMP to be prepared substantially in accordance with the **Outline Construction Environmental Management Plan [REP3-092]**, approved before the relevant construction stage commences and subsequently implemented. Any separate regulatory approval required for works affecting a watercourse must also be obtained.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				The Schedule, accompanying figure and supporting assessments therefore provide the information required to assess the crossings at the DCO stage while appropriately securing the final construction detail. • **Potential disruption to field drainage systems along the cable route is not fully addressed.** The interaction between the Cable Route Corridor and existing drainage systems is assessed in **ES Volume 3, Appendix 11-9: Flood Risk Assessment and Drainage Strategy - Cable Route Corridor [REP3-063]** and the construction approach is set out in **ES Volume 3, Appendix 3-2: Cable Route Construction Method Statement [REP3-042]**. The precise position, depth, condition and connectivity of private agricultural drains cannot be established comprehensively from available records. Pre-construction surveys will therefore

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				identify field drains and other drainage features that may be affected by the final cable alignment. Where an existing drain is encountered, it will be recorded and protected, temporarily diverted, repaired or reinstated so that its hydraulic function is maintained. Cable trenches will be backfilled and the surface reinstated to the existing profile. Topsoil and subsoil will be stripped, stored and replaced separately in accordance with the **Outline Soil Resources Management Plan [REP3-098]**. Temporary drainage will also be provided where required to prevent the trench or working area from creating an uncontrolled preferential flow pathway or discharging sediment-laden runoff to an existing drain or watercourse. The final field drainage interfaces and temporary drainage measures will be set out in the Water Management Plan forming part of

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				the detailed CEMP. These arrangements are secured through Requirement 13 of the **Draft Development Consent Order [REP3-005]**. Soil handling and reinstatement are additionally secured through Requirement 18. The remaining detail depends on the final cable alignment and the drainage features confirmed through pre-construction surveys. Deferring that location-specific detail does not leave the effect unassessed. The DCO secures the outcome that existing drainage function must be maintained or reinstated. • **Paragraph 8.2: Further site-specific evidence, modelling and secured measures are required to demonstrate compliance with NPS EN-1.** The Applicant does not agree that the matters listed at paragraph 8.1 establish uncertainty regarding compliance with NPS EN-1. The Application provides site-specific flood risk and drainage

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				assessments for each Solar PV Site and the Cable Route Corridor, targeted hydraulic modelling, proportionate assessment of ordinary watercourses, quantitative drainage assessment for formal impermeable infrastructure and defined controls for SuDS, firewater containment, watercourse crossings, field drainage, construction runoff and pollution prevention. The Applicant's detailed position on proportionality, panelled-area runoff and hydraulic modelling is provided in **Hydrology, Flood Risk and Drainage Response to LLFA Comment WC-053 Raised in Deadline 2 Submissions [EN010168/EXAM/9.47]**, at WC-054, and in **Applicant's Response to Lead Local Flood Authority on Hydraulic Modelling Requirements [REP2-045]**. The assessment establishes the flood mechanisms, receptors, pathways, drainage outcomes and

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				mitigation required at the DCO stage. The remaining detailed drainage dimensions and construction arrangements depend on the final layout and methodology and are secured through enforceable DCO Requirements rather than fixed against an indicative design. Permanent drainage is secured through Requirement 11, construction water management through Requirement 13, operational management through Requirement 14, soil management through Requirement 18 and decommissioning and restoration through Requirement 20 of the **Draft Development Consent Order [REP3-005]**. BESS safety and emergency arrangements are additionally secured through Requirement 6. The Applicant therefore considers that the submitted assessment, further targeted work and secured design and management controls provide the evidence and certainty

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				required at this stage of the DCO process and demonstrate that the Scheme will not increase flood risk elsewhere.

3 The Applicant's Response to Statutory Consultees, Undertakers and Notable Parties with Whom the Applicant Is Seeking to Undertake a Statement of Common Ground

3.1 National Grid Electricity Transmission PLC

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
NGET-001	Scheme Description and DCO Process	INTRODUCTION	INTRODUCTION 1.1 In its Written Representation [AS-013], NGET confirmed that it would provide a further update on the issues raised in those submissions and a set of requested protective provisions if these are not yet agreed at Deadline 3.	The Applicant notes this comment. The Applicant has provided a response in respect of protective provisions below at NGET-002.
NGET-002	Scheme Description and DCO Process	UPDATE ON PROTECTIVE PROVISIONS	UPDATE ON PROTECTIVE PROVISIONS 2.1. The Applicant has now provided a set of draft protective provisions for NGET to review but these have not been provided in time to provide a more full update at Deadline 3.	The Applicant confirms that it provided a draft Side Agreement and form of protective provisions to NGET's solicitors on 12 June 2026 and is awaiting comments.

			2.2. As discussions on the protective provisions are at an early stage, NGET proposes to provide a further update to the Examining Authority by Deadline 5. If protective provisions are not agreed by Deadline 5 NGET will provide a version of protective provisions it requires to be included in the Order.	

3.2 National Highways

Reference	Theme	Issue	Comments/ Issue Raised	Applicant's Response to Written Representation	NH Response	Applicant's Response
NH-001	Consultation and Engagement	Introduction	1. Introduction 1.1. This Written Representation is made on behalf of National Highways ("NH") in respect of an application by Lime Down Solar Ltd ("Applicant") for an order granting development consent for the Lime Down Solar Project ("DCO"). The Applicant seeks development	The Applicant confirms that there is ongoing negotiations with National Highways. A draft Statement of Common Ground **[EN010168/EXAM/8.8]** has been prepared and shared with National Highways based on Relevant Representation, ahead of submission at Deadline 2. An update on the progress and current position of	The Statement of Common Ground remains under discussion.	The Applicant has noted this comment.

Reference	Theme	Issue	Comments/ Issue Raised	Applicant's Response to Written Representation	NH Response	Applicant's Response
			consent for proposed authorised development described in Schedule 1 of the draft DCO ("Authorised Development"). 1.2. NH and the Applicant are engaged in ongoing negotiations and continue to work constructively together with a view to resolving and/or narrowing the outstanding issues between them as far as	the Statement of Common Ground with the National Highways is provided in the **Statement of Commonality [REP1A-010]**.		

Reference	Theme	Issue	Comments/ Issue Raised	Applicant's Response to Written Representation	NH Response	Applicant's Response
			possible. To the extent that any issues remain unr esolved at this stage, NH does not seek to rehearse those matters in this Written Representation but instead continues to rely on the positions advanced in its Relevant Representation [RR-3426], which are maintained in full. This Written Representation supplements and updates NH's Relevant			

Reference	Theme	Issue	Comments/ Issue Raised	Applicant's Response to Written Representation	NH Response	Applicant's Response
			Representation in light of the Applicant's comments thereon [PDA - 009].			
NH-002	Transport and Access	Protective Provisions	Protective Provisions — Overarching Position 2.1. The Protective Provisions on the face of the order are not yet agreed, and an updated draft of the Protective Provisions is awaited. NH has provided a full set	The Applicant notes this comment and confirms that updated Protected Provisions for the protection of National Highways have been agreed and are included at Part 5 of Schedule 15 (Protective Provisions) to the revised **Draft Development**	The Protective Provisions on the are not yet agreed. Discussions are on going.	National Highways' solicitors confirmed agreement in principle with the draft Side Agreement and form of protective provisions provided on 17 April 2025 subject to further discussion between the parties on a select number of outstanding points. Negotiations in respect of these points remain ongoing.

Reference	Theme	Issue	Comments/ Issue Raised	Applicant's Response to Written Representation	NH Response	Applicant's Response
			of proposed protective provisions at Appendix 1 to its Relevant Representation and has set out detailed justifications for each provision (paragraphs 1 through to 21 of the proposed protective provisions). The Applicant's response to NH's Relevant Representations i ndicates that it is "progressing discussions" on the Protective	**Consent Order [REP1-007]** submitted at Deadline 1. The Applicant welcomes ongoing engagement with National Highways.		

Reference	Theme	Issue	Comments/ Issue Raised	Applicant's Response to Written Representation	NH Response	Applicant's Response
			Provisions and that draft Protective Provisions are already included in the DCO (Part 5 of Schedule 15). In response, and whilst discussions are progressing, NH maintains the draft Protective Provisions included in the Order are not agreed and that its own proposed Protective Provisions (at Appendix 1 of NH's Relevant Representation [RR- 3426])			

Reference	Theme	Issue	Comments/ Issue Raised	Applicant's Response to Written Representation	NH Response	Applicant's Response
			should be adopted.			
NH-003	Transport and Access	Land and Book of Reference Issues	3. Land and Book of Reference Issues Technical Works (Works Nos. 5a and HDD under M4) and plots 09-018, 09-019, 09-020 and to 09-021) (subsoil to the M4) 3.1. In relation to the cable route crossing beneath the M4 via Horizontal Directional Drilling (HDD), the Applicant has confirmed the M4	The Applicant notes this comment and confirms that the M4 crossing is proposed as a fully trenchless HDD installation at a minimum depth to cover of 11.6 metres below the M4 carriageway. The Applicant also confirms that discussions are underway with National Highways about	Discussions in relation to the geotechnical specification for directional drilling remain ongoing.	The Applicant confirms that comments and documentation for the CD622 M4 HDD crossing have been accepted by National Highways, and the Applicant is currently on finalising the submission pack for formal acceptance.

Reference	Theme	Issue	Comments/ Issue Raised	Applicant's Response to Written Representation	NH Response	Applicant's Response
			crossing is proposed as a fully trenchless HDD installation at a minimum depth to cover of 11.6 metres below the M4 carriageway and refers to NH to ES Volume 1: Chapter 3 [APP-055]. Work No 5a affects plots 09-018, 09-019, 09-020 and 09-021) (subsoil to the M4). 3.2. Discussions with National Highways technical teams	the geotechnical specification for directional drilling and that any proposed directional drilling under NH's network will require compliance with The Design Manual for Roads and Bridges ("DMRB") Chapter CD622 (Managing Geotechnical Risk).		

Reference	Theme	Issue	Comments/ Issue Raised	Applicant's Response to Written Representation	NH Response	Applicant's Response
			about the geotechnical specification for directional drilling are still underway. Any proposed directional drilling under NH's network will require compliance with The Design Manual for Roads and Bridges ("DMRB") Chapter CD622 (Managing Geotechnical Risk).			
NH-004	Transport and Access	Land and Book of Reference Issues	Detrunked Roads (Plots 13-005 to 13-016, 20-001 to 20-003)	The Applicant acknowledges the explanation of National Highways	The Applicant's response in relation to the De Trunked plots and the Side Road Order plots appears to	The Applicant acknowledges National Highways explanation regarding the difference between

Reference	Theme	Issue	Comments/ Issue Raised	Applicant's Response to Written Representation	NH Response	Applicant's Response
			3.3. There are a significant number of plots where NH originally noted that the roads had been detrunked a nd transferred to the Local Highway Authority (LHA). The Applicant has confirmed it will update the Book of Reference to remove NH's listed interests.	interests in relation to the Side Road Order for the M4 Scheme affecting plots 13-005 to 13-016, and 20-001 to 20-003. The Applicant can confirm National Highways have been removed as the highway authority over these plots but retained as the subsoil owner due to HM Land Registry titles GR324123 and WT274108, at last edition, still being registered	be mixed up with the comments for the Detrunked Plots (NH-004) referring to the Side Road Order and NH's subsoil rights and the Side Road Order plots (NH-005) not referring to NH's rights in the subsoil. However, plots 13-005 to 13-016, and 20-001 to 20-003 have been detrunked and NH no longer have an interest. To clarify, in relation to the De Trunked plots NH have no interest. In relation to the Side Road Order plots, confirmation is	the plots, and confirms that in the next Book of Reference provided during examination, t he interests related to National Highways will be removed from the plots identified as being detrunked. The plots identified as affected by the side road order, the Applicant can confirm that works are within the operational highway only, and as such, the National Highway interests will be removed from the subsoil as requested.

Reference	Theme	Issue	Comments/ Issue Raised	Applicant's Response to Written Representation	NH Response	Applicant's Response
				to National Highways.	required as to the depth of the works for these plots. If works are in the subsoil then an easement is required from NH.	
NH-005	Transport and Access	Land and Book of Reference Issues	Side Roads Order Plots (Plots 21-004 to 21-007) 3.4. For plots forming part of a Side Roads Order for the M4 scheme, NH confirms that the LHA is responsible, not NH, given the Side Road Order. Accordingly, for these plots, provided works	The Applicant acknowledges the explanation of National Highways interests in relation to the Side Road Order for the M4 Scheme affecting plots 21-004 to 21-007, and will update the plots accordingly at the Deadline 3 to show the local highways	Please see response to NH-004 above.	Response as above in NH-004

Reference	Theme	Issue	Comments/ Issue Raised	Applicant's Response to Written Representation	NH Response	Applicant's Response
			are not in subsoil, NH have no interest. If works are in the subsoil then agreement is required from NH. The Applicant is requested to provide NH details confirming the depth of the works.	authority as the interest holder		
NH-006	Hydrology, Flood Risk and Drainage	Land and Book of Reference Issues	Outstanding Information Requests 3.5. Several plots are included in the Book of Reference as a consequence of drainage and	The Applicant during diligent inquiry research, has identified drainage and gully apparatus related to the road network in plots 09-018, 09-020, 09-021, which as	NH is considering the information supplied and will revert. NH would welcome receipt of the shapefile as suggested.	The Applicant will provide National Highways with a shapefile to aid consideration.

Reference	Theme	Issue	Comments/ Issue Raised	Applicant's Response to Written Representation	NH Response	Applicant's Response
			gully apparatus, easements, and conveyances. In relation to these plots, NH's position is that the additional information requested is still required. NH asked the Applicant for copies of the following to evaluate how the scheme affects its interest: • Plot 13-003 (Conveyance dated 14	the highway authority, have been defined as a National Highways interest. These interests are not contained on HM Land Registry titles related to the land, these are interests that relate to physical apparatus identified during research, and as such no supporting document rights documents can be provided. The Applicant can provide a shapefile of		

Reference	Theme	Issue	Comments/ Issue Raised	Applicant's Response to Written Representation	NH Response	Applicant's Response
			February 1958) • Plot 09-018 (Drainage and gully apparatus) (easement/ private right) Plot 09-020 (Drainage and gully apparatus) (easement/ private right) • Plot 09-021 (Drainage and gully apparatus) (easement	known National highways apparatus. The Applicant has identified National Highways as the successor of a Conveyance dated 14 February 1958 listed on title NT435341. The Applicant is unable to provide the Conveyance document as it is unavailable for purchase at HM Land Registry, potentially due to documents not being shared with HM Land Registry upon registration,		

Reference	Theme	Issue	Comments/ Issue Raised	Applicant's Response to Written Representation	NH Response	Applicant's Response
			or private right) • Plot 13-003 (Conveyance dated 14 February 1958 — Part 3 interest)	or the original document has been lost. The title register can be provided to National highways to provide some further details of conveyance that is shown on register.		
NH-007	Transport and Access	Protective Provisions	4. Draft DCO Articles 4.1. NH's extensive concerns regarding individual DCO articles (Articles 8, 10, 11, 12, 16, 17, 19,	The Applicant notes this comment and confirms that updated Protected Provisions for the protection of National Highways have been agreed and are included at	The Protective Provisions on the are not yet agreed. Discussions are on going.	The Applicant refers National Highways to its response given to NH-002.

Reference	Theme	Issue	Comments/ Issue Raised	Applicant's Response to Written Representation	NH Response	Applicant's Response
			20, 21, 24, 25, 27, 29, 30, 31, 32, 33, 34, 38, 40, 41, 42, and 47) as set out in its Relevant Representations [RR-3426] remain outstanding. NH's concerns are re-iterated in summary below. The Applicant's response to NH's Relevant Representations [PDA -009] consistently refers to ongoing discussions on the Protective Provisions. Whilst this is the position, the	Part 5 of Schedule 15 (Protective Provisions) to the revised **Draft Development Consent Order [REP1-007]** submitted at Deadline 1. The Applicant welcomes ongoing engagement with National Highways.		

Reference	Theme	Issue	Comments/ Issue Raised	Applicant's Response to Written Representation	NH Response	Applicant's Response
			Protective Provisions on the face of the order are not yet agreed and an updated draft of Protective Provisions is awaited.			
NH-008	Transport and Access	Street Works	Article 8 – Street Works: NH has received no information regarding the nature and scope of proposed works beneath the M4 at points 9i and 9j on the Streets Plan. NH seeks confirmation that any apparatus installed under the SRN will be	As set out within **ES Volume 1, Chapter 3: The Scheme [APP-055]** and **ES Volume 3, Appendix 3-2: Cable Route Construction Method Statement [APP-183]**, a number of Avoidance Areas have been identified,	Discussions in relation to the geotechnical specification for directional drilling remain ongoing/ The Protective Provisions on the are not yet agreed. Discussions are on going.	The Applicant refers National Highways to its response given to NH-002 in respect of the position in relation to protective provisions.

Reference	Theme	Issue	Comments/ Issue Raised	Applicant's Response to Written Representation	NH Response	Applicant's Response
			carried out by HDD rather than open cut method, and the programme for the cable works has not been provided. The Applicant must obtain NH's prior approval for any works undertaken in connection with the SRN. Such consent should not be subject to deemed consent under article 47.	including at the M4 and Great Western Railway, where non-intrusive installation methods will be used to avoid direct impacts (refer to **ES Volume 2, Figure 3-2 Key Construction Phase Features [APP-082]**). The Cable Route corridor crossing of the M4 is proposed as a fully trenchless HDD installation, with launch and reception		

Reference	Theme	Issue	Comments/ Issue Raised	Applicant's Response to Written Representation	NH Response	Applicant's Response
				pits located South and North of the carriageway. The motorway runs east-west through the site with the HDD crossing passing beneath both the eastbound and westbound carriageways. The HDD will be located at a minimum depth to cover of 11.6m below the M4 carriageway. No excavation, pavement breaking, or physical works are required withi		

Reference	Theme	Issue	Comments/ Issue Raised	Applicant's Response to Written Representation	NH Response	Applicant's Response
				n the M4 carriageway. Surface monitoring will be undertaken using reflector-less total stations positioned off carriageway, meaning no lane access is required. The Applicant confirms that updated Protected Provisions for the protection of National Highways have been agreed and are included at		

Reference	Theme	Issue	Comments/ Issue Raised	Applicant's Response to Written Representation	NH Response	Applicant's Response
				Part 5 of Schedule 15 (Protective Provisions) to the revised **Draft Development Consent Order [REP1-007]** submitted at Deadline 1.		
NH-009	Transport and Access	Power to Alter Layout	Article 10 – Power to Alter Layout etc. of Streets: NH has no interest in the streets specified in Schedule 5. However, subsection (2) contains non-street-specific powers that may	The Applicant notes this comment and confirms that updated Protected Provisions for the protection of National Highways have been agreed and are included at Part 5 of	The Protective Provisions on the are not yet agreed. Discussions are on going.	The Applicant refers National Highways to its response given to NH-002.

Reference	Theme	Issue	Comments/ Issue Raised	Applicant's Response to Written Representation	NH Response	Applicant's Response
			affect NH's interests. Consent under article 10(4) should not be subject to deemed consent under article 47. The Applicant must obtain NH's prior approval for any works undertaken in connection with the SRN.	Schedule 15 (Protective Provisions) to the revised **Draft Development Consent Order [REP1-007]** submitted at Deadline 1.		
NH-010	Transport and Access	Construction and Maintenance of Altered Streets	Article 11 – Construction and Maintenance of Altered Streets: NH objects to the deemed adoption mechanism under this article. Article 11 should	The Applicant notes this comment and refers National Highways to the response given to NH-009.	The Protective Provisions on the are not yet agreed. Discussions are on going.	The Applicant refers National Highways to its response given to NH-002.

Reference	Theme	Issue	Comments/ Issue Raised	Applicant's Response to Written Representation	NH Response	Applicant's Response
			expressly exclude the SRN. NH does not agree that works on its network should be subject to deemed adopti on provisions. The Applicant must obtain NH's prior approval for any works undertaken in connection with the SRN.	The Applicant does however welcome ongoing engagement with National Highways.		
NH-011	Transport and Access Socio-Economics, Recreation and Tourism	Public Rights of Way	Article 12 – Temporary Closure, Restriction or Prohibition of Use of Streets and Public Rights of Way: NH has no interest in the	The Applicant notes this comment and refers National Highways to the response given to NH-009.	The Protective Provisions on the are not yet agreed. Discussions are on going.	The Applicant refers National Highways to its response given to NH-002.

Reference	Theme	Issue	Comments/ Issue Raised	Applicant's Response to Written Representation	NH Response	Applicant's Response
			streets or public rights of way listed in Schedule 6. However, subsection (1) contains a general power that may affect NH's interests. NH is concerned that the article only requires the Applicant to consult NH, not obtain its consent. Applicant should be required to obtain NH's consent in the event the activities affect the SRN or any	The Applicant does however welcome ongoing engagement with National Highways.		

Reference	Theme	Issue	Comments/ Issue Raised	Applicant's Response to Written Representation	NH Response	Applicant's Response
			land in which NH has an interest.			
NH-012	Transport and Access	Traffic Regulation	Article 16 – Traffic Regulation Measures: NH has no interest in the roads specified in Schedule 8, but subsection (1) contains a wider power which may affect NH's interests. NH requires that consent from the traffic authority should not be subject to deemed consent under article 47. The draft order also allows	The Applicant notes this comment and refers National Highways to the response given to NH-009. The Applicant does however welcome ongoing engagement with National Highways.	The Protective Provisions on the are not yet agreed. Discussions are on going.	The Applicant refers National Highways to its response given to NH-002.

Reference	Theme	Issue	Comments/ Issue Raised	Applicant's Response to Written Representation	NH Response	Applicant's Response
			the Applicant to exercise powers under article 16(1) with deemed approval under section 65 of the Road Traffic Regulation Act 1984, which NH opposes — NH must have control over the placing of signage on its network. All signage must be designed in accordance with the Traffic Signs Manual Chapter 8 and the DMRB, and NH seeks clarity on why the Applicant			

Reference	Theme	Issue	Comments/ Issue Raised	Applicant's Response to Written Representation	NH Response	Applicant's Response
			seeks wording deeming compliance with the Traffic Signs Regulations and General Directions 2016. The Applicant must obtain NH's prior approval for any works undertaken in connection with the SRN. Such consent should not be subject to deemed consent under article 47.			
NH-013	Transport and Access Hydrology,	Discharge of Water	Article 17 – Discharge of Water: NH's drainage system	The Applicant notes this comment and refers National	The Protective Provisions on the are not yet agreed.	The Applicant refers National Highways to its response given to NH-002.

Reference	Theme	Issue	Comments/ Issue Raised	Applicant's Response to Written Representation	NH Response	Applicant's Response
	Flood Risk and Drainage		is not a public drain, and it is unclear whether the article is intended to apply to NH's drainage infrastructure. NH requires the Applicant to confirm the scope of this article in relation to NH's drains. Although the article requires consent from the owner of the watercourse, drai n or sewer, that consent is subject to deemed conse nt under article 47, which National	Highways to the response given to NH-009. The Applicant does however welcome ongoing engagement with National Highways.	Discussions are on going.	

Reference	Theme	Issue	Comments/ Issue Raised	Applicant's Response to Written Representation	NH Response	Applicant's Response
			Highways considers inappropriate in respect of its drainage infrastructure. In addition, if the article is intended to apply to NH's drainage infrastructure this would conflict with government policy. Paragraph 59 of DfT Circular 01/2022 (with which National Highways must comply) provides that no new connections into the highway drainage system			

Reference	Theme	Issue	Comments/ Issue Raised	Applicant's Response to Written Representation	NH Response	Applicant's Response
			from third party development will be accepted. Existing connections may continue only where flow, rate and quality of discharge remain unaltered or are bettered, and may be subject to a drainage management and maintenance agreement in perpetuity. National Highways' objection would be addressed by incorporating paragraph 7(2) of			

Reference	Theme	Issue	Comments/ Issue Raised	Applicant's Response to Written Representation	NH Response	Applicant's Response
			its proposed protective provisions (Appendix 1), which requires the Applicant to obtain National Highways' consent before exercising the right under this article.			
NH-014	Transport and Access	Protective Works to Buildings	Article 19 – Protective Works to Buildings: NH does not have any buildings within the order limits. However, sub-paragraph (4) provides the Applicant with the power to enter	The Applicant notes this comment and refers National Highways to the response given to NH-009. The Applicant does however	The Protective Provisions on the are not yet agreed. Discussions are on going.	The Applicant refers National Highways to its response given to NH-002.

Reference	Theme	Issue	Comments/ Issue Raised	Applicant's Response to Written Representation	NH Response	Applicant's Response
			land adjacent to a building to carry out protective works, and such adjacent land may form part of the SRN or land in which NH has an interest. The Applicant is requested to clarify whether Article 19(5) includes obtaining the consent of an owner of adjacent building. NH requires that the Applicant obtain NH's consent before exercising any access or works under this	welcome ongoing engagement with National Highways.		

Reference	Theme	Issue	Comments/ Issue Raised	Applicant's Response to Written Representation	NH Response	Applicant's Response
			article affecting the SRN. Such consent should not be subject to deemed conse nt under article 47.			
NH-015	Transport and Access	Authority to Survey and Investigate Land	Article 20 – Authority to Survey and Investigate Land: Whilst consent is required from the highway authority for trial holes, boreholes and trenches within the highway boundary, consent is not required for the wider use of the powers (e.g., access to land for	The Applicant notes this comment and refers National Highways to the response given to NH-009. The Applicant does however welcome ongoing engagement with National Highways.	The Protective Provisions on the are not yet agreed. Discussions are on going.	The Applicant refers National Highways to its response given to NH-002.

Reference	Theme	Issue	Comments/ Issue Raised	Applicant's Response to Written Representation	NH Response	Applicant's Response
			surveys). Consent is also not required for any land NH owns outside the highway boundary, and the right extends beyond the order limits. The Applicant should be required to obtain NH's consent in the event any access or works under this article affect the SRN or any land in which NH has an interest. Such consent should not be subject			

Reference	Theme	Issue	Comments/ Issue Raised	Applicant's Response to Written Representation	NH Response	Applicant's Response
			to deemed consent under article 47.			
NH-016	Transport and Access	Compulsory Acquisition	Article 21 – Compulsory Acquisition of Land: This article enables the Applicant to compulsorily acquire so much of the Order land as is required for the authorised development. If any part of the SRN is included, NH must have control over operations on its network. The Applicant should be	The Applicant notes this comment and refers National Highways to the response given to NH-009. The Applicant does however welcome ongoing engagement with National Highways.	The Protective Provisions on the are not yet agreed. Discussions are on going.	The Applicant refers National Highways to its response given to NH-002.

Reference	Theme	Issue	Comments/ Issue Raised	Applicant's Response to Written Representation	NH Response	Applicant's Response
			required to obtain NH's consent in the event any access or works under this article affect the SRN or any land in which NH has an interest.			
NH-017	Transport and Access	Compulsory Acquisition	Article 24 – Compulsory Acquisition of Rights/Article 25 – Private Rights: NH object to the power to compulsory acquire rights/private rights without its consent. NH must have control over operations on its network for safety	The Applicant notes this comment and refers National Highways to the response given to NH-009. The Applicant does however welcome ongoing engagement	The Protective Provisions on the are not yet agreed. Discussions are on going.	The Applicant refers National Highways to its response given to NH-002.

Reference	Theme	Issue	Comments/ Issue Raised	Applicant's Response to Written Representation	NH Response	Applicant's Response
			purposes. The Applicant should be required to obtain NH's consent in the event any access or works under this article affect the SRN or any land in which NH has an interest.	with National Highways.		
NH-018	Transport and Access	Power to Override Easements and Other Rights	Article 27 – Power to Override Easements and Other Rights: NH is unclear whether the effect of this article would be a temporary interference with or a permanent extinguishment of	The Applicant notes this comment and refers National Highways to the response given to NH-009. The Applicant does however	The Protective Provisions on the are not yet agreed. Discussions are on going.	The Applicant refers National Highways to its response given to NH-002.

Reference	Theme	Issue	Comments/ Issue Raised	Applicant's Response to Written Representation	NH Response	Applicant's Response
			NH's existing interests. The Applicant should confirm how this article is intended to operate in relation to NH's rights. The Applicant should be required to obtain NH's consent in the event any access or works under this article affect the SRN or any land in which NH has an interest.	welcome ongoing engagement with National Highways.		
NH-019	Transport and Access	Rights Under or Over Streets	Article 30 – Rights Under or Over Streets: NH would not permit uncontr	The Applicant notes this comment and refers National	The Protective Provisions on the are not yet agreed.	The Applicant refers National Highways to its response given to NH-002.

Reference	Theme	Issue	Comments/ Issue Raised	Applicant's Response to Written Representation	NH Response	Applicant's Response
			olled oversailing or works underneath its network, which would ordinarily have the protection of a section 50 notice under the New Roads and Street Works Act 1991. NH requires an approval role and control over both the subsoil vested in it and airspace over the SRN. The Applicant must obtain NH's prior approval for any works undertaken in	Highways to the response given to NH-009. The Applicant does however welcome ongoing engagement with National Highways.	Discussions are on going.	

Reference	Theme	Issue	Comments/ Issue Raised	Applicant's Response to Written Representation	NH Response	Applicant's Response
			connection with the SRN.			
NH-020	Transport and Access	Temporary Use of Land for Constructing the Authorised Development	Article 31 – Temporary Use of Land for Constructing the Authorised Development: Schedule 11 does not include land in which NH has an operational interest, but the article also applies to other Order land. The Applicant should be required to obtain NH's consent before taking temporary possession of any	The Applicant notes this comment and refers National Highways to the response given to NH-009. The Applicant does however welcome ongoing engagement with National Highways.	The Protective Provisions on the are not yet agreed. Discussions are on going.	The Applicant refers National Highways to its response given to NH-002.

Reference	Theme	Issue	Comments/ Issue Raised	Applicant's Response to Written Representation	NH Response	Applicant's Response
			land affecting the SRN or land in which NH has an interest.			
NH-021	Transport and Access	Temporary Use of Land for Constructing the Authorised Development	Article 32 – Temporary Use of Land for Maintaining the Authorised Development: This article grants the Applicant the right to take temporary possession of any land within the order limits without NH's consent during the maintenance period (five years from final commissioning).	The Applicant notes this comment and refers National Highways to the response given to NH-009. The Applicant does however welcome ongoing engagement with National Highways.	The Protective Provisions on the are not yet agreed. Discussions are on going.	The Applicant refers National Highways to its response given to NH-002.

Reference	Theme	Issue	Comments/ Issue Raised	Applicant's Response to Written Representation	NH Response	Applicant's Response
			NH must have control over operations on its network. The Applicant must obtain NH's consent in the event the activities affect the SRN.			
NH-022	Transport and Access	Statutory Undertakers	Article 33 – Statutory Undertakers: NH maintains that the Applicant should be required to obtain NH's consent in the event the activities affect the SRN or any	The Applicant notes this comment and refers National Highways to the response given to NH-009. The Applicant does however welcome ongoing engagement	The Protective Provisions on the are not yet agreed. Discussions are on going.	The Applicant refers National Highways to its response given to NH-002.

Reference	Theme	Issue	Comments/ Issue Raised	Applicant's Response to Written Representation	NH Response	Applicant's Response
			land in which NH has an interest.	with National Highways.		
NH-023	Transport and Access	Apparatus and Rights of Statutory Undertakers in Closed or Restricted Streets	Article 34 – Apparatus and Rights of Statutory Undertakers in Closed or Restricted Streets: This article cross-refers to articles 8, 10, 11 and 12. NH's requires further information to assess the impact of the scheme on its interests in relation to those articles. The Applicant should obtain NH's	The Applicant notes this comment and refers National Highways to the response given to NH-009. The Applicant does however welcome ongoing engagement with National Highways.	The Protective Provisions on the are not yet agreed. Discussions are on going.	The Applicant refers National Highways to its response given to NH-002.

Reference	Theme	Issue	Comments/ Issue Raised	Applicant's Response to Written Representation	NH Response	Applicant's Response
			consent before exercising any powers that affect the SRN.			
NH-024	Transport and Access	Application of Landlord and Tenant Law	Article 38 – Application of Landlord and Tenant Law: NH does not have sufficient information to assess whether this article is likely to affect its interests and has asked the Applicant to clarify the position	Article 38 is included in order to override landlord and tenant law so far as it would prejudice the operation of any agreement for leasing the whole of the Authorised Development or the right to operate the same or any agreement entered into by the undertaker for the construction, maintenance, use	The Protective Provisions on the are not yet agreed. Discussions are on going. In any event, the Applicant should be required to obtain NH consent in the event the activities affect the SRN or any land National Highways has an interest in. As a public body, NH is under a duty to act reasonably in providing such consent and this is expressly provided in	The Applicant refers National Highways to its response given to NH-002. The Applicant notes National Highways' comments in respect of the SRN and refers National Highways to the following paragraphs of the protective provisions included at Part 5 of Schedule 15 (Protective Provisions) to the revised **Draft DCO [REP3-005]:** Paragraph 2(3) provides that no works under the Order may be carried out in, under or over the SRN without the

Reference	Theme	Issue	Comments/ Issue Raised	Applicant's Response to Written Representation	NH Response	Applicant's Response
				or operation of the Authorised Development. This provision is required to ensure that landlord and tenant law does not impede the construction, use or maintenance of the Authorised Development. The is a model provision and has been included within numerous made solar DCOs including The Fenwick Solar Farm Order 2026,	NH's proposed protective provisions.	written consent of National Highways. Paragraph 4(3)(d) requires National Highways' consent before the exercise of a wide range of Order powers (Articles 5, 8, 10, 12, 14, 16, 17, 19, 20, 21, 24, 27, 29, 30, 31, 32 and 40) over any part of the SRN or land in which National Highways has an interest. Paragraph 4(5)(a)–(c) provides that any approval must not be unreasonably withheld, must be given in writing, and is deemed refused after 2 months — which reflects National Highways' st ated duty to act reasonably.

Reference	Theme	Issue	Comments/ Issue Raised	Applicant's Response to Written Representation	NH Response	Applicant's Response
				The Tillbridge Solar Order 2025, The East Yorkshire Solar Farm Order 2025, The West Burton Solar Project Order 2025 and The Cottam Solar Project Order 2024. The Applicant also confirms that updated Protected Provisions for the protection of National Highways have been agreed and are included at Part 5 of		Paragraph 18(3) further restricts the exercise of Order powers over National Highways' land or the SRN to obtaining NH consent (not to be unreasonably withheld or delayed).

Reference	Theme	Issue	Comments/ Issue Raised	Applicant's Response to Written Representation	NH Response	Applicant's Response
				Schedule 15 (Protective Provisions) to the revised **Draft Development Consent Order [REP1-007]** submitted at Deadline 1.		
NH-025	Transport and Access Arboriculture	Felling or Lopping of Trees and Removal of Hedgerows	Article 40 – Felling or Lopping of Trees and Removal of Hedgerows: NH has environmental mitigation commitments that may be affected by this article and which may put NH in breach of its own statutory obligations.	The Applicant refers to the response provided to National Highways Relevant Representation comments on this matter. Hedgerows CRH170 and CRH173 both lie within an	NH notes these comments, once discussions involved the geotech specifications of the drilling proposals have been resolved we will be better placed to comment on the likely impact on these hedgerows.	The Applicant notes the response provided by National Highways and concurs that following formal certification of CD622, discussions will continue to confirm final alignment and impacts on hedgerows.

Reference	Theme	Issue	Comments/ Issue Raised	Applicant's Response to Written Representation	NH Response	Applicant's Response
			Hedgerows CRH170, CRH173 and CRH172 are located on or near the boundary of the network. NH requires further clarity on the works within Works No. 5a that may impact these hedgerows so it can assess the cumulative impact. If works affect NH's BNG commitments, replacement trees must be provided at a location to be agreed. NH notes the Applicant's	'Avoidance Area' which are described in **ES Volume 2, Appendix 3-2: Cable Installation Method Statement [APP-183]** and are where trenchless technologies (such as Horizontal Directional Drilling (HDD) will be employed for cable installation works. As such CRH170 and CRH172 will not be impacted by the Scheme. Up		

Reference	Theme	Issue	Comments/ Issue Raised	Applicant's Response to Written Representation	NH Response	Applicant's Response
			response to NH's Written Representations which relate to this Article. NH is unable to locate the information referred to (ES Volume 2 Appendix 3-2 Cable Installation Method [APP-183] and the Ecological Protection and Mitigation Strategy [APP-284]) and therefore is unable to comment further at the moment. Please	to a 12 m wide section of CRH172 may be removed temporarily for cable route installation works, to enable construction of a cable trench and temporary haul route as described in Section 2.4 of the **Outline Ecological Protection and Mitigation Strategy [REP1-106]**. On completion of temporary construction		

Reference	Theme	Issue	Comments/ Issue Raised	Applicant's Response to Written Representation	NH Response	Applicant's Response
			also see NH's comments in relation to Requirement 7 and 8.	works, any section of hedgerow removed at CRH173 will be reinstated or replanted in accordance with Section 6.3 of the **Outline Ecological Protection and Mitigation Strategy [REP1-106]**. The Applicant also confirms that matters relating to acquisition of new or existing rights in land are		

Reference	Theme	Issue	Comments/ Issue Raised	Applicant's Response to Written Representation	NH Response	Applicant's Response
				addressed through the updated Protected Provisions for the protection of National Highways have been agreed and are included at Part 5 of Schedule 15 (Protective Provisions) to the revised **Draft Development Consent Order [REP1-007]** submitted at Deadline 1.		
NH-026	Transport and Access	Trees Subject to	Article 41 – Trees Subject to Tree	The Applicant notes this	We have checked Article 41 in the	The Applicant confirms that Article 41 was corrected

Reference	Theme	Issue	Comments/ Issue Raised	Applicant's Response to Written Representation	NH Response	Applicant's Response
	Arboriculture	Tree Preservation Orders	Preservation Orders: NH notes a potential reference error (Part 4 of Schedule 12 is cited but only Parts 1–3 exist). TPO42 is in close proximity to NH's network and NH's comments on cumulative impact apply. TPO7 is not referred to in Schedule 12 but is adjacent to the SRN, and the Applicant is requested to review Schedule 12 in light of the TPO and	comment and confirms that the typographical error identified by National Highways has been corrected within the revised **Draft Development Consent Order [REP1-007]** submitted at Deadline 1.	revised **Draft Development Consent Order [REP1-007]** submitted at Deadline 1. No amendments have been made. The article still refers to Part 4 of Schedule 12. The Protective Provisions on the are not yet agreed. Discussions are on going. In any event, the Applicant should be required to obtain NH consent in the event the activities affect the SRN or any land National Highways has an interest in. As a public	in the **Draft DCO [REP3-005]** submitted at Deadline 3. In respect of National Highways' comments made in respect of protective provisions and the SRN, the Applicant refers National Highways to its response given at NH-024.

Reference	Theme	Issue	Comments/ Issue Raised	Applicant's Response to Written Representation	NH Response	Applicant's Response
			Hedgerow Plan (sheet 9 of 23). NH also has environmental mitigation commitments that may be affected. NH notes the comments on the reference error and will confirm agreement once NH has considered the updated Draft Development Consent Order submitted a t Deadline 1.		body, NH is under a duty to act reasonably in providing such consent and this in expressly provided in NH's proposed protective provisions.	
NH-027	Transport and Access	Certification of Plans and Documents	Article 42 – Certification of Plans and Documents: NH	Where relevant and proportionate Nati onal Highways, as	The additional wording in Schedule 16 is welcomed. NH mainta in that it may have	The Applicant welcomes National Highways' comment in respect of Schedule 16 and confirms that

Reference	Theme	Issue	Comments/ Issue Raised	Applicant's Response to Written Representation	NH Response	Applicant's Response
			reserves the ability to request the addition of any required plans or documents to those identified in Schedule 12. The Applicant's position is that the list in Schedule 13 is fixed and cannot be amended unilaterally. NH may have comments on those certified documents during the course of the examination, and the matter is to be kept under review.	the relevant highway authority, has been included as a named consultee in the Requirements contained within Schedule 2 (Requirements) to the Draft Development Consent Order. The Applicant has also added National Highways as a named consultee to Requirement 20 (Decommissioning and restoration) within the revised **Draft**	comments on the certified document list during the course of the examination.	it encourages ongoing engagement.

Reference	Theme	Issue	Comments/ Issue Raised	Applicant's Response to Written Representation	NH Response	Applicant's Response
				Development Consent Order [REP1-007] submitted at Deadline 1. As a result, National Highways will be consulted by the relevant planning authority on the final Construction Traffic Management Plan, Public Rights of Way and Permissive Paths Management Plan and Decommissioning Plan, all of which		

Reference	Theme	Issue	Comments/ Issue Raised	Applicant's Response to Written Representation	NH Response	Applicant's Response
				are contained at Schedule 13 (Documents and plans to be certified) to the **Draft Development Consent Order [REP1-007].** The Applicant has also added wording to paragraph 1 (Interpretation) of Schedule 16 (Procedure for the discharge of requirements) to the revised **Draft Development Consent Order [REP1-007]** submitted at		

Reference	Theme	Issue	Comments/ Issue Raised	Applicant's Response to Written Representation	NH Response	Applicant's Response
				Deadline 1 which provides that, where an approved document is amended as per Requirement 3 (Approved documents and amendments to them) within Schedule 2 (Requirements), National Highways will also be consulted. As such, the Applicant considers that National Highways will have sufficient opportunity to		

Reference	Theme	Issue	Comments/ Issue Raised	Applicant's Response to Written Representation	NH Response	Applicant's Response
				comment on the certified documents relevant to it and therefore does not consider it proportionate to include any further provision in respect of Schedule 13.		
NH-028	Transport and Access	Deemed Consent	Article 47 – Deemed Consent: - NH objects to the principle of deemed consent applying to any works on or under the SRN, given the safety implications of unreviewed works affecting the	The Applicant notes this comment and confirms that updated Protected Provisions for the protection of National Highways have been agreed and are included at Part 5 of	The Protective Provisions on the are not yet agreed. Discussions are on going.	The Applicant refers National Highways to its response given to NH-002.

Reference	Theme	Issue	Comments/ Issue Raised	Applicant's Response to Written Representation	NH Response	Applicant's Response
			strategic road network.	Schedule 15 (Protective Provisions) to the revised **Draft Development Consent Order [REP1-007]** submitted at Deadline 1.		
NH-029	Transport and Access	Schedule 2 Requirements	5. Schedule 2 Requirements 5.1. NH's position is that it should be given the opportunity not merely to be consulted, but to review and agree the relevant documents and plans before they are discharged, to	The Applicant notes this comment and confirms that updated Protected Provisions for the protection of National Highways have been agreed and are included at Part 5 of Schedule 15 (Protective	The Protective Provisions on the are not yet agreed. Discussions are on going. The addition of NH in its capacity as relevant highway authority as a named consultee in Requirement 20 is welcomed. However, NH's position is that it should be given the opportunity not merely	In respect of National Highways' comments made in respect of protective provisions and the SRN, the Applicant refers National Highways to its response given at NH-024. With regard to National Highways' comment in respect of its review of control documents, the Applicant maintains its position as set out at NH-029

Reference	Theme	Issue	Comments/ Issue Raised	Applicant's Response to Written Representation	NH Response	Applicant's Response
			ensure that any changes do not adversely impact the Strategic Road Network (SRN). NH maintains that inclusion of its proposed drafting (shown in red in its Relevant Representations) would address its concerns in each case. 5.2. The Applicant's overarching response is that NH will already be a consultee where it is the relevant	Provisions) to the revised **Draft Development Consent Order [REP1-007]** submitted at Deadline 1. The Applicant has also added National Highways, in its capacity as relevant highway authority, as a named consultee within Requirement 20 (Decommissioning and restoration) within the revised **Draft**	to be consulted, but to review and agree the relevant documents and plans before they are discharged, to ensure that any changes do not adversely impact the Strategic Road Network (SRN). NH maintains that inclusion of its proposed drafting (shown in red in its Relevant Representations) would address its concerns in each case.	in the **Applicant's Response to Written Representations [REP2-039]** and considers these measures to be proportionate and sufficient.

Reference	Theme	Issue	Comments/ Issue Raised	Applicant's Response to Written Representation	NH Response	Applicant's Response
			highway authority for the discharge of certain Requirements (namely Requirements 15 and 16), and that NH's involvement where its interests may be affected will be controlled by the Protective Provisions for its benefit contained in Part 5 of Schedule 15 to the draft DCO. The Applicant has stated that the management plans with the potential to impact the SRN	**Development Consent Order [REP1-007]** submitted at Deadline 1 following discussions with National Highways. The Applicant maintains that these measures are proportionate and sufficient in protecting the SRN but welcomes ongoing engagement with National Highways.		

Reference	Theme	Issue	Comments/ Issue Raised	Applicant's Response to Written Representation	NH Response	Applicant's Response
			are already captured. As set out above, the parties are progressing discussions in respect of the form of Protective Provisions.			
NH-030	Transport and Access	Requirement -Specific Positions	5.3. Requirement-Specific Positions Requirement 3 (Approved Documents and Plans): Requirement 3 permits the undertaker to submit any	Following discussions with National Highways, The Applicant has added wording to paragraph 1 (Interpretation) of Schedule 16 (Procedure for the discharge of requirements) to the revised **Draft Development**	NH position on Requirement 3 remains as set out, despite the additional wording now inserted by the Applicant at Schedule 16. The Schedule 16 change however, does not meet NH's concerns regarding ce rtified documents being amended and hence NH	The Applicant maintains its position as set out at NH-030 and NH-031 of the **Applicant's Response to Written Representations [REP2-039]** and considers these measures to be proportionate and sufficient.

Reference	Theme	Issue	Comments/ Issue Raised	Applicant's Response to Written Representation	NH Response	Applicant's Response
			amendments to any approved document to the relevant planning authority for approval and, following approval, the relevant approved document is to be taken to include the amendments approved under that Requirement. The relevant planning authority must not approve any amendments to any approved document unless it has been	**Consent Order [REP1-007]** submitted at Deadline 1 which provides that, where an approved document is amended as per Requirement 3 (Approved documents and amendments to them) within Schedule 2 (Requirements), National Highways will also be consulted. As noted, this is in line with the same provision made in respect of the	also require to be listed as a consultee in Requirement 3 itself.	

Reference	Theme	Issue	Comments/ Issue Raised	Applicant's Response to Written Representation	NH Response	Applicant's Response
			demonstrated to the satisfaction of the relevant planning authority that the subject matter of the approval sought is unlikely to give rise to any materially new or materially different environmental effects in comparison with those reported in the environmental statement. Sub-paragraph (3) indicates that "approved document" means any document certified under	draft Green Hill Solar Farm Order 202. That Applicant considers that this, in combination with the updated Protected Provisions for the protection of National Highways which have been agreed and are included at Part 5 of Schedule 15 (Protective Provisions) to the revised **Draft Development**		

Reference	Theme	Issue	Comments/ Issue Raised	Applicant's Response to Written Representation	NH Response	Applicant's Response
			article 42 (certification of plans and documents, etc.) and any plans, details or schemes which have been approved pursuant to any requirement. This could involve changes to the work plans and it is left to the planning authority to determine whether those changes will give rise to a materially new or materially different	**Consent Order [REP1-007]** submitted at Deadline 1, are proportionate and sufficient in protecting National Highways' interests.		

Reference	Theme	Issue	Comments/ Issue Raised	Applicant's Response to Written Representation	NH Response	Applicant's Response
			environmental effect. National Highways would expect to be consulted on that decision. This issue was raised in the Green Hill Solar Farm dDCO examination (Planning Inspectorate DCO Reference EN010170) which closed on 13 April 2026 and for which the Applicant is the same as for the Lime Down DCO. During the Green Hill Farm dDCO exam			

Reference	Theme	Issue	Comments/ Issue Raised	Applicant's Response to Written Representation	NH Response	Applicant's Response
			ination, the Applicant agreed to update Paragraph 1 of Schedule 16. The revised text of Schedule 16 is provided in Appendix 1 to this Written Representation. The revised wording means that in relation to an application made under requirement 3 to amend an approved document, any body or authority that was required to be			

Reference	Theme	Issue	Comments/ Issue Raised	Applicant's Response to Written Representation	NH Response	Applicant's Response
			consulted in relation to the approval of that approved document is required again to be consulted. NH require the same amendment to the Lime Down dDCO. The inclusion of such wording would mean that should an application be made to amend the Construction Traffic Management Plan, highway authorities are consultees and			

Reference	Theme	Issue	Comments/ Issue Raised	Applicant's Response to Written Representation	NH Response	Applicant's Response
			would need to be consulted on any application to amend. This change alone, however, does not meet NH's concerns regarding certified documents being amended and hence NH also require to be listed as a consultee in Requirement 3 itself.			
NH-031	Transport and Access	Requirement-Specific Positions	5.4. Additionally, NH seeks to be consulted on the discharge of a wide range of Requirements,	National Highways, in its capacity as relevant highway authority, is named as a	NH position on requirement specific positions remains as set out. NH seeks to be consulted on the discharge of a wide	The Applicant refers National Highways to its response given at NH-030 above in respect of the discharge of Requirements.

Reference	Theme	Issue	Comments/ Issue Raised	Applicant's Response to Written Representation	NH Response	Applicant's Response
			including Requirements 3, 7, 8, 10, 11, 13, 14, in relation to matters relating to NH's statutory function. Requirement 5 (Details of Works Nos. 1, 2, 3 and 5a). NH requires amendments to Requirement 5 as set out in its Relevant Representations.	consultee for Requirements 15 (Construction traffic management plan), 16 (Public rights of way and permissive paths) and 20 (Decommissioning and restoration) within Schedule 2 (Requirements) to the **Draft Development Consent Order [REP1-007].** In addition to this, the Applicant has included updated and agreed Protected Provisions for the	range of Requirements, including Requirements 3, 7, 8, 10, 11, 13, 14, in relation to matters relating to NH's statutory function and/or any interest in land which should sufficiently address the Applicant's concern that NH having a consultee role will unnecessarily delay discharge of requirements. NH has no intention to unnecessarily impede the delivery of the scheme but requires to be consulted in order to protect the SRN and	In respect of National Highways' comments made in relation to protective provisions and the SRN, the Applicant refers National Highways to its response given at NH-024.

Reference	Theme	Issue	Comments/ Issue Raised	Applicant's Response to Written Representation	NH Response	Applicant's Response
				protection of National Highways at Part 5 of Schedule 15 (Protective Provisions) to the revised **Draft Development Consent Order [REP1-007]** submitted at Deadline 1. The Applicant therefore considers these measures to be proportionate and sufficient in protecting National Highways' interests without	NH's land interest. In relation to the PP's, the Protective Provisions on the are not yet agreed. Discussions are on going.	

Reference	Theme	Issue	Comments/ Issue Raised	Applicant's Response to Written Representation	NH Response	Applicant's Response
				including unnecessary consultee requirements which may delay discharge of Requirements and impede the future delivery of the Scheme. The Applicant does however welcome ongoing engagement with National Highways.		
NH-032	Transport and Access Ecology and Biodiversity Landscape	Landscape and Ecological Management Plan	Requirement 7 (Landscape and Ecological Management Plan)- NH requires the opportunity to	The Applicant notes this comment and refers National Highways to the	See response to NH-031 above	The Applicant refers National Highways to its response given above to NH-030.

Reference	Theme	Issue	Comments/ Issue Raised	Applicant's Response to Written Representation	NH Response	Applicant's Response
	and Visual Arboriculture		review the landscape and ecological management plan, arboricultural assessment/tree protection measures, and any replanting proposals in respect of NH's soft estate.	response given to NH-031. The Applicant does however welcome ongoing engagement with National Highways.		
NH-033	Transport and Access Ecology and Biodiversity	Ecological Protection and Mitigation Strategy	Requirement 8 (Ecological Protection and Mitigation Strategy): NH requires the opportunity to review the details proposed in the ecological protection and	The Applicant notes this comment and refers National Highways to the response given to NH-031. The Applicant does however	See response to NH-031 above	The Applicant refers National Highways to its response given above to NH-030.

Reference	Theme	Issue	Comments/ Issue Raised	Applicant's Response to Written Representation	NH Response	Applicant's Response
			mitigation strategy.	welcome ongoing engagement with National Highways.		
NH-034	Transport and Access	Means of Enclosure	Requirement 10 (Fencing and other means of Enclosure): NH requires the opportunity to review the details of any proposed fences, walls, or enclosures if within the vicinity of the SRN, for reasons of safety, liability, and maintenance, and to ensure compliance with paragraph 57 of	The Applicant notes this comment and refers National Highways to the response given to NH-031. The Applicant does however welcome ongoing engagement with National Highways.	See response to NH-031 above	The Applicant refers National Highways to its response given above to NH-030.

Reference	Theme	Issue	Comments/ Issue Raised	Applicant's Response to Written Representation	NH Response	Applicant's Response
			DfT Circular 01/2022.			
NH-035	Transport and Access Hydrology, Flood Risk and Drainage	Surface Water Drainage Scheme	Requirement 11 (Surface and foul water drainage): NH requires the opportunity to review the details of the surface water and foul water drainage system to ensure the integrity of the SRN drainage infrastructure is not interfered with, and that plans accord with DfT Circular 01/2022. NH emphasises that no surface water run-off from the	The Applicant notes this comment and refers National Highways to the response given to NH-031. The Applicant does however welcome ongoing engagement with National Highways.	See response to NH-031 above	The Applicant refers National Highways to its response given above to NH-030.

Reference	Theme	Issue	Comments/ Issue Raised	Applicant's Response to Written Representation	NH Response	Applicant's Response
			development shall be discharged into the SRN drainage systems and no new third-party drainage connections will be permitted.			
NH-036	Transport and Access Construction and Decommissioning	Construction Environmental Management Plan	Requirement 13 (Construction Environmental Management Plan): NH requires the opportunity to review the CEMP to ensure appropriate safeguards are implemented and maintained, with consideration of potential	The Applicant notes this comment and refers National Highways to the response given to NH-031. The Applicant does however welcome ongoing engagement	See response to NH-031 above	The Applicant refers National Highways to its response given above to NH-030.

Reference	Theme	Issue	Comments/ Issue Raised	Applicant's Response to Written Representation	NH Response	Applicant's Response
			impacts on the SRN.	with National Highways.		
NH-037	Transport and Access	Operational Environmental Management Plan	Requirement 14 (Operational Environmental Management Plan): NH requires the opportunity to review the operational environmental management plan to ensure the management of long-term environmental risks associated with the site and ongoing protection of the SRN.	The Applicant notes this comment and refers National Highways to the response given to NH-031. The Applicant does however welcome ongoing engagement with National Highways.	See response to NH-031 above	The Applicant refers National Highways to its response given above to NH-030.

Reference	Theme	Issue	Comments/ Issue Raised	Applicant's Response to Written Representation	NH Response	Applicant's Response
NH-038	Transport and Access	Construction Traffic Management Plan	Requirement 15 (Construction Traffic Management Plan): NH requires the opportunity to review the details of the construction traffic management plan. The Applicant notes that NH was involved as a consultee during the preparation of the outline Construction Traffic Management Plan [APP-287]. NH's position is that it	Requirement 15 (Construction traffic management plan) of Schedule 2 (Requirements) to the **Draft Development Consent Order [REP1-007]** provides that, before approving the final construction traffic management plan the relevant planning authority must consult with National Highways in its capacity as relevant highway authority.	The position is noted and welcomed.	The Applicant welcomes this comment.

Reference	Theme	Issue	Comments/ Issue Raised	Applicant's Response to Written Representation	NH Response	Applicant's Response
			also needs to be a consultee on the final Construction Traffic Management Plan, rather than just the outline, as matters may change. It is understood this has now been agreed with the Applicant.	As such, National Highways will be consulted in respect of the final construction traffic management plan (which must be substantially in accordance with the outline version) as part of the discharge of Requirement 15 in accordance with Schedule 16 (Procedure for the discharge of Requirements).		
NH-039	Transport and Access	Public Rights of Way and	Requirement 16 (Public Rights of Way and	The Applicant notes this comment and	The position is noted and welcomed.	The Applicant welcomes this comment.

Reference	Theme	Issue	Comments/ Issue Raised	Applicant's Response to Written Representation	NH Response	Applicant's Response
	Socio-Economics, Recreation and Tourism	Permissive Paths	Permissive Paths): Whilst not included in NH's Relevant Representation, it has been agreed with the Applicant that NH as relevant highway authority will be consulted on the discharge of this requirement.	welcomes ongoing engagement with National Highways.		
NH-040	Transport and Access Construction and Decommissioning	Decommissioning Plan	Requirement 20 (Decommissioning and Restoration): NH requires the opportunity to review the decommissioning plan, including a transport	Requirement 20 (Decommissioning and restoration) of Schedule 2 (Requirements) to the revised **Draft Development Consent Order [REP1-007]** submitted at	The position is noted and welcomed.	The Applicant welcomes this comment.

Reference	Theme	Issue	Comments/ Issue Raised	Applicant's Response to Written Representation	NH Response	Applicant's Response
			assessment and construction environmental impacts, to ensure the decommissioning process will not adversely affect the SRN. The Applicant referred to its position on NH's involvement as a consultee on the various management plans, including the outline Decommissioning Strategy. NH's position is that it also needs to be a consultee on the final	Deadline 1 provides that, before approving the final decommissioning plan the relevant planning authority must consult with National Highways in its capacity as relevant highway authority. As such, National Highways will be consulted in respect of the final decommissioning plan (which must be substantially in accordance with		

Reference	Theme	Issue	Comments/ Issue Raised	Applicant's Response to Written Representation	NH Response	Applicant's Response
			Decommissioning Strategy, rather than just the outline, since matters may have changed. It is understood this has now been agreed with the Applicant.	the **Outline Decommissioning Strategy [REP1-100]**) as part of the discharge of Requirement 20 in accordance with Schedule 16 (Procedure for the discharge of Requirements).		
NH-041	Transport and Access	Discharge of Requirements	6.Schedule 16 (Discharge of Requirements) 6.1. NH's concerns in relation to Schedule 16 as set out in its Relevant	Following discussions with National Highways, The Applicant has added wording to paragraph 1 (Interpretation) of Schedule 16 (Procedure for the discharge of	The position is noted and welcomed. NH's concern in relation to Requirement 3 remains as set out.	The Applicant refers National Highways to its response given above to NH-030 in respect of Requirement 3.

Reference	Theme	Issue	Comments/ Issue Raised	Applicant's Response to Written Representation	NH Response	Applicant's Response
			Representation re mains.	requirements) to the revised **Draft Development Consent Order [REP1-007]** submitted at Deadline 1 which provides that, where an approved document is amended as per Requirement 3 (Approved documents and amendments to them) within Schedule 2 (Requirements), National Highways will also be consulted. As noted, this is in		

Reference	Theme	Issue	Comments/ Issue Raised	Applicant's Response to Written Representation	NH Response	Applicant's Response
				line with the same provision made in respect of the draft Green Hill Solar Farm Order 202[*]. That Applicant considers that this, in combination with the updated Protected Provisions for the protection of National Highways which have been agreed and are included at Part 5 of Schedule 15 (Protective		

Reference	Theme	Issue	Comments/ Issue Raised	Applicant's Response to Written Representation	NH Response	Applicant's Response
				Provisions) to the revised **Draft Development Consent Order [REP1-007]** submitted at Deadline 1, are proportionate and sufficient in protecting National Highways' interests.		
NH-042	Transport and Access	Construction Traffic Management Plan	7. Traffic and Transport 7.1. NH note and accept that no further capacity assessment of the SRN is required. However, NH maintain the need for the	The Applicant notes this comment. Requirement 15 (Construction traffic management plan) of Schedule 2 (Requirements) to the **Draft**	The position is noted and welcomed.	The Applicant welcomes this comment.

Reference	Theme	Issue	Comments/ Issue Raised	Applicant's Response to Written Representation	NH Response	Applicant's Response
			Construction Traffic Management Plan (CTMP) under Requirement 15 and the rationale for changes to that requirement which NH considers necessary.	**Development Consent Order [REP1-007]** provides that, before approving the final construction traffic management plan the relevant planning authority must consult with National Highways in its capacity as relevant highway authority. That Applicant considers that this, in combination with the updated		

Reference	Theme	Issue	Comments/ Issue Raised	Applicant's Response to Written Representation	NH Response	Applicant's Response
				Protected Provisions for the protection of National Highways which have been agreed and are included at Part 5 of Schedule 15 (Protective Provisions) to the revised **Draft Development Consent Order [REP1-007]** submitted at Deadline 1, are proportionate and sufficient in protecting National Highways' interests.		

Reference	Theme	Issue	Comments/ Issue Raised	Applicant's Response to Written Representation	NH Response	Applicant's Response
				The Applicant also welcomes ongoing engagement with National Highways.		
NH-043	Consultation and Engagement Transport and Access	Statement of Common Ground	8. Statement of Common Ground 8.1. A draft Statement of Common Ground has been provided by the Applicant. NH have reviewed the same and have responded to the Applicant noting where matters are	The Applicant notes this comment.	The Statement of Common Ground remains under discussion	The Applicant confirms that there is ongoing engagement with National Highways regarding the Statement of Common Ground and the first draft was submitted at Deadline 2 **[REP2-030]**. The Applicant anticipates submitting an updated draft at a future deadline.

Reference	Theme	Issue	Comments/ Issue Raised	Applicant's Response to Written Representation	NH Response	Applicant's Response
			and are not agreed. Further discussions are ongoing.			

3.3 Royal Mail

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
RM-001	Transport and Access	Introduction	Further to its s42 consultation response dated March 2025 and s56 relevant representation submitted in January 2025, Royal Mail and its consultants BNP Paribas Real Estate have reviewed Lime Down Solar Park Ltd's Outline Construction Traffic Management Plan dated April 2026. Set out below are Royal Mail's comments on the Outline Construction Traffic Management Plan dated in May 2026, preceded by relevant information about Royal Mail, as previously made available.	The Applicant notes this comment.
RM-002	Transport and Access	Royal Mail – relevant information	Royal Mail – relevant information Under section 35 of the Postal Services Act 2011, Royal Mail has been designated by Ofcom as a provider of the Universal Postal Service. Royal Mail is the only such provider in the United Kingdom. The Act provides that Ofcom's primary	The Applicant notes Roysl Mail's duty as the Universal Post Provider as per the response set out in the Applicant's Response to Relevant Representations (Part 1) **[PDA-009]**.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			regulatory duty is to secure the provision of the Universal Postal Service. Ofcom discharges this duty by imposing regulatory conditions on Royal Mail, requiring it to provide the Universal Postal Service. Royal Mail is under some of the highest specification performance obligations for quality of service in Europe. Its performance of the Universal Service Provider obligations is in the public interest and this should not be affected detrimentally by any statutorily authorised project. Royal Mail's postal sorting and delivery operations rely heavily on road communications. Royal Mail's ability to provide efficient mail collection, sorting and delivery to the public is sensitive to changes in the capacity of the highway network. Royal Mail is a major road user nationally. Disruption to the highway network and traffic delays can have direct consequences on Royal Mail's operations, its ability to meet the	

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			Universal Service Obligation and comply with the regulatory regime for postal services thereby presenting a significant risk to Royal Mail's business.	
RM-003	Transport and Access		Royal Mail has 7 operational properties within 10 miles of the proposed scheme boundary (including the export cable corridor area of search). 1. Chippenham DO c. 200 metres 2. Melksham DO/FPO/LAN – c. 2km 3. Tetbury DO – c.7.5km 4. Calne DO – c.8.5km 5. Calne PAR – c.8.5km 6. Trowbridge DO/RTW – c. 8.3km 7. Bradford on Avon DO – c.9km Any periods of road disruption / closure, night or day, on or to the surrounding highway network will have the potential to impact operations and may consequently disrupt Royal Mail's ability to meet its Universal Obligation service delivery targets.	The Applicant can confirm that traffic management and banksmen will be the preferred measures to be implemented rather than any road closures. If a road closure is required suitable diversion routes will be implemented to maintain access to the local areas and would be short term.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			Royal Mail's performance of the Universal Service Provider obligations is in the public interest and as indicated above should not be affected detrimentally by any statutorily authorised project. Accordingly, Royal Mail seeks to take all reasonable steps to protect its assets and operational interests from any potentially adverse impacts of proposed development.	
RM-004	Transport and Access		Royal Mail position on Lime Down Solar Park at June 2026 The construction works for this new solar farm and its associated infrastructure will be of a scale, nature and duration that has potential to impact Royal Mail's road-based distribution and delivery services.	An assessment of delay to existing road users is included in **ES Volume 1, Chapter 13: Transport and Access (Rev3) [REP3-019]** the levels of daily and hourly trips combined with **Outline CTMP (Rev 3) [REP3-108]** measures such as restricted delivery times , would not result in unacceptable delays and impact on delivery services.
RM-005	Transport and Access		Advanced knowledge of any Traffic Management, road closures or other works affecting the public highway,	The final CTMP will include detailed information on proposed traffic management measures and

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			its capacity or journey times is usually the key to enable Royal Mail to manage impacts on its operations and business. To this end Royal Mail requires full commitment to advanced notification of works affecting the highway by the Applicant or its contractors.	construction program, and this will be submitted into the public domain via WC for approval.
RM-006	Transport and Access		Royal Mail does not wish to stop or delay the construction works for this important infrastructure project from occurring. However, Royal Mail does wish to ensure the protection of its future ability to provide an efficient mail sorting and delivering service to the public in accordance with its statutory obligations.	The final CTMP will include detailed information on proposed traffic management measures and construction program, and this will be submitted into the public domain via WC for approval.
RM-007	Transport and Access		In order to adequately protect Royal Mail's interests, it is requested that the Outline Construction Traffic Management Plan includes the following mitigations, which if	The Applicant makes note of this comment.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			included would address Royal Mail's concerns:	
RM-008	Transport and Access		1. a requirement that during the construction phase Royal Mail is notified by Lime Down Solar Park Ltd or its contractors at least one month in advance on any proposed road closures / diversions / alternative access arrangements, hours of working;	Please provide contact details and we will add this into the Outline CTMP **[REP3-108].**
RM-009	Transport and Access		2. where road closures / diversions are proposed, Lime Down Solar Park Ltd or its contractors should be required to liaise with Royal Mail at least one month in advance to identify and make available alternative highway routes for operational use, where possible; and	The final CTMP will include detailed information on proposed traffic management measures and construction program, and this will be submitted into the public domain via WC for approval.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
RM-010	Transport and Access		3. a mechanism that informs Royal Mail about any other works affecting the local highways network (having regard in particular to the above identified operational R oyal Mail sites in the area surrounding the proposed new solar farm and its associated infrastructure).	The Applicant will add Royal Mail to the community liaison group as detailed in the Outline CEMP **[REP3-108]**). Please provide a contact.
RM-011	Transport and Access		Royal Mail wishes to reserve its position to submit further representations to the future Public Examination, if required.	The Applicant makes note of this comment.

3.4 Cotswolds National Landscape Board

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
CNL-001	Scheme Description and DCO Process	Introduction	PINS REFERENCE NO: EN010168 DESCRIPTION: Development consent to construct, operate, maintain and decommission a solar photovoltaic (PV) generating station, with a generating capacity of more than 50 megawatts (MW) and associated infrastructure LOCATION: Lime Down Solar Park, Wiltshire This response comprises the Cotswolds National Landscape Board's (the 'Board's') Written Representations for submission at Examination Deadline 3 - 15 June 2026 to update the Board's position regarding the Potential Main Issues for Examination (PMIEs) that have been the ongoing subject of discussion with the Applicant and	The Applicant notes this comment and has provided. responses to the further commentary received regarding the f our outstanding PMIEs in the relevant rows below. Table 3.1 in **Statement of Common Ground with Cotswolds National Landscape Board [REP2-029]** confirms that these outstanding matters remain Under Discussion with the Cotswold National Landscape Board.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			which have been further informed by submissions made at Deadlines 1 and 2. Update on the Board's position regarding the Potential Main Issues for Examination (PMIEs) Our Relevant Representations (RR-0944) outlined that eight PMIEs had been identified by the Board following Statutory Consultation and ongoing liaison with the Applicant and that currently, four PMIEs remain outstanding: 1. Whether the Scheme has the potential to give rise to significant adverse environmental effects upon the Cotswolds National Landscape ('CNL') designation and its setting. In addition, whether the Scheme would seek to further the purpose of CNL	

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			designation in respect of the statutory duty outlined at s.85 of the Countryside and Rights of Way Act 2000 (as amended). 4. Routing of construction traffic for sites A, B and C and the potential impact upon the tranquillity and landscape and scenic beauty of the CNL. 6. Potential removal of panels from fields C7 and C9 pending the results of further assessment. 8. Details regarding potential appropriate measures to compensate for any assessed residual adverse effects of the development on the natural beauty of the CNL and its setting to enable the statutory duty to seek to further the conservation and enhancement of its natural beauty (Section 85 of the Countryside and Rights of Way Act 2000, as amended) to be discharged.	

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			Following the submission of further information at Deadlines 1 and 2, an update on these PMIEs is given below, firstly discussing PMIEs 4 and 6, before the overarching PMIEs 1 and 8.	
CNL-002	Transport and Access Landscape and Visual Noise and Vibration	PMIE 4	<u>PMIE 4</u> This PMIE concerns the routing of construction traffic for sites A, B and C and for several access points for the Cable Route Corridor and the impact this traffic would have on the tranquillity of the CNL, one of its special qualities. The Board notes and welcomes the Applicant's submission of i) a Tranquillity Technical Note (PDA-010, dated March 2026), submitted on 9 March 2026 and ii) the Construction Routes in the	Noted

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			Cotswolds National Landscape Technical Note (REP1-131, dated May 2026), submitted at Deadline 1.	
CNL-003	Transport and Access Landscape and Visual Noise and Vibration	PMIE 4	*Comments relating to the Construction Routes in the Cotswolds National Landscape Technical Note (REP1-131)* Turning first to the latter document, this responds to a request from the Board to justify the selection of the proposed construction routes through the Cotswold National Landscape (CNL) to access Lime Down A, B and C, as well as access locations 101 to 108 serving the Cable Route Corridor.	Noted
CNL-004	Transport and Access Landscape and Visual Noise and Vibration	PMIE 4	The Applicant anticipates that *"adverse effects may arise from the implementation of the proposed construction routes through the CNL, however, these are not significant and would be reduced by the mitigation measures summarised in*	Noted

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			Section 4.4 of this TN" (REP1-131, paragraph 2.1.3).	
CNL-005	Transport and Access Landscape and Visual Noise and Vibration	PMIE 4	Having reviewed the document, the Board considers that the Construction Routes Technical Note (REP1-131) is written from a purely highways standpoint and does not adequately consider the impact of routing the construction traffic on the CNL's tranquillity, which from the Board's perspective, lies at the heart of this issue and formed the basis of the request for this Technical Note. Paragraph 2.2.1 lists the highways-related factors taken into consideration when deciding on the construction routes, but the list does not mention any considerations relating to natural beauty, such as tranquillity or landscape and visual impact.	The Applicant notes this comment and is intending on submitting an updated Tranquillity Assessment at Deadline 5.
CNL-006	Transport and Access	PMIE 4	Furthermore, some of the criteria used to assess and subsequently discount alternative routes could equally apply	The Applicant reviewed transport aspect of the routes in the same way as Wiltshire Highways. Wiltshire Council has agreed that the

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
	Landscape and Visual Noise and Vibration		to the routes that have been selected, including those through the CNL; for example,'villages/residential centres' and 'extensive lengths of single lane carriageway'. Also, the Technical Note does not assess the selected routes to the same level of detail in respect of the selected criteria as the discounted routes. Whilst agreement between the Applicant and Wiltshire Council regarding the construction routes is acknowledged, it is assumed that this agreement was obtained following consultation with the Council's Highways team, whose remit would not reasonably include consideration of CNL and natural beauty issues.	identified routes that travel to Lime Down Site A-C are the most suitable as set out at 3.9.19 of the **Statement of Common Ground with Wiltshire Council [REP2-025].** In terms of assessing tranquillity, the traffic flows were provided to the Applicants landscape consultant in line with the ISEP guidance to assess the routes further. The Applicant is intending to submit an updated Tranquillity Assessment at Deadline 5.
CNL-007	Landscape and Visual Noise and Vibration	PMIE4	*Comments relating to the Tranquillity Technical Note (PDA-010)*	The Applicant notes this comment and is intending on submitting an updated Tranquillity Assessment at Deadline 5.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			Tranquillity is one of the CNL's 'special qualities'; in other words, it is one of the features of the Cotswolds that makes the area so outstanding that it is in the nation's interest to safeguard it. As well as being a 'special quality' in its own right, tranquillity is also an important factor in people's understanding and enjoyment of the CNL's other special qualities, including its distinctive landscapes and settlements, its historic and cultural associations and its flower-rich grasslands and ancient broadleaved woodlands. Natural England has also identified relative tranquillity as one of six factors that contribute to the natural beauty of Areas of Outstanding Natural Beauty.	
CNL-008	Landscape and Visual Noise and Vibration	PMIE 4	In attempting to assess the impact of the Scheme on the CNL's tranquillity, regard should be had to Core Policy 51 of the Wiltshire Core Strategy	The Applicant notes this comment and is intending on submitting an updated Tranquillity Assessment at Deadline 5.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
	Other Environmental Matters: Glint and Glare		which states that proposals "will need to demonstrate that …aspects of landscape character have been conserved and where possible enhanced through sensitive design, landscape mitigation and enhancement measures". One of these aspects is "Tranquillity and the need to protect against intrusion from light pollution, noise, and motion".	
CNL-009	Landscape and Visual Noise and Vibration Other Environmental Matters: Glint and Glare	PMIE 4	Policy CE5 of the CNL Management Plan also states "CE5.1. Proposals that have the potential to impact on the tranquillity of the Cotswolds National Landscape (CNL) should be delivered in a way that is compatible with and seek to further the conservation and enhancement of this tranquillity, by seeking to avoid and where avoiding is not possible, minimise noise and other aural and visual disturbance… CE5.3. Proposals that have the potential to impact on the tranquillity of the	The Applicant notes this comment and is intending on submitting an updated Tranquillity Assessment at Deadline 5.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			CNL should have regard to – and be compatible with – the CNL Board's Tranquillity Position Statement".	
CNL-010	Landscape and Visual	PMIE 4	Paragraph 5.10.34 of NPS EN-1 also confirms that the duty to seek to further the purposes of nationally designated landscapes (Section 85 of the Countryside of Rights of Way Act 2000, as amended) applies when considering applications for projects outside the boundaries of these areas, which may have impacts within them. The aim should be to avoid harming the purposes of designation or to minimise adverse effects on designated landscapes, and such projects should be designed sensitively given the various siting, operational, and other relevant constraints.	The Applicant notes this comment.
CNL-011	Landscape and Visual Transport and Access	PMIE 4	In their response (PDA-009) to the Board's Relevant Representations, the Applicant states, "It is recognised that there are some short-term construction effects within the	The Applicant notes this comment.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			CNL as a result of construction traffic and site access of abnormal loads. Details of this and the effect on the landscape are considered unavoidable, temporary, and not significant". The Applicant's Tranquillity Technical Note (PDA-010) attempts to characterize, and provide justification for, this position on the Scheme's likely effects on the CNL's tranquillity.	
CNL-012	Landscape and Visual Transport and Access Noise and Vibration	PMIE 4	The Board shares the view expressed by Wiltshire Council in their written representations at Deadline 1 (REP1-138) that the Tranquillity Technical Note mainly repeats information from the ES, particularly that relating to transport and access (i.e. ES Chapter 13) and noise and vibration (i.e. ES Chapter 14). Our understanding is that the content of these ES chapters was scoped and agreed with no input from a tranquillity/landscape viewpoint and these chapters do not	The Applicant notes this comment and is intending on submitting an updated Tranquillity Assessment at Deadline 5.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			consider the Board's Management Plan policy CE5 (Tranquillity) or the Board's Tranquillity Position Statement. An example of this is observed by Wiltshire Council in REP1-138 that "although tranquillity is considered to be a considerable asset of landscape (Guidelines for Landscape and Visual Impact Assessment (LVIA) (3rd edition) glossary page 158) the survey work has been predicated on standard noise modelling methodology and acoustic modelling software (ISO 9613:2024) utilising the Lowest Observable Adverse Effect Level (LOAEL) and Significant Observable Adverse Effect Level (SOAEL) for construction and operational noise" (our emphasis).	
CNL-013	Noise and Vibration	PMIE 4	The Board's Tranquillity Position Statement defines tranquillity as "a state of calm and quietude associated with peace, experienced in places with mainly natural features	The Applicant notes this comment and is intending on submitting an updated Tranquillity Assessment at Deadline 5.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			and / or historic character, free from man-made noise and other aural and visual disturbance". We consider that comprehensively assessing impacts on tranquillity is more nuanced than the approach that has been taken by the Applicant and we agree with Wiltshire Council's view that relying on the results of standardised noise modelling fails "to capture experiential and cumulative effects on residents and visitors within a high-sensitivity rural landscape" (paragraph 2.8, REP1-138). This is recognised within our Tranquillity Position Statement: "There are a number of components to tranquillity, some of which are harder to measure than others. For example, the components of tranquillity relating to the 'state' of the 'recipient' are not readily measurable, whereas other components, such as noise levels, are. This makes tranquillity a	

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			particularly difficult factor to assess and measure" (Paragraph 4.1).	
CNL-014	Landscape and Visual Noise and Vibration	PMIE 4	Tranquillity is therefore described not as a characteristic of the environment itself, but as a 'state of mind'; a perception by the observer. The presence or absence of factors influencing tranquillity must therefore be considered against people's experience of these factors. The Landscape Institute's Technical Information Note 01/2017 on Tranquillity states that "human perceptions as well as factual evidence must be considered in any studies relating to the term".	The Applicant notes this comment and is intending on submitting an updated Tranquillity Assessment at Deadline 5.
CNL-015	Landscape and Visual	PMIE 4	Table 2-1 of the Applicant's Tranquillity Technical Note (PDA-010) outlines their assessment of the effects of the Scheme upon the CNL's Special Qualities, an assessment that has been made principally in visual terms. For Special Quality 9 – Tranquillity, the conclusion is that	The Applicant notes this comment.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			'Tranquillity remains intact for the CNL, with only negligible-minor localised change persisting at a few viewpoints within the setting of the CNL. Long term effect: Negligible-Minor adverse (localised)'.	
CNL-016	Landscape and Visual	PMIE 4	We do not agree with this conclusion. In the Board's view, routing the volume of construction traffic anticipated by the Applicant through the CNL is likely to have a significant adverse effect on its tranquillity, particularly as perceived by an observer when compared to the current baseline condition.	The Applicant notes this comment.
CNL-017	Landscape and Visual Transport and Access Noise and Vibration	PMIE 4	Notwithstanding the above comments regarding the inherent qualitative and subjective nature of comprehensively assessing impacts upon tranquillity, Section 4.5 of the Board's Tranquillity Position Statement discusses how increased vehicle movements have the potential to have a significant adverse impact on the tranquillity of	The Applicant notes this comment and is intending on submitting an updated Tranquillity Assessment at Deadline 5.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			the AONB, for example, because of noise and visual disturbance. Therefore, quantitatively assessing the likely traffic levels and vehicle movements resulting from a proposed development is a key component, but not necessarily the only key component, in assessing potential impacts on tranquillity.	
CNL-018	Transport and Access	PMIE 4	The Institute of Environmental Assessment's 'Guidelines for the Environmental Assessment of Road Traffic' recommends using two 'rules of thumb' for identifying the scale at which increases in traffic movements should be considered in an Environmental Impact Assessment (EIA). Rule 1: Where traffic flows will increase by more than 30% (or the number of heavy goods vehicles	In transport terms it was agreed that the route through the CNL from the A46 to and including Alderton Road to the north-west of Grittleton is of 'Medium' sensitivity as set out at paragraph 20 in Appendix A **Wiltshire Council's Relevant Representation [RR-4934]**. The Applicant can confirm that the guidelines were followed when undertaking the ES assessment. The methodology used is set out in Section 13.6 in **ES Volume 1**

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			(HGVs) will increase by more than 30%). Rule 2: Any other sensitive areas where traffic flows have increased by 10% or more.	**Chapter 13: Transport and Access (Rev 3) [REP3-019].**
CNL-019	Transport and Access	PMIE 4	AONBs are specifically identified as 'sensitive areas' in the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. As such, Rule 2 should be applied in the Cotswolds AONB and should relate to both traffic flows and HGV numbers. On this basis, it can be argued that an increase in traffic flows - or HGV numbers - of more than 10% is likely to be significant and have an adverse impact on the tranquillity of the Cotswolds AONB.	The Applicant can confirm that rule 2 was applied to any links with high sensitivity where flows exceeded a 10% increase. The CNL highway links were allocated a medium sensitivity. However, as set out in Table 13-25 in **ES Volume 1 Chapter 13: Transport and Access (Rev 3) [REP3-019]** all the construction routes highway links in the CNL (except for the M4 and A46) were taken forward for further assessment due to the increase in HGV numbers and concluded no significant transport impacts. The Applicant notes this comment and is intending on submitting an updated Tranquillity Assessment at Deadline 5.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
CNL-020	Transport and Access	PMIE 4	Table 13.24 of the ES shows that total vehicle numbers along much of the 20km route from M4 J18 (i.e. the B4040 (11% change), the Road West of Grittleton (27.9% change), Alderton Road (19.7% change) and the Fosse Way (29.1% change)) would breach the 10% rule of thumb. The latter three sections which experience the greatest increases are the parts of the route which currently exhibit greatest levels of tranquillity.	As set out in Table 13-25 in **ES Volume 1 Chapter 13: Transport and Access (Rev 3) [REP3-019]** all the construction routes highway links in the CNL (except for the M4 and A46) were taken forward for further assessment due to the increase in HGV numbers and concluded no significant transport impacts. The Applicant notes this comment and is intending on submitting an updated Tranquillity Assessment at Deadline 5.
CNL-021	Transport and Access	PMIE 4	Additionally, Table 13.25 of the ES shows that the number of HGVs would breach the 30% rule of thumb for the entire route, save for the short stretch of the A46 from M4 J18 to the junction with the B4040. The B4040 would see a 68.5% increase in HGV traffic, the B4039 a 75.8% increase, the minor road west of Grittleton a 102.0% increase, Alderton Road a	As set out in Table 13-25 in **ES Volume 1 Chapter 13: Transport and Access (Rev 3) [REP3-019]** all the construction routes highway links in the CNL (except for the M4 and A46) were taken forward for further assessment due to the increase in HGV numbers and concluded no significant transport impacts.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			250% increase and the Fosse Way a 238.1% increase.	The Applicant notes this comment and is intending on submitting an updated Tranquillity Assessment at Deadline 5.
CNL-022	Transport and Access	PMIE 4	The Board notes that these estimates are disputed by objectors including Stop Lime Down, whose transport consultants have estimated that HGV movements may be significantly higher than those anticipated by the Applicant. The validity of the Applicant's estimates in the ES will undoubtedly be considered in greater detail through the DCO Examination.	The Applicant makes note of this comment. Further clarification on trip generation calculations is being provided to Stop Lime Down in response the request of the Examining Authority at ISH3.
CNL-023	Transport and Access		Regardless, even the Applicant's lower estimates are significantly more than both 'rules of thumb' for HGVs and the Rule 2 for sensitive areas for total traffic flows. As such the Scheme does not accord with the Board's guidance and by extension Policy CE5 of the	As set out in Table 13-25 in **ES Volume 1 Chapter 13: Transport and Access (Rev 3) [REP3-019]** all the construction routes highway links in the CNL (except for the M4 and A46) were taken forward for further assessment due to the increase in

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			CNL Management Plan and also Policy 51 of the Wiltshire Core Strategy.	HGV numbers and concluded no significant transport impacts. The Applicant notes this comment and is intending on submitting an updated Tranquillity Assessment at Deadline 5.
CNL-024	Landscape and Visual	PMIE 4	As outlined above the overall impact on the CNL's tranquillity also encompasses the Scheme's visual impact and impact upon landscape character as well as noise and other disturbance. This particularly concerns the visual impact and impact upon landscape character of the construction and decommissioning traffic.	The Applicant notes this comment.
CNL-025	Transport and Access Socio-Economics, Recreation and Tourism	PMIE 4	The Board's Planning Officer has driven the proposed construction routes and considers that the landscapes through which the Primary Construction Route passes are typical of this part of the CNL and display several of its other special qualities including 'big skies and	With specific regard to promoted routes affected by the Primary Construction Route, these have been individually assessed in **ES Volume 3, Appendix 16-2 Tourism and Recreation Receptor Tables [APP-241]**.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			long-distance views' and 'distinctive dry-stone walls'. It is also largely a tranquil route, particularly travelling along the minor roads once having left the B4039. These routes are used by pedestrians, cyclists and horses as well as vehicles. In addition to the CNL designation, it is also noted that the Primary Construction Route is crossed by the Macmillan Way promoted route at Burton and part of the Primary Construction Route, between Grittleton and the Site, is shared with the Wiltshire Cycleway.	The Macmillan Way crosses the B4039 between Burton and The Gibb, and is the only location where direct interactions with the Scheme are anticipated. This is at a location where recreational users must cross a road used by HGVs and coaches (noting the Coachstyle Ltd. depot next to the crossing point) albeit where the speed limit is 30 mph. The addition of HGV traffic associated with the Scheme is anticipated to have a negligible impact to users of the Macmillan Way as increased HGV movements will not substantially change the character of this road crossing. As such, no significant effect is anticipated during construction. The Wiltshire Cycleway runs adjacent to Lime Down B, Lime Down C, concurrently with the Primary Construction Route from Ladyswood to Grittleton, and

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				parallel to the Cable Route Corridor as far as Lanhill. As such, visual impacts and HGV impacts on users of the Wiltshire Cycleway have been assessed, resulting in a significant effect (moderate adverse) during construction and decommissioning.
CNL-026	Transport and Access	PMIE 4	The Board considers that construction traffic of the levels described above travelling along the proposed route through the CNL is likely to result in significant direct adverse effects on the CNL in respect of impacts on landscape character and visual qualities as well as tranquillity. Due to the nature of the route and the type of vehicles involved, particularly HGVs and AILs, the Board considers that construction traffic is highly likely to cause physical damage to, and / or lead to the temporary and / or permanent loss of roadside landscape elements such as	The following should be noted: -All highway links in the CNL are already used by HGV traffic as observed in the traffic surveys. For example, a Network Rail compound and works along Fosse way currently being undertaken lasting for six months and generating 19 HGV's in one hour along Alderton Road; -There are no existing HGV restrictions on any of the CNL links; -construction is temporary; -works are temporary;

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			overhanging trees, hedges, verges, banks, and ditches and possibly damage structures such as walls and bridges. This would conflict with Sections 9.14 and 11.13 of the Cotswolds AONB Landscape Strategy & Guidelines, and by extension Policies CE1 and CE13 of the CNL Management Plan, Policy 51 of the Wiltshire Core Strategy and paragraph 189 of the NPPF.	-no access junctions are proposed in the CNL; -the proposed road widening is all in verge only; -the **Outline CTMP [REP3-108]** commits to provide conservation kerbs at any widening points; and -the **Outline CTMP [REP3-108]** commits to conditions surveys to correct damage to the road network caused by construction vehicle's. The Applicant is intending on submitting an updated Tranquillity Assessment at Deadline 5.
CNL-027	Landscape and Visual Transport and Access	PMIE 4	In conclusion, and notwithstanding the mitigation measures proposed by the Applicant to address the impacts of construction and decommissioning traffic, the Board considers that by routing this significant amount of	The Applicant will undertake a Tranquillity Assessment for Deadline 5 to assess the landscape and visual effects of the construction traffic through the CNL

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			traffic through the CNL, the Scheme would give rise to a ***direct, major/moderate (significant) adverse*** effect on the tranquillity of the CNL, one of its special qualities. Whilst it is acknowledged that in EIA terms, this impact would be 'temporary' (i.e. not permanent), it would still last for several years and for its duration, the impact would be significant, direct and adverse.	in relation to Special Quality- Tranquility. The Applicant refers to the Cotswolds Conservation Board Position Statement on Tranquillity which states on page 1: "*This Position Statement is not targeted at temporary - and / or infrequent - workday noise, especially for such noise associated with rural land management, rural skills and / or conservation management*." and "*Whilst some level of noise and other aural and visual disturbance from development is inevitable, especially during construction phases, adverse impacts on tranquillity should be avoided and minimised as far as possible and, ideally, reduced.*"

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
CNL-028	Transport and Access	PMIE 4	Ultimately, if the alternative routes for this construction traffic that are located outside of the CNL are deemed unsuitable due to highways constraints and consequently, the only way to reach the construction locations is to route traffic for a significant distance (c.20km) through the CNL causing significant adverse impacts on its tranquillity for the length of the construction and decommissioning periods, the Board considers the project has not been sensitively designed and would question whether fundamentally the Site is the correct location for a development of this nature and scale.	The installation of cable within the Cable Route Corridor would require up to approximately 18 months, and the construction of the Solar PV Sites would require an estimated 24 months. Decommissioning is expected to take between 12 and 24 months and will be undertaken in phases. Alternative construction traffic routes to avoid the CNL have been explored and discounted, as set out in the **Construction Routes in the Cotswolds National Landscape Technical Note [REP1-131]**. Regarding site selection generally, the Applicant has assessed a number of alternative sites away from the CNL as set out in the **Site Selection Assessment Report [APP-185]** and the **Technical Note on Site Selection Assessment [REP2-043]**. However, the assessment identified no more

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				suitable and available locations within the 20km search area than the proposed location for the Scheme, based on the criteria identified.
CNL-029	Transport and Access	PMIE 4	The Board maintains our position that routing construction traffic through the CNL conflicts with Policies CE1, CE5 and CE13 of the CNL Management Plan and by extension Policy 51 of the Wiltshire Core Strategy, paragraph 189 of the NPPF and NPS EN-1.	The Applicant is intending on submitting an updated Tranquillity Assessment at Deadline 5.
CNL-030	Landscape and Visual Transport and Access Noise and Vibration Socio-Economics, Recreation and Tourism	PMIE 4	The Board considers that PMIE 4 remains unresolved.	The Applicant notes this comment. Table 3.1 (Ref 3.1.22) in **Statement of Common Ground with Cotswolds National Landscape Board [REP2-029]** confirms that these outstanding matters remain Under Discussion with the Cotswold National Landscape Board.
CNL-031	Landscape and Visual	PMIE 6	This PMIE concerns the nature and scale of visual effects of Site C of the Scheme on receptors located on	Reference to 3.1.17 of the draft Statement of Common Ground with the Cotswolds National Landscape

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			Alderton Road which forms the boundary with the CNL. The Board had previously recommended the potential removal of panels from fields C7 and C9 pending the results of further assessment. As such the Board notes the Applicant's position as outlined within the draft Statement of Common Ground with the Board (May 2026, Revision 1, REP2-029) at Reference 3.1.17 (page 14): *"The final iteration of the Scheme includes the avoidance of panels in the southern part of Field A1, the remainder of Field C6 and Fields C7. These areas are identified for habitat enhancement…. Discussions are ongoing surrounding panels in C9."*	Board (May 2026, Revision 1, REP2-029) refers to a matter under discussion and includes typographical errors and should have read as follows: *"The final iteration of the Scheme includes the avoidance of panels in the* ***northern*** *part of Field A1, the remainder of Field C6 and C8".* As noted, these areas are identified for habitat enhancement". Solar infrastructure in Field C7 was tested through the production of Sections (submitted into the Examination as Annex F in response to the Examiners Question LV1.11 [REP3-128]). It is noted that "*The CNLB support the decision to remove Solar PV Panels in the remainder of Field C6 and note field C7 has been tested through sections to show that visibility would be limited"* (Ref 3.1.19 of the Statement of Common Ground with Cotswolds

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				National Landscape Board [REP2-029]).
CNL-032		PMIE 6	The Board understands from a voicemail message left for its Planning Officer by the Applicant on 18 May 2026 that, following discussions at the meeting on between the Applicant and the Board on 30th March 2026, the Applicant is willing to remove Solar PV panels from the remainder of Field C9 if a formal request is made by the Board to the Examining Authority. The Board's Planning Officer confirmed via email to the Applicant on 28 May 2026 that this request would be made. Therefore, the Board requests that panels should be removed from the remainder of Field C9 to minimise the impact of the Scheme on views from the CNL.	The Applicant confirms Solar PV Infrastructure has been removed from Lime Down Field C9 in response to CNL Board feedback. Refer to Change Notification [REP3-134].
CNL-033		PMIE 6	If the Applicant maintains the above position and if the above changes	In consideration of the typographical errors outlined in CNL-031 above,

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			are reflected in the final detailed design and DCO, the Board considers PMIE 6 is capable of being resolved.	matters relating to the southern part of Field A1 and Field C7 remain under discussion. The remainder of Field C6 was removed from the scheme prior to the submission of the DCO Application.
CNL-034		PMIE 1	This overarching PMIE essentially comprises the Board's overall assessment of the impacts of the Scheme on the CNL and its setting and whether, overall, the Scheme has sought to further the purpose of CNL designation.	The Applicant notes this comment and has provided. responses to specific comments received in the relevant rows below. The **Statement of Common Ground with Cotswolds National Landscape Board [REP2-029]** confirms that this matter remains Under Discussion with the CNL.
CNL-035		PMIE 1	In accordance with EIA Regulations, the mitigation hierarchy used in the Project is i) to prevent/ avoid, ii) to mitigate and restore and iii) finally offset or, failing that, compensate to	The Applicant confirms that this reflects the mitigation hierarchy applied for the Scheme in Section 6.6 of **ES Volume 1,**

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			reduce development impacts and control any negative effects on the environment.	**Chapter 6: EIA Methodology [APP-058]**.
CNL-036		PMIE 1	*Avoidance measures* The Board acknowledges and supports the avoidance measures incorporated into the Scheme which have been introduced with the aim of reducing development impacts and controlling any negative effects on the CNL and its setting. These measures include: 1. Avoiding development adjacent to the National Landscape where it would affect its setting; and 2. Avoiding development where it would be visually intrusive and affect the character and visual experience of the landscape.	The Applicant confirms that this reflects the measures applied to the Scheme in Paragraph 8.9.4 of **ES Volume 1, Chapter 8: Landscape and Visual [REP3-025]**. The Applicant confirms that Fields C2, C3, and C4 were removed entirely from the Order Limits following statutory consultation to minimise impacts to the CNL. Solar PV Panels have also not been positioned within Fields A11, A12, B12, C1, the northern half of Field A1, the western half of Field C9, and the majority of Field C10 (with the exception of an area in the north) to further minimise impacts to the CNL. Areas of proposed Solar PV Panels are presented in **ES Volume 2, Figure 3-4-1 to 3-4-5.2: Landscape and**

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			The Board understands that this has led to the removal of Solar PV panels from fields A1, A11, A12, B12, C1, C2, C3, C4, C6, C7, C8, C9 and the majority of C10.	**Ecology Mitigation Plan [REP1-029, REP1-030, REP3-037, REP1-032]**. Solar PV Infrastructure has been removed from Lime Down Field C9 in response to CNL Board feedback. Refer to Change Notification **[REP3-134].**
CNL-037		PMIE 1	*Mitigation measures* The Board understands that the Scheme's embedded mitigation measures principally comprise a range of offsets and buffers and specific landscape design parameters outlined in Tables 7 and 8 of ES Volume 3, Appendix 8-6 [APP-197] and include the retention and enhancement of the existing landscape framework to gap up existing hedgerows and provide new tree lines to increase age and species diversity. The embedded mitigation also includes new planting	The Applicant confirms that this is an accurate description of the Mitigation measures embedded within the Scheme. However, please note minor changes to Appendix 8-6 have been made in **ES Volume 3 Appendix 8-6 Assessment of Effects on the Cotswolds National Landscape and it's Special Qualities (Change Application) (Rev 1) (Clean) [CR1-034].**

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			to both mitigate the visual effects of the Scheme and provide landscape benefits to counteract harm. This includes the re-establishment of historic hedgerows within the setting of the CNL, new areas of native woodland, trees, scrub and grassland, new planting within riparian corridors to enhance rivers and wetland, as well the restoration of dry-stone walls and creation of new ponds.	
CNL-038		PMIE 1	*Enhancement measures* Enhancement measures are discussed between paragraphs 2.3.17 and 2.3.21 of ES Appendix 8.6 (Assessment of Effects on the Cotswolds National Landscape and its Special Qualities). The Board considers enhancement measures to be measures which demonstrably add value to the host landscape, which in this case forms the setting of the CNL, creating a positive change above its baseline condition.	In response to the Examiners Authority's First Written Questions at LV1.1 **[REP3-128]** the Applicant has clarified and quantified the difference between Embedded mitigation and enhancement measures. It is noted in Paragraph 4.35 of GLIVIA3 that enhancement is not a requirement of the EIA regulations. However, due to the Schemes location on the edge of the CNL avoidance measures have been

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			They are separate from mitigation measures.	incorporated into the Scheme Design as part of the Mitigation Hierarchy as set out in Section 8.9 of the LVIA. This includes: • Avoiding development adjacent to the National Landscape where it would affect its setting; and • Avoiding development where it would be visually intrusive and affect the character and visual experience of the landscape. There were 3 options relating to the how to manage these land parcels. These include: Option 1 - to remove the entire field from the Scheme; Option 2 - to maintain hedgerows within the red line boundary and remove the field; or Option 3 - to retain the whole parcel within the Scheme.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Option 3 was applied to Site A: The northern part of A1, A11 and A12; Site B: B12; and Site C: C1, C6, C8, part of C9 and the majority of C10. These fields, within the setting of the CNL, provide opportunities for positive enhancement (including new hedgerows and wildflower meadows) to further the purposes of CNL. In Response to Questions 1-4 of LV1.1 **[REP3-128]** the Applicant has provided a tabulated response to Questions 1-4 attached as Appendix LV1-1 (Annex C). This includes a plan of the enhancement measures on the edge of the CNL. Table 4 shows the extent of proposed planting that would be for enhancement only. This includes: • 104.80 ha of Proposed Ground Cover

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				• 7.32 km of Hedgerow Reinforcement and Roadside Reinforcement • 0.39 km of Proposed Native Hedgerows; • 8 Reintroduction of Historic Ponds
CNL-039		PMIE 1	Several of these measures are outlined at paragraph 2.3.19, however these are described by the Applicant as *"embedded mitigation measures"* and thus the Board does not consider these to comprise 'enhancement'.	Please refer to the Applicant's response above at CNL-038. .
CNL-040		PMIE 1	The Applicant outlines specific enhancement measures at paragraphs 2.3.20 and 2.3.21 of ES Appendix 8.6: 1. **The creation of wildflower meadows on the edge of the CNL within the northern part of A1, C1, C6, C8, the**	The Applicant welcomes the CNL Board's acknowledgement of the enhancement measures on the edge of the CNL. However, please refer to the Applicant's response above at CNL-038 for further details and quantities of these enhancement measures.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			southwestern part of C9 and B12: The Board considers that the change within these fields from arable to wildflower meadows is an enhancement in landscape and visual and biodiversity terms and it would also contribute to preventing soil loss. It reflects the aspirations of the Cotswolds Nature Recovery Strategy and as such is supported. 2. **The inclusion of wildflower meadow verges on the edge of set aside land in A11, A12 and C10 to provide attractive buffers in views from public roads:** This is also considered an enhancement, albeit minor in scale, given it only applies to relatively short stretches of verge when considering the overall scale of the Scheme.	With reference to bullet 3- Maintaining hedgerows at their current height, the Applicant accepts that this is not a specific enhancement measure but rather a key management objective specific to the edge of the CNL to maintain views, as noted by the CNL Board. Please refer to the Applicant's response to LV1.3 of the Examiners Authority's First Written Questions [REP3-128] for further details relating to hedgerow heights. .

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			3. **Maintaining hedgerows at their current height of c1.5m (or as existing if greater) bordering the CNL within Site C (including the northern boundary of C1 to maintain open views of the landscape within the setting of the CNL:** The Board does not consider maintaining current hedgerow heights to be an enhancement. The Board notes that the Applicant now agrees with this position in the Applicant's Response to Relevant Representations (PDA-009, comment at CNL-064, page 588).	
CNL-041		PMIE 1	As discussed above in relation to PMIE 4, the Board considers that there would be ***direct, significant adverse*** effects to landscape character and visual quality along the construction route, including where it runs through the	The Applicant notes this comment.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			CNL and its setting. The following comments relate to the effects of the proposed development of Sites A, B and C on the landscape character and visual quality of the CNL and its setting.	
CNL-042		PMIE 1	*Residual landscape character effects (Sites A, B and C)* Aside from the direct effects of the construction and decommissioning traffic discussed above, there would be no direct physical change to the character of the CNL, as the Scheme is not within the CNL. However, there would be perceptual changes to the character of the CNL where it is in close proximity to the Scheme, assessed within the Application as the '1km Local Study area'. There would also be a direct physical change to the character of this land that forms the setting of the CNL; a small proportion (including land closest to the CNL's boundary) will change from arable to wildflower	The Applicant welcomes the acknowledgement that there are no direct effects to landscape character within the CNL and the direct perceptual changes described within the setting of the CNL are acknowledged as enhancements. The Applicant would like to refer to Paragraph 2.4.6 of Appendix 8-6 **[APP-197]** which states: "*The significant effects within the 1 km local study area as shown above are primarily related to the change in land use from agriculture to the solar farm. This change does not directly affect the CNL as the buffer to the development provided by the*

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			meadow or set aside whilst a much greater proportion would be covered in Solar PV panels for the duration of the Development.	*avoidance measures contains the development away from the edge of the CNL. As such, the development would be barely discernible from within the CNL. Harm to the CNL itself would be minimal with beneficial effects in the long term which further the purposes of the designation*." The Applicant will be providing additional Landscape Character Assessments as requested by the ExA at ISH2 at deadline 5. Please refer to the Annex E LV1.9 – Spatial Extent of the Setting of the Cotswold National Landscape **[REP3-128]** for the Applicant's definition of the setting of the CNL as requested by the ExA.
CNL-043		PMIE 1	Notwithstanding the proposed avoidance, mitigation and enhancement measures, the Board	Please refer to the Applicant's response to CNL-042 above regarding the assessment of

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			notes that the Applicant identifies at Section 2.4 of Appendix 8-6 that the proposal would give rise to a ***direct, significant adverse*** effect upon the landscape character of the Site, and therefore the setting of the CNL as well as an ***indirect, significant adverse*** effect within the 1 km local study area, including land within the CNL. This would be experienced throughout the Scheme's operational lifetime, thus constituting a long-term effect.	effects on landscape character within the 1km Study Area.
CNL-044		PMIE 1	In their response to Relevant Representations (Part 1) (PDA-009), the Applicant states "*It is fully acknowledged that the character of the Site itself, and its immediate surroundings would be Significantly Adversely affected, with the land now presenting as a large-scale solar scheme. However, the avoidance measures along the boundary of the CNL limit the extent of the visual effect of the Scheme on*	The Applicant notes this comment.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			the CNL's character and scenic qualities. At the point the Scheme is decommissioned the landscape proposals would provide the long-term legacy landscape benefits as set out within ES Volume 1, Chapter 8: Landscape and Visual [APP-060]".	
CNL-045		PMIE 1	The Board considers that whilst the avoidance and mitigation measures would, to a small extent, reduce the effect of the Scheme on the landscape character of the CNL and its setting, the Scheme will still have a significant harmful impact on landscape character for both the Site itself and the CNL due to its contrasting nature with the existing baseline situation.	The Applicant considers that the avoidance measures on both the edge of the CNL and where significant visual effects were identified (leading to the removal of panels in Fields C2, C3 and C4) have reduced the level of landscape and visual effects within the setting of the CNL to non-significant levels. Please refer to the Annex E LV1.9 – Spatial Extent of the Setting of the Cotswold National Landscape **[REP3-128]** for the Applicant's definition of the setting of the CNL as requested by the ExA.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
CNL-046		PMIE 1	We do not agree with the LVIA's conclusion that by Year 15 of operation, by which time it assumes that the proposed planting would have become established / fully effective, there would be '*beneficial landscape effects within the setting of the CNL in the long term which would further the purposes of the designation'.* However, post decommissioning, following the removal of all introduced above ground energy infrastructure components and restoration of the land back to farming land use or alternative appropriate agri environment use(s), there could be slight positive impact for landscape character if the embedded character supporting mitigation and planting enhancement measures are retained at the end of decommissioning phases as a positive landscape legacy of the	To clarify the conclusions in Appendix 8-6, there would be beneficial effects to the fabric of the landscape throughout the scheme at Year 15 of operation as a result of the embedded mitigation and enhancement measures. The mitigation measures would reduce the level of effects on visual receptors and landscape character from Significant to non significant levels by Year 15. The enhancement measures which are predominantly on the boundary of the CNL boundary would be beneficial at the Site level (in the long term (Year 15 and beyond) and would provide a positive landscape legacy for the project whilst also furthering the purposes of the CNL designation. With reference to CNL-040, these benefits are agreed by the Board.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			project. In this respect it would be useful for the Applicant to provide photomontages and/or aerial photography (i.e. updated Google Earth images) of the legacy landscape at Year 60 with and without panels and associated infrastructure.	
CNL-047		PMIE 1	*Residual visual effects (Sites A, B and C)* The Board welcomes the Applicant's engagement on the Scheme to date, particularly in removing Solar PV panels from fields adjacent or close to the CNL's boundaries where development would clearly have had a significant adverse effect views to and from the CNL. The Board acknowledges that this avoidance combined with mitigative screening should ensure that there would be limited to no visibility of the scheme	The Applicant notes this comment.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			from several viewpoints either within the CNL or on its boundary. However, the Applicant identifies that at several public and private viewpoints within the CNL's setting, receptors would experience **significant adverse visual effects**, particularly for the first 15 years of operation, some of which may, in the Board's view, continue for the duration of operation, particularly during winter months.	
CNL-048		PMIE 1	As all the below are at least moderate in magnitude, they are considered significant for the purpose of the Examination. • ***Major/moderate adverse*** effect for receptors at viewpoint 18 at construction and Year 1-15 - Receptor	Although these receptors were identified in Tables 10, 11 and 12 in Appendix 8- 6. as extracted from ES Volume 3, Appendices 8-3-2-1-2: Visual Assessment Sheets of Private Receptors (Non-Significant) and 8-3-2 2-2: Visual Assessment Sheets of Private Receptors (Significant), the text in paragraphs 2.4.7 to 2.4.19 of

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			TP037: Users of Footpath WT|NORT|1; • ***Moderate adverse effect*** for receptors at Alderton Road, Luckington (T R038) which follows the CNL boundary to Site C, though this would be reduced pending the changes discussed at PMIE 6; • ***Moderate adverse effect*** for receptors at TR043 at construction and Year 1-15 for Receptor - TR043: Users of Ford Road and Widleys Road Junction East to Bottom of Bustlers Hill, Sherston represented by VP 6; • ***Moderate adverse effect*** for receptors at TR143 at construction and Year 1-15 - Receptor TR143; Users of Commonwood Lane;	Appendix 8-6 explains the context of these effects within the setting of the CNL. Noting that the visual assessment is receptor based as opposed to Viewpoint based, this context is set out below for each receptor. **For Receptor TP037: Users of Footpath WT|NORT|1**. This footpath connects from Foxley Road on the edge of the CNL to Honey Lane to the southwest. Although not in the CNL itself, there is a visual relationship between the footpath and the CNL at its northern end. Although the assessment identifies Moderate Adverse effects on the footpath during Construction, these effects are as a result of the development on the southwestern end of the Footpath, close to Honey Lane. There is no infrastructure proposed in B12 and there would be no change in views to and from the CNL

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			• ***Moderate adverse effect*** for receptors at TR145 at construction and Year 1-15 Receptor TR145: Users of Fosse Way; • ***Moderate adverse effect*** for receptors at TR154 at construction and Year 1-15 Receptor TR154 Users of Road Junction at Southfields South East to Y Junction, Sherston Lane.	from the footpath at its northern end. As such, there are no significant effects on Public Receptors associated with the Scheme and the CNL. This is as a result of the measures incorporated into the Scheme to avoid harm to the CNL. For Receptor TR038: Alderton Road, Luckington, as noted above Solar PV Infrastructure has been removed from Lime Down Field C9 in response to CNL Board feedback. Refer to Change Notification **[REP3-134].** Concern over the level of effects as a result of solar infrastructure in C7 has also been expressed and has been subject to further assessment work and visualisations. The CNL Board have confirmed in Ref 3.1.19 of the **Statement of Common Ground with Cotswolds National Landscape Board [REP2-029]**) that *"field C7 has been tested through sections to show that*

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				visibility would be limited". It is therefore concluded that apart from a glimpsed view towards Field C7 at a field entrance (Viewpoint CNL G) the net effects on users of Alderton Road are agreed to be non-significant. For the other receptors listed, the identified Moderate Adverse effects relate to Construction and Year 1 Operaation. The proposed mitigation will reduce the effects to non-significant levels by Year 15.
		PMIE 1	Whilst the enhancement measures are noted and would bring a degree of betterment for receptors in views from selected locations within the CNL, on its boundary or within the CNL's setting (when looking towards the CNL), they are relatively limited in extent and not considered to give rise to more than ***negligible to***	The Applicant politely disagrees with this comment. Although it is accepted that the proposed enhancement measures can improve visual amenity and as such be betterment, the visual effects of a development cannot be beneficial. It is the mitigation measures (and to

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			minor beneficial visual effects for receptors experiencing views to and/or from the CNL.	some extent the enhancement measures) which will reduce the identified visual effects of the Scheme to non-significant levels for most receptors located within the CNL, on its boundary or within the CNL's setting.
		PMIE 1	Therefore, the Board considers that the Scheme would give rise to a net ***direct, significant adverse*** visual effect on the CNL and its setting for at least a period during construction and the first 15 years of operation.	The Applicant acknowledges that the Scheme gives rise to some significant visual effects for a small number of receptors at Year 1 and that these will reduce over the course of 15 years as proposed mitigation planting matures. These effects are under discussion with the CNL Board. The Applicant has removed solar infrastructure from Lime Down Field C9 in response to CNL Board feedback. Refer to Change Notification **[REP3-134]**. This removes significant visual effects for users of Alderton Road (Receptor TR038).

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
		PMIE 1	*Conclusion on PMIE 1* In aiming to assist the Examining Authority in its examination of the DCO, the Board's assessment is that notwithstanding the avoidance, mitigation and enhancement measures contained within the Scheme, it would still give rise to ***significant residual adverse effects*** on the natural beauty of the CNL and its setting, including effects upon: • Its tranquillity, one of its special qualities, due to the proposed routing of construction and decommissioning traffic, in particular HGVs and AILs; • Its special qualities overall; when considered	As noted above the significant residual adverse effects are under discussion with the CNL Board. In relation to the bullet points please see Applicant's response below. A Tranquillity Statement will be prepared by the Applicant for Deadline 5. The Applicant politely disagrees that that the Scheme would give rise to net significant adverse effects on the CNL's special qualities overall. The Applicant respectfully disagrees that the Scheme would give rise to Significant Adverse effects up to year 15 on Landscape Character within the CNL and its setting. As noted previously in **Environmental Statement Volume 3 Appendix 8-6 Assessment of Effects on the Cotswolds National Landscape and it's Special Qualities (Change**

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			alongside other adverse (but not significant) effects on special qualities aside from tranquillity, there would be a net significant adverse effect on the CNL's special qualities overall; • The landscape character of the Site itself which lies within the CNL's setting and the landscape character within the 1 km local study area which includes land within the CNL. Proposed mitigation would reduce the scale of this effect by Year 15, but the Board considers adverse effects would remain significant for the duration of the development; • Its visual qualities, i.e. for receptors experiencing views to and/or from the CNL. Proposed mitigation may reduce the scale of effect, but	**Application) (Rev 1) (Clean) [CR1-034]** paragraph 2.4.6 states: "*The significant effects within the 1 km local study area as shown above are primarily related to the change in land use from agriculture to the solar farm. This change does not directly affect the CNL as the buffer to the development provided by the avoidance measures contains the development away from the edge of the CNL. As such, the development would be barely discernible from within the CNL. Harm to the CNL itself would be minimal with beneficial effects in the long term which further the purposes of the designation*. Due to the avoidance measures on the edge of the CNL, the Scheme does not rely on mitigation to reduce the effects of the Scheme on Landscape Character.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			the Scheme would give rise to a net direct significant adverse visual effect for at least the period during construction and the first 15 years of operation.	
		PMIE 1	The Board acknowledges that, due to the nature of the Scheme, these effects should be considered 'temporary', however we observe that the operational phase is still classed as 'long term', defined at paragraph 1.6.19 of LVIA Appendix 8-1 [APP-187] as being '*10-40 years (or longer)*'.	The Applicant notes this response and respectively refers to the response above.
		PMIE 1	In relation to the relevant planning policy and guidance outlined within our previous Relevant Representations (RR-0944), we consider that the Scheme conflicts with Policies CE1, CE5 and CE13 of the Cotswolds National Landscape Management Plan 2025-2030 and Sections 9.13, 9.14, 11.4, 11.12,	Given the Applicant's responses above, the Applicant considers that appropriate measures have been sought to further the purposes of the CNL by taking all reasonable steps though the avoidance measures and positive enhancement measures incorporated into the Scheme and that the Scheme is compliant with Policies CE1:

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			11.13 and 14.4 of the Cotswolds AONB Landscape Strategy and Guidelines. In turn it would also conflict with Wiltshire Core Strategy Core Policy 51 and paragraph 189 of the National Planning Policy Framework. We also consider that it does not comply with NPS EN-1, notwithstanding the NPS' caveat at Section 5.10 that virtually all NSIPs will have adverse effects on the landscape. The Board considers that whilst the Project has sought to minimise the degree of harm to the landscape, a development of this scale in this location to be constructed in the manner proposed (i.e. routing most construction traffic through the CNL) will still have a net significant adverse impact on the natural beauty of this nationally designated landscape.	Landscape, CE5: Dark Skies and CE13: Waste management and the circular economy of the Cotswolds National Landscape Management Plan 2025-2030 and the Cotswolds AONB Landscape Strategy and Guidelines for the LCT 9: High Wold Dip Slope; LCT 11: Dip-slope Lowland and LCT 14: Cornbrash Pastoral Lowlands
		PMIE 1	The Board's position on large scale solar energy proposals such as this,	The Applicant considers that as a result of the avoidance, mitigation

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			outlined at paragraph 3.4.4.13 of our Renewable Energy Position Statement is that *"For larger schemes that might be put forward, Applicants should be required to demonstrate that the scheme could be accommodated without significantly affecting the natural beauty of the CNL"*. As previously outlined within our Relevant Representations, whilst the Position Statement was principally intended to outline the Board's position regarding renewable energy proposals within the CNL, the Board considers this to be an appropriate position relating to proposals which lie within the CNL's setting and have the potential to impact the CNL.	and enhancement measures incorporated into the Scheme, e.g. the offset to solar infrastructure from the CNL boundary and its setting, the development can "*be accommodated without significantly affecting the natural beauty of the CNL".*
		PMIE 1	As such, the Board **objects** to this DCO application and recommends that consent should not be granted.	The Applicant notes this comment.
		PMIE 1	In reaching his decision in respect of this DCO application, the Secretary of State for Energy Security and Net	The Applicant notes this comment.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			Zero, as a 'relevant authority' has a statutory duty to seek to further the statutory purpose of conserving and enhancing the natural beauty of the Cotswolds National Landscape.	
		PMIE 1	DEFRA guidance referenced in our Relevant Representations (RR-0944) states that in discharging this statutory duty outlined at Section 85 of the Countryside and Rights of Way Act 2000 (as amended), relevant authorities should seek to avoid harm and contribute to the conservation and enhancement of the natural beauty, special qualities, and key characteristics of Protected Landscapes as far as is reasonably practical.	The Applicant notes this comment.
		PMIE 1	This goes beyond mitigation and like for like measures and replacement. The proposed measures to further the statutory purpose of a National Landscape should explore what is possible in	The Applicant notes this comment and refers to the CNL Board's comment below which acknowledges that the Applicant has sought to further its natural beauty through the proposed enhancement

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			addition to avoiding and mitigating the effects of the development, and should be appropriate, proportionate to the type and scale of the development and its implications for the area and effectively secured. As well as being applied within National Landscapes, the 'seek to further duty' also applies to functions undertaken outside of the designation boundary which affects land within a National Landscape, as is the case with determining this DCO application.	measures located in the setting of the CNL.
		PMIE 1	The Board acknowledges that 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 and in doing so the Board recommends that the highest status of protection should be given to the landscape and natural beauty of the CNL, as outlined at Section 5.10 of NPS EN-1.	The Applicant notes this comment.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
		PMIE 1	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 Applicant has sought to further the purposes of the CNL by taking all reasonable steps though the avoidance measures and positive enhancement measures incorporated into the Scheme.
		PMIE 1	The Board acknowledges that 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 'seek to further the purpose'. However,	The Applicant notes this comment.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			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.	
		PMIE 1	Notwithstanding the Board's conclusions on the net harm to the Cotswolds National Landscape arising from the Scheme, we consider that the Applicant has *sought to* further its natural beauty 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 comprise enhancements to the CNL's setting above and beyond the current baseline	The Applicant welcomes the CNL Board's acknowledgement that the Applicant **has *sought to* further** its natural beauty through the proposed enhancement measures located in the setting of the CNL.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			condition on land which is visually connected to, and has a complementary landscape character to, the adjacent CNL.	
		PMIE 1	However, the Board considers that PMIE 1 remains unresolved.	The Applicant notes this comment. The **Statement of Common Ground with Cotswolds National Landscape Board [REP2-029]** confirms that this matter remains Under Discussion with the CNL.
		PMIE 8	PMIE 8 relates to whether further measures to compensate for the residual adverse effects of the development on the natural beauty of the CNL and its setting are appropriate in order to discharge the statutory duty to seek to further the conservation and enhancement of its natural beauty (Section 85 of the Countryside and Rights of Way Act 2000, known as the Protected Landscapes Duty).	The Applicant notes this comment and is subject to further discussion within the SoCG.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
		PMIE 8	Without prejudice, if the Secretary of State is minded to permit this DCO application, he should provide proportionate, reasoned, and documented evidence to demonstrate how he has sought to further the purpose, not merely through mitigation of harm but by taking all reasonable steps to further the purpose. If it is not practicable or feasible to take measures to further this purpose, the Secretary of State should provide evidence to show why it is not practicable or feasible.	The Applicant notes this comment. Table 3.1 (Ref. 3.1.24) in **Statement of Common Ground with Cotswolds National Landscape Board [REP2-029]** confirms that this matter remains Under Discussion with the CNL.
		PMIE 8	As outlined above in respect of PMIE 1, we consider that the Applicant has *sought to* further the natural beauty of the CNL. Additionally, the Board also notes that in its response to the Nuclear Regulatory Review 2025 entitled 'Building our nuclear nation' published on 13 March 2026, the Government has stated: *"To address this uncertainty, we will*	The Applicant notes this comment.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			legislate to clarify that developers of Nationally Significant Infrastructure Projects are not required to pay financial compensation in order to comply with the Protected Landscapes Duty. Relevant authorities must still seek to further the purposes of Protected Landscapes, meaning that landscape and nature considerations and better environmental outcomes remain an important consideration for development in these special places".	
		PMIE 8	As such the Board does not recommend that financial compensation should be sought to comply with the Protected Landscapes Duty.	The Applicant agrees with this position and notes that this is consistent with the position from Central Government and the Secretary of States in its decision on the North Falls DCO. Please see the Applicant's Written Summary of Oral Submissions at Issue Specific Hearing 2 for further details.
		PMIE 8	However, we separately note and support Wiltshire Council's	The Applicant notes this comment and confirms that it has undertaken

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			comments regarding Public Rights of Way in its Relevant Representations (RR-4934, paragraphs 15.1 and 15.2 and 15.8 to 15.10) and agree that the development is likely to place additional pressure on the surrounding Public Rights of Way, which the public will use in greater numbers if they want to enjoy the countryside without walking amongst the panels. This includes Public Rights of Way within the CNL which may well come under further pressure, and we consider it likely that further maintenance and improvement will be required to avoid further adverse effects on recreational routes within the CNL. An accessible landscape for quiet recreation for both rural and urban users is one of the CNL's special qualities.	an additional technical note to detail likely displacement on the PROW network as a result of the Scheme. The **Technical Note on Alternative Access to the Public Rights of Way Network [EN010168/EXAM/9.44]** has been submitted at Deadline 4 in response to the question set out at GCT1.2 in the **Examining Authority's First Written Questions [PD-010]**.
			Therefore, we support the Council's request for a contribution of £20,000 per annum (index linked) towards the	Please see the **Technical Note on Alternative Access to the Public Rights of Way Network**

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			maintenance, improvement and enhancement of the Public Rights of Way network to be spent in the manner outlined at paragraphs 15.2 and 15.8-15.10 of the Council's Relevant Representations.	**[EN010168/EXAM/9.44]** provided at Deadline 4. The Applicant does not consider that additional PRoW network improvements are required in order to mitigate PRoW displacement effects and the conclusions on effects within the ES, together with the recommended mitigation, already takes into account PRoW displacement effects. However, the Applicant is committed to providing financial contributions that can be allocated towards PRoW network improvements and enhancements, for example through the Community Benefit Fund, and is discussing with Wiltshire Council what is the most appropriate mechanism for this contribution to be delivered.
		PMIE 8	We note the Applicant's statement at paragraph 5.5.1 of their Planning Statement that the Applicant *"has committed to a Community Benefit Fund (CBF). The*	The Applicant notes this comment and confirms that dialogue with Wiltshire Council's Countryside Access Team is ongoing, as documented in the

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			CBF does not form part of the DCO application and this funding is not required to mitigate the impacts of the Scheme. Therefore it cannot be taken into account in the decision making process for determining the DCO application. However, it will be available to fund local projects". Whilst we acknowledge this position and that the Council's request would potentially form only part of the CBF, we would like to suggest that a figure somewhat larger than £20,000 could be justified given the scale and potential impacts of the Scheme.	updated **Statement of Common Ground with Wiltshire Council [EN010168/EXAM/8.2]** submitted at Deadline 4. If there are specific impacts to PRoWs in the CNL that the Cotswold National Landscape Board believe have not been suitably covered, the Applicant welcomes further inputs to determine the mechanism for any additional funding (if agreed to be required between the Applicant, Wiltshire Council, and the CNL Board), can be secured.
		PMIE 8	Accordingly, the Board considers that PMIE 8 remains unresolved.	The Applicant notes this comment. Table 3.1 Reference 3.1.24 in **Statement of Common Ground with Cotswolds National Landscape Board [REP2-029]** confirms that this matter remains Under Discussion with the CNL.

3.5 Environment Agency

EA RR ID Ref in PDA-009	Issue	Topic(s)	Environment Agency Updated Position following Deadline 2 submissions	Applicant's Response
EA position on issues raised in Relevant Representation/ Written Representation responses following Deadline 2 submissions				
EA-012	REP1-008 3.1 Draft Development Consent Order (Rev 2)	Disapplying Flood Risk Activity Permits	**Under Discussion** We have now agreed in principle to the Applicant's request to disapply the need for Flood Risk Activity Permits under the Environmental Permitting (England and Wales) Regulations 2016; based on the information in REP1-126 9.10 ES Volume 3 Appendix 9-9 Watercourse Crossing Schedule and subject to the inclusion of our standard protective provisions in the Development Consent Order. We note there are some amendments to our standard protective provisions in the draft Development Consent Order REP1-008 EN010168-	The Applicant confirms that the Environment Agency's standard protective provisions were included at Part 7 of Schedule 15 to the **Draft DCO [REP3-005]** submitted at Deadline 3.

			001285-3.1 Draft Development Consent Order (Rev 2) Tracked.pdf Our standard protective provisions have been robustly reviewed and they are fit for purpose. Therefore, we do not agree to the proposed changes.	
EA-013	REP1-008 3.1 Draft Development Consent Order (Rev 2) plan (CEMP)	Requirement 13 Construction environmental management	**Under Discussion** - document has not been updated to include the Environment Agency as a consultee.	The Applicant confirms that Requirement 13 of Schedule 2 to the **Draft DCO [REP3-005]** has been updated to include the Environment Agency as a consultee at Deadline 3.
EA-014	REP1-008 3.1 Draft Development Consent Order (Rev 2)	Requirement 14 Operational environmental management plan (OEMP)	**Under Discussion** - document has not been updated to include the Environment Agency as a consultee.	The Applicant confirms that Requirement 14 of Schedule 2 to the **Draft DCO [REP3-005]** has been updated to include the Environment Agency as a consultee at Deadline 3.
EA-015	REP1-008 3.1 Draft Development Consent Order (Rev 2)	Requirement 17 Soil Management	**Agreed** - As per Deadline 2 response.	The Applicant notes this issue is agreed.

EA-016	Fisheries	Fish species protection	**Agreed** - As per Deadline 2 response.	The Applicant notes this issue is agreed.
EA-017	Fisheries, Biodiversity and Geomorphology	Watercourse Crossings	**Agreed** - As per Deadline 2 response.	The Applicant notes this issue is agreed.
EA-018	Fisheries, Biodiversity and Geomorphology	Commitments register: mitigation	**Agreed** - As per Deadline 2 response.	The Applicant notes this issue is agreed.
EA-019	Fisheries, Biodiversity and Geomorphology	Ecological assessments	**Agreed** - As per Deadline 2 response.	The Applicant notes this issue is agreed.
EA-020	Fisheries, Biodiversity and Geomorphology	Aquatic invertebrates	**Agree** - As per Deadline 2 response.	The Applicant notes this issue is agreed.
EA-021	Fisheries, Biodiversity and Geomorphology	Watercourse buffers	**Under Discussion** We note the differences in watercourse buffers but would prefer to see at least a 10 metre buffer. There is a discrepancy in watercourse buffer distances where staff are to wash plant and vehicles as a biosecurity measures. Table 5 (oCEMP) states the minimum b	The Applicant notes the Environment Agency's comment. The Applicant confirms that the Scheme does not apply a single minimum 10 m buffer to all watercourses and ditches. Different buffers are applied to different features and activities, based on the sensitivity of the receptor, the function of the watercourse or ditch, and the relevant construction, ecological or regulatory context.

			uffer is 10m whereas Section 15.3.1 (**Outline Ecological Protection and Mitigation Strategy REP1-106**) states the minimum buffer is 15m. There is inconsistency in **REP1-018 6.1 ES Volume 1 Chapter 11 Hydrology, Flood Risk and Drainage (Rev 2)** Table 11-2 says "Following consultation with the Environment Agency, a precautionary 10 m stand-off will be applied", however section 11.9.2 on page 42 still says "Eight metre buffers from infrastructure will be established around watercourses". Additionally, **APP-283 Outline Landscape and Ecological Management Plan (OLEMP)** has not been updated.	An 8 m buffer is retained for lower sensitivity ditches and watercourses where no higher sensitivity criteria are triggered. This also aligns with the Environment Agency's flood risk activity permitting threshold for activities within 8 m of the bank of a non-tidal Main River, flood defence structure or culvert, where relevant. Where higher sensitivity features are present, larger buffers are applied. This includes 10 m buffers where specified in the ecological buffer criteria, and 15 m buffers for more sensitive habitats or where required for specific activities. For the specific biosecurity measure relating to staff, plant and vehicle washdown, the Applicant will retain the more precautionary 15 m stand-off set out in **Outline Ecological Protection and Mitigation Strategy [REP3-102]**. The **Outline CEMP [REP3-092]** will be reviewed and updated where required so this activity-specific stand-off is consistently reflected. The relevant Application documents, including **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP3-015]** and **Outline LEMP [REP3-100]**, will also be reviewed and updated where required to clarify that the 8 m, 10 m and 15 m buffers apply to

				different features and activities. This is a document consistency update and does not alter the conclusions of the hydrology, flood risk, fisheries, biodiversity or geomorphology assessments.
EA-022	Water Framework Directive	Groundwater Bodies	**Under Discussion** Resolved in principle. The Applicant has noted our comment and will update the **Water Framework Directive Assessment [REP1-094]** and signposting within the ES to ensure WFD groundwater bodies are clearly identified as receptors and consistently presented. We await this update.	The Applicant has created a plan showing the WFD groundwater bodies in the context of the scheme order limits and this will be provided
EA-023	Groundwater and Contaminated Land	Piling	**Under Discussion** Resolved in principle. The **BESS and Substation – Preliminary Geotechnical Risk Register [REP1-128]** was submitted at Deadline 1 to provide further information relating to possible risks posed by interactions between planned foundations and sensitive groundwater. Additionally, a full Piling Risk	Appropriate updates to all documents have now been made, future submissions of **6.1 ES Volume 1 Chapter 19 Ground Conditions (Rev 2) (Tracked) [REP1-028]** will include the correct reference for the **BESS and Substation – Preliminary Geotechnical Risk Register [REP3-125]**.

			Assessment, in line with appropriate guidance on assessing risks from foundation design, is secured via the **Outline Construction Environmental Management Plan [REP1-096]** and will be supported by ground investigation to be undertaken prior to the construction phase. We have reviewed the **BESS and Substation – Preliminary Geotechnical Risk Register [REP1-128]** and it satisfies our previous concerns. However, the reference EN010168/EXAM/9.X still remains in the **6.1 ES Volume 1 Chapter 19 Ground Conditions (Rev 2) (Tracked) [REP1-028]**. This should be updated to correctly signpost to the **BESS and Substation – Preliminary Geotechnical Risk Register [REP1-128]**.	

EA-024	Groundwater and Contaminated Land	Battery Energy Storage System (BESS) foundation solution	**Under Discussion** The Applicant has stated that the final construction detail will be confirmed at detailed design stage, informed by the Foundation Works Risk Assessment, drainage design and construction methodology. This assessment will consider the design of any sealed drainage to be incorporated into the final design. The relevant drainage principles are set out in **Firewater Containment and Drainage Strategy – Lime Down BESS [REP1-124]** and **FRA Appendix 11-6: Lime Down D / BESS [REP1-047]**, and will be secured through the detailed design process, detailed CEMP and the requirement for construction controls to be prepared substantially in accordance with the **Outline Construction Environmental**	The **Outline Construction Environmental Management Plan (oCEMP) [REP3-093]** will be updated to clarify that an appropriate foundation works risk assessment will be completed in relation to the BESS.

			Management Plan (oCEMP) [REP1-096]. In the updated **oCEMP [REP2-020]** the Applicant commits to produce a piling risk assessment (Table 5) or foundation works risk assessment (Table 13), but these are only proposed for the substation and not the BESS. This requires updating before we can resolve this issue.	
EA-025	Groundwater and Contaminated Land	Fire water supply and storage within the Outline Battery Safety Management Plan (oBSMP)	**Agree** - as per Deadline 2 response.	The Applicant notes this issue is agreed.
EA-026	Groundwater and Contaminated Land	Ground infrastructure will be left in-situ following the decommissioning phase	**Agree** - as per Deadline 2 response.	The Applicant notes this issue is agreed.

EA-027	Groundwater and Contaminated Land	Suitable mitigation where groundwater may be encountered.	**Under Discussion** Our previous comments remain valid as the required updates to Chapter 11, Appendix 11-10 and Chapter 19 have not been made. Previous comments copied below. Chapter 11 Table 11-1 ID 3.5.4 has not been updated. Chapter 11 Section 11.10, Appendix 11-1 and Chapter 19, which are referenced in ID 3.5.4, do not appear to have been updated with any relevant information. Discussion of requirements around dewatering in the oCEMP have not been updated. However, ground investigation works are committed to in the **REP1-097 7.12 Outline Construction Environmental Management Plan (Rev 2).** Completion of this, and subsequent detailed assessment of conditions, should be sufficient to resolve the issue. For completeness,	The Applicant notes the Environment Agency's comment. The hydrology and drainage documents submitted at Deadline 3 address the hydrology aspects of this matter. **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage (Rev 3) [EN010168/APP/6.1]** has been updated to signpost to pre-commencement ground investigation where groundwater may be encountered. This includes updates to the embedded mitigation and assessment text relating to groundwater control and protection measures. **ES Volume 3, Appendix 11-1: Flood Risk Assessment and Drainage Strategy Covering Report (Rev 3) [EN010168/APP/6.3]** has also been updated to confirm that pre-commencement ground investigation and infiltration testing will be undertaken prior to construction to confirm local ground conditions, infiltration suitability and the potential presence of groundwater. The findings will inform the subsequent detailed drainage and infrastructure design where required. The Applicant also notes the Environment Agency's acknowledgement that completion of

			we would like to see relevant chapters or supporting documents updated as relevant with additional information.	the ground investigation and subsequent detailed assessment of conditions should be sufficient to resolve the issue. This matter should therefore be resolved when the Deadline 3 hydrology updates are read alongside the corresponding updates to **ES Volume 1, Chapter 19: Ground Conditions (Rev 3) [EN010168/APP/6.1]** and the **Outline CEMP (Rev 4) [EN010168/APP/7.12]**, which provide the relevant ground conditions and construction management controls. Where groundwater is encountered, the detailed design and construction methodology will identify any required groundwater control, dewatering, containment, treatment, discharge, permitting or monitoring measures before works commence. These controls will be secured through the detailed CEMP and associated method statements. On this basis, the Applicant considers that EA-027 is resolved in principle, subject to the Environment Agency's review of the Deadline 3 updates.

EA-028	Groundwater and Contaminated Land	Per-and poly fluoroalkyl substances (PFAS) based materials	**Agree** - as per Deadline 2 response.	The Applicant notes this issue is agreed.
EA-029	Groundwater and Contaminated Land	Licensed groundwater abstractions	**Under Discussion** Resolved in principle. Previous comment re mains valid. The Applicant has stated that **7.19 Outline Ecological Protection and Mitigation Strategy (Rev 2) (Clean) [REP1-106]** was updated at Deadline 1 with a clarification concerning licensed groundwater abstractions. We believe this is an incorrect reference and it should be **6.3 Environmental Statement Volume 3, Appendix 19-10 Private Water Supply Correspondence with Wiltshire Council [APP-256]**. This has not been updated.	As noted by the Applicant previously, **6.3 Environmental Statement Volume 3, Appendix 19-10 Private Water Supply Correspondence with Wiltshire Council [APP-256]** is a record of correspondence with Wiltshire Council so there is no intention to update it. No licensed abstractions were identified within the stated study area, though licensed abstractions outside this area are noted and acknowledged in relation to Source Protection Zone 1 or 2 status. The Applicant can confirm that every effort will be made to identify private water supplies within the influence of the scheme, noting that not all private abstractions will be recorded.
EA-030	Groundwater and Contaminated Land	Thermal implications of cables	**Under Discussion** No additional infor mation has been submitted – previous com	The Applicant can confirm that the guidance provided by the EA has been noted and will be referenced in future submissions of **6.1 ES Volume 1 Chapter 19 Ground**

			ments remain valid. The Applicant has confirmed in **REP1-028 6.1 ES Volume 1 Chapter 19 Ground Conditions (Rev 2)** Table 19-6, that “Cables will be selected in order to minimise thermal loss considering available guidance from the EA.” In February 2026 we sent additional guidance on thermal impacts to the Applicant as requested. This set out our expected approach to considering thermal impacts, including conditions for when further desk-based assessment will be required. The Applicant does not appear to have referenced or otherwise considered this guidance. The Applicant has not provided commentary on whether all conditions can be discounted, and, if not, the outcomes of the assessment. The proposed mitigation is too vague to give us reassurance that thermal impacts on groundwater	**Conditions [REP3-023]**. Detailed assessments of thermal impacts from cables will be made once location-specific hydrogeological data is available from ground investigation to be completed prior to the construction phase.

			receptors has been appropriately mitigated.	
EA-031	Groundwater and Contaminated Land	The Battery Energy Storage System (BESS) Area drainage outfall automatically self-actuating valves	**Agree** - as per Deadline 2 response.	The Applicant notes this issue is agreed.
EA-032	Groundwater and Contaminated Land	Ground conditions	**Agree In Principle (subject to changes to the draft Development Consent Order see EA-013)** Pre-construction ground investigation will be secured via the Construction Environmental Management Plan on which we will be consultees. We recommend that a period of groundwater monitoring, in accordance with relevant British Standard guidance for site investigations, is included as part of the ground investigation.	The Applicant notes this comment and confirms that the ground investigation and subsequent groundwater monitoring will be undertaken in line with best practice, including BS10175

EA-033	Groundwater and Contaminated Land	Discovery and Inspection Strategy	**Agree** - as per Deadline 2 response.	The Applicant notes this issue is agreed.
EA-034	Groundwater and Contaminated Land	Inconsistency in the walkover surveys carried out.	**Under Discussion** Resolved in principle. The Applicant has noted our comments and agreed to make the required updates to the documents. We believe that the following documents require updating; **Appendix 19-1 [REP1-065], 19-4 [REP1-071], 19-6 [REP1-075]. & 19-7 [REP1-077]**. Previous comments included below as they remain useful. We note some changes made to the relevant documents, but some inconsistencies remain. For example, in Table 4 of both Appendix 19-1 and Appendix 19-4, it still states that a site walkover was carried out by Delta Simons on 31 January 2024. However, Section 1.2.16 of both appendices states that	The Applicant notes this and confirms that these amendments will be made.

			"A site walkover of Lime Down A was carried out between 1st and 2nd May 2025." We acknowledge that there may have been multiple site walkovers, but this is not explained in the text or PDA-009 EA-034. This is a minor issue, and we do not expect it to affect the outcomes of the assessments, but it remains unresolved.	
EA-035	Groundwater and Contaminated Land	Soil contamination during the operational phase.	**Under Discussion** Partially resolved. Table 13 of the **Outline Operational Environmental Management Plan [REP2-021]** has been updated to include reference to a discovery and inspection strategy. **REP1-028 6.1 ES Volume 1 Chapter 19 Ground Conditions (Rev 2)** Paragraph 19.11.12 and **REP1-115 7.26 Commitments Register (Rev 2)**, has not been updated as requested to include reference to a discovery and inspection	The Applicant notes this comment and will ensure that these amendments are made

			strategy during the operational phase.	
EA-036	Groundwater and Contaminated Land	Groundwater risks have not been appropriately assessed.	**Under Discussion** We have noted confirmation in **REP1-028 6.1 ES Volume 1 Chapter 19 Ground Conditions (Rev 2)** and the **REP1-097 7.12 Outline Construction Environmental Management Plan (Rev 2)** that a ground investigation will be completed. However, an outline scope and limitations of this in the submitted documents is still not clearly set out. We note the clarification of the scope in PDA-009 EA-036. This appears acceptable in principle, and we will resolve this issue. However, the Applicant should be aware that if we are not satisfied with the scope, methodology and interpretation of the investigation results, we may request further works pre-	The Applicant acknowledges the EA position and commits to designing a robust ground investigation in line with best practice and appropriate UK guidance, i.e. BS10175, which addresses all the data requirements previously outlined by the EA

			commencement before we can agree that risks to controlled waters have been adequately assessed and mitigation is appropriate.	
EA-037	Groundwater and Contaminated Land	Storage and management proposals for batteries have not been provided.	**Agree**- as per Deadline 2 response.	The Applicant notes this issue is agreed.
EA-038	Groundwater and Contaminated Land	Mitigation proposals managing risks to groundwater have not been adequately assessed.	**Agree** Resolved. The Applicant has updated the **Outline CEMP [REP1-096]** and **Commitments Register [REP1 114]** to include environmental controls for trenchless techniques.	The Applicant notes this issue is agreed.
EA-039	Groundwater and Contaminated Land	No Preliminary Risk Assessments (PRAs) for the interconnecting corridors between the main solar panel areas.	**Under Discussion** Resolved in principle. The Applicant has acknowledged that Chapter 19 Appendices require review and updates. We understand that there was some rationalisation	The Applicant acknowledges this comment and confirms that the study area boundaries will be reviewed to ensure that all relevant information is captured

			of study area boundaries between PEIR and ES which will be reviewed to ensure that all relevant information is captured.	
EA-040	Groundwater and Contaminated Land	Maps and data searches in appendices 19-1, 19-2 and 19-5 are not complete or specific to those sites	**Under Discussion** Resolved in principle. The Applicant has updated the Annexes to ES Volume 3, **Appendix 19-1 Lime Down A Desk Study [REP1-065], Appendix 19-2 Lime Down B Desk Study [REP1-067] and Appendix 19-5 Lime Down Desk Study [REP1-073].** This matter was also discussed at a meeting with the Applicant on 2nd June 2026. They explained that the map searches cover the whole revised proposed Order Limits. For completeness we require the explanation provided in the meeting to be documented within the affected Appendices (19-1, 19-2 and 19-5).	The Applicant agrees and will ensure such acknowledgements are captured in the final versions of these documents

EA-041	Groundwater and Contaminated Land	The PRA reports do not refer to the proposed Discovery and Inspection Strategy	**Agree** As per Deadline 2 response.	The Applicant notes this issue is agreed.
EA-042	Groundwater and Contaminated Land	PRA- off-site vehicle repair garage	**Agree** As per Deadline 2 response.	The Applicant notes this issue is agreed.
EA-043	Groundwater and Contaminated Land	Unclear whether ground investigation to confirm the conceptual model is proposed to be carried out for several parts of the Proposed Development.	**Agree** As per Deadline 2 response.	The Applicant notes this issue is agreed.
EA-044	Groundwater and Contaminated Land	Justification for selecting the distances beyond which off site contamination sources would not be significant.	**Agree** As per Deadline 2 response.	The Applicant notes this issue is agreed.

EA-045	Groundwater and Contaminated Land	Monks Park Mine	**Under Discussion** We note that the Applicant has stated that no Horizontal Directional Drilling (HDD) is planned in the vicinity of Monks Park Mine. Our previous comments also related to the potential stabilisation of the mine, which would require an assessment of risks to controlled waters which has not been addressed. We requested an update to Chapter 19 and Appendix 19-8 to address this issue. **Previous comments for information** We have reviewed the **REP1-130 9.14 Cable Route Corridor Mining Risk-Technical Memorandum** We note in section 6.2.4 there is a commitment to obtain geoenvironmental samples to be analysed for a range of relevant contaminants of	Amendments have been made to section 19.10.2, 19.11.9, Table 19-5 of **6.1 ES Volume 1 Chapter 19 Ground Conditions (Rev 3) [REP3-023]** in relation to the points raised by the EA. Amendments will also be made to Appendix 19-8 prior to final submission.

			potential concern. We support this proposal. Other discussion of contamination or the potential risk to controlled waters is not addressed, and we have identified no relevant updates to Chapter 19 or Appendix 19-8 which specifically address this issue. The potential for treatment and ground stabilisation of mine workings is discussed as Section 7. If mine workings requiring stabilisation are flooded and mine water is not pumped dry, the introduction of stabilisation materials could be construed as discharge direct to groundwater for which there would be need for risk assessment. This may need a permit. Many cement-based grouts contain PFA, and some may be prohibited. If displacing groundwater in tunnels, grout may have high barium content. Any pumping may require a permit for abstraction and	

			discharge after treatment. Pumping may also cause localised subsidence in some cases.	
EA-046	Groundwater and Contaminated Land	No drainage strategies are provided for the proposed 400kV and 132kV Substations.	**Under Discussion** The Applicant has stated that they will update ES Volume 3 Appendices 11-2 to 11 9 Flood Risk Assessment and Drainage Strategy - Lime Down A to E2 and Cable Connection Corridor [APP-211 to APP-218] to explicitly set out the substation drainage strategy. We had previously requested that oOE MP requires updating which has not been actioned. Previous comments copied for information. We have reviewed the **REP1-125 Firewater Containment and Drainage Strategy – Lime Down Substation (Revision 1, dated May 2026, Document Reference: EXAM/9.9)**, and	The Applicant notes the Environment Agency's comment. The Applicant confirms that the relevant Deadline 4 updates will clarify the local drainage principles for the substation areas. These updates will not fix the final substation drainage design, hardstanding extents, drainage catchments, attenuation volumes or outfall arrangements, as these depend on the final electrical and civil design. Where the detailed design introduces formal hardstanding or positively drained infrastructure, those areas will be treated as formal drainage catchments. The detailed drainage design will follow the principles set out in the FRA and Drainage Strategy suite, including use of the drainage hierarchy, appropriate SuDS, attenuation for the 1 in 100 year event plus climate change, controlled discharge where required, water quality controls, exceedance routing and maintenance arrangements. Final detailed drainage design will be submitted and

			this has provided some clarity. Many elements will need to be agreed during detailed design in due course. In paragraph 2.4.4 it states "[the oOEMP] confirms that retained firewater will be subject to inspection, testing and controlled disposal." We have not identified this information in the oOEMP, so this is not resolved. The fate of retained water is discussed in paragraph 5.2.1 and 5.2.2. As noted, the testing suite and sampling protocol can be agreed as part of a post-incident management procedure. In order to minimise delays after a fire event, we strongly recommend that an outline procedure be produced prior to operation. If the Applicant proposes to release captured water to the environment, a relevant	approved under **Requirement 11: Surface Water Drainage** of the **Draft DCO [REP3-005]**. The Applicant also notes the Environment Agency's comment on the **Outline OEMP [REP3-094]**. The **Outline OEMP [REP3-094]** will be updated at Deadline 4 to provide clearer signposting to the post-incident management procedure for retained firewater. This will be prepared prior to operation and will set out the principles for inspection, sampling, testing, continued containment or temporary storage, treatment where required, tankering, controlled disposal and any environmental permitting requirements. Retained water would not be discharged to the environment unless the relevant environmental permit or regulatory approval is in place. Where retained water cannot be released immediately, it would remain contained within the isolated drainage or containment system, or be transferred to suitable temporary storage or removed by tanker, until testing, permitting and disposal requirements have been satisfied. On this basis, the Applicant considers that EA-046 is being addressed through the Deadline 4

			discharge permit should be obtained from the Environment Agency. It can take approximately 4 months for these permits applications to be processed and approved. The contained water must be stored appropriately during this time.	updates, with the final detailed drainage and containment design secured through the DCO.
EA-047	Groundwater and Contaminated Land	Present the SuDS options with consideration of the need for sealed drainage.	**Agree** As per Deadline 2 response.	The Applicant notes this issue is agreed.
EA-048	Groundwater and Contaminated Land	Present the SuDS options with consideration of the need for sealed drainage.	**Agree** As per Deadline 2 response.	The Applicant notes this issue is agreed.
EA-048	Groundwater and Contaminated Land	Table 4: SuDS Mitigation Indices is blank.	Under Discussion Resolved in principle. The Applicant has noted our previous comment and will update Table 4 in ES Volume 3, **Appendix 11-6 Flood Risk Assessment and Drainage**	The Applicant welcomes the Environment Agency's confirmation that this matter is resolved in principle. The Applicant confirms that Table 4: SuDS Mitigation Indices has been populated in **ES Volume 3, Appendix 11-6: Flood Risk Assessment and Drainage Strategy - Lime**

			Strategy - Lime Down D BESS [REP1-047].	**Down D / BESS (Rev 3) [EN010168/APP/6.3]**, submitted at Deadline 3. The updated table identifies the relevant mitigation indices for the BESS drainage strategy, including lined permeable / porous paving, gravel filter drain / sub-base, lined attenuation storage and shut-off valve / isolation measures. The table also clarifies that emergency shut-off valve / isolation measures are provided for firewater and accidental spill containment only, and are not relied upon for routine surface water quantity management or standard SuDS water quality treatment. On this basis, the Applicant considers EA-048 resolved.
EA-049	Flood Risk Assessment	Functional Floodplain (Flood Zone 3b).	**Under Discussion** No further information has been submitted. Previous comments below. It appears some of the solar PV panel supports are within areas of functional floodplain within Lime Down D and Lime Down E2. In revision 2 (May 2026) of	The Applicant notes the Environment Agency's comment. The Applicant welcomes the Environment Agency's acknowledgement that the position on floodplain storage and flow obstruction appears reasonable based on the volumetric calculations and associated level estimates provided for Lime Down D and Lime Down E2.

			the updated Flood Risk Assessment and Drainage Strategy the Applicant describes how the panelled areas are not expected to give rise to a material loss of floodplain storage or material obstruction of flood flow routes. This seems reasonable based on the volumetric calculations and associated level estimates provided for Lime Down D and Lime Down E2. We note that the Applicant has undertaken further modelling for Lime Down E2 and will delineate Flood Zone 3b based on this modelling. We await this information before taking a final view on this matter.	The Applicant is continuing to progress the additional modelling work for Lime Down E2 to better define the functional floodplain position. The modelling outputs and associated Flood Zone 3b delineation will be provided as soon as possible. On this basis, the Applicant considers that EA-049 should be capable of resolution following the Environment Agency's review of the further Lime Down E2 modelling information.
EA-050	Flood Risk Assessment	Fencing must not inhibit flood flow routes.	**Under Discussion** No further information has been submitted. Previous com ments below.	The Applicant notes the Environment Agency's comment. The Applicant confirms that where perimeter fencing is required within the mapped Flood Zone 2 or Flood Zone 3 extents, it will comprise post and wire mesh fencing specified with the widest mesh aperture available within the

			No further information has been submitted. Previous comments below. Section 2.3.15 page 17 within the updated **REP1-048 6.3 ES Volume 3 Appendix 11-6 Flood Risk Assessment and Drainage Strategy Lime Down D (Rev 2)** notes that any fencing within areas of flood interaction will be permeable to both water and debris passage and will not impede flood flow routes. This is welcomed although we would ask that more specificity is provided. Please can the Applicant provide details on the type of fencing that will be used in terms of mesh spacing and how blockage risk will be managed. Mesh spacing should be as wide as possible to reduce blockage risk. There should be a commitment within the Operational Environmental Management Plan to ensure	selected fencing system, so as to maximise the passage of floodwater and debris and avoid obstruction of flood flows. Fencing in these locations will not be solid, close-boarded or fine-mesh. The detailed fencing specification will be confirmed at detailed design stage in accordance with this principle. A fixed mesh dimension is not proposed at this stage because the final fencing system has not yet been selected. However, the principle requiring the widest available mesh aperture within the selected system will be secured through the detailed design process. The **Outline OEMP [REP3-094]** will be updated at Deadline 4 to include inspection of fencing within mapped Flood Zone 2 and Flood Zone 3 extents following significant flood events, with removal of accumulated debris where required. On this basis, the Applicant considers EA-050 is being addressed through the Deadline 4 update to the **Outline OEMP [REP3-094]**.

			any debris is removed from fencing following floods.	
EA-051	Flood Risk Assessment	No assessment of the impacts the construction phase of the development will have on flood risk.	**Under Discussion** No further information has been submitted. Previous com ments below. The Applicant needs to undertake additional assessme nt of the impact the construction phase may have on the floodplain capacity and flow routes. Additionally, additional mitigatio n commitments may be needed. For example, there should be no storing of materials and/or construction compounds within flood zone 3b and where practicable outside of the 1 in 100 year extent.	The Applicant notes the Environment Agency's comment. The construction phase flood risk position has been clarified in the Deadline 3 updates to the relevant FRA and Drainage Strategy material. Temporary works and construction activities will be managed to maintain existing floodplain storage, floodplain capacity and overland flood flow routes. Temporary compounds, plant and material storage will be located outside areas identified as potentially susceptible to flooding where reasonably practicable. The Applicant will also update the **Outline CEMP [REP3-092]** at Deadline 4 to provide clearer signposting to this commitment, including avoidance of Flood Zone 3b / functional floodplain for construction compounds and material storage, and avoidance of the 1 in 100 year flood extent where practicable. On this basis, the Applicant considers EA-051 is being addressed through the Deadline 4 update to the **Outline CEMP [REP3-092]** .

EA-052	Flood Risk Assessment	It is not clear what freeboard allowances are proposed.	**Under Discussion** No further information has been submitted. Previous comments below. Within the updated Flood Risk Assessment and Drainage Strategy **REP1-048 6.3 ES Volume 3 Appendix 11-6 Flood Risk Assessment and Drainage Strategy Lime Down D (Rev 2)** and **REP1-052 6.3 ES Volume 3 Appendix 11-8 Flood Risk Assessment and Drainage Strategy Lime Down E2 (Rev 2)**(May 2026) paragraph 2.3.8 notes that electrical infrastructure including inverter, transformers, and substation, will either be located outside of modelled flood extents or raised above a minimum freeboard of 0.6 metres above the design flood level. This is welcomed, however, there doesn't appear to be a value assigned to the	The Applicant notes the Environment Agency's comment. The Applicant confirms that the 0.6 m freeboard allowance applies to sensitive electrical equipment, including inverters, transformers, substations and sensitive electrical equipment mounted on the solar PV panels, where such equipment is located within the relevant design flood extent. The lowest leading edge of a solar PV panel is not sensitive electrical equipment. The solar panel tables and support structures are flood-compatible elements and are not considered vulnerable to short-term water contact. It is therefore not necessary or proportionate to apply a 0.6 m freeboard requirement to the lowest leading edge of the panel itself. The Applicant has clarified this position in the Deadline 3 updates to the FRA and Drainage Strategy material. Where fixed or tracker panels are located within areas of flood interaction, sensitive electrical equipment mounted on the panels will be elevated so that it is no less than 0.6 m above the design flood level, including the appropriate climate change allowance. The lowest leading edge of the panel itself may sit

			freeboard applied above the design flood level for the solar PV panels. For Lime Down E, paragraph 2.3.13 states that these will be above the design flood level with an appropriate freeboard allowance. Paragraph 2.3.13 within the Flood Risk Assessment for Lime Down D/BESS states that for both fixed and tracker panels all sensitive electrical equipment mounted on the Solar PV Panels will be elevated so that there is not less than 0.6 metres of freeboard above the design flood level. For clarity, the Applicant should confirm what the freeboard will be to the lowest leading edge of the respective solar panels. The Applicant should make a commitment to ensure there is a 0.6 metre freeboard above the design flood level for the solar panels themselves. If a freeboard of less than 0.6	lower depending on the final fixed or tracker arrangement. On this basis, the Applicant considers EA-052 resolved.

			metres is being adopted for the Solar PV panels, then the Applicant should provide clear justification as to why this is reasonable and clarify what the minimum freeboard will be.	
EA-053	Flood Risk Assessment	Hydraulic model files for the Gauze Brook have not been reviewed.	**Under Discussion** The Applicant has now provided the model files and we have submitted our comments to them. The Applicant has indicated they will be submitted to the Examining Authority at Deadline 3.	The Applicant notes the Environment Agency's comment. The Applicant confirms that the Gauze Brook hydraulic model files have been provided to the Environment Agency for review and were submitted to the Examining Authority at Deadline 3. The Applicant is reviewing the Environment Agency's comments on the model files and will respond through ongoing engagement with the Environment Agency. On this basis, the Applicant considers EA-053 is being progressed through the Environment Agency's model review process.
EA-054	Flood Risk Assessment	It is not clear how the analysis extent area of 275,000m2 has been derived.	**Agreed.** As per Deadline 2 response.	The Applicant notes this issue is agreed.

EA-055	Flood Risk Assessment	Impacts of the solar panel support frames on flood flow conveyance is not discussed. Lime Down D/BESS	**Under Discussion** No further information has been submitted. Previous comments below. Within the updated Flood Risk Assessment and Drainage Strategy Lime Down D and Lime Down E2 paragraph 2.3.28 notes that the solar panel supports comprise discrete widely space elements with a negligible cumulative footprint relative to floodplain area. The Applicant describes how they would not materially impact floodplain conveyance or flow paths. Although not referenced this is generally supported by the sensitivity testing on Mannings roughness within the hydraulic model which shows the effects from increased floodplain roughness are generally contained within the order limits for the development where	The Applicant notes the Environment Agency's comment. The Applicant welcomes the Environment Agency's acknowledgement that the position on solar panel support frames and flood flow conveyance appears reasonable, and that this is generally supported by the Manning's roughness sensitivity testing within the hydraulic model. The Applicant confirms that the Gauze Brook hydraulic model files have been provided to the Environment Agency and submitted to the Examining Authority at Deadline 3. The Applicant is reviewing the Environment Agency's comments on the model files and will respond through the ongoing model review process. Any necessary clarification on flood flow conveyance impacts will be provided as part of that response. On this basis, the Applicant considers EA-055 is being progressed through the Environment Agency's review of the hydraulic modelling information.

			roughness is increased. Whilst this appears reasonable, we have received the model files and have sent our comments to the Applicant. This will help us to form a view on flood flow conveyance impacts	
EA-056	Flood Risk Assessment	It is not clear how the analysis extent area of 175,580m2 has been derived.	**Agreed** As per Deadline 2 response.	The Applicant notes this issue is agreed.
EA-057	Flood Risk Assessment	Impacts of the solar panel support frames on flood flow conveyance is not discussed. Lime Down E2	**Under Discussion** No further information has been submitted. Previous com ments below. Within the updated Flood Risk Assessment and Drainage Strategy Lime Down D and Lime Down E2 paragraph 2.3.28 notes that the solar panel supports comprise discrete widely space elements with a negligible cumulative footprint relative to floodplain area. The	The Applicant notes the Environment Agency's comment. The Applicant welcomes the Environment Agency's acknowledgement that the position on solar panel support frames and flood flow conveyance appears reasonable. The Applicant is continuing to progress the Lime Down E2 modelling work and review the Environment Agency's comments. The further modelling outputs and any associated clarification on flood flow conveyance impacts will be provided as soon as possible.

			Applicant describes how they would not materially impact floodplain conveyance or flow paths. Although not referenced this is generally supported by the sensitivity testing on Mannings roughness within the hydraulic model which shows the effects from increased floodplain roughness are generally contained within the order limits for the development where roughness is increased. Whilst this appears reasonable, we have received the model files and have sent our comments to the Applicant. This will help us to form a view on flood flow conveyance impacts.	On this basis, the Applicant considers EA-057 should be capable of resolution following the Environment Agency's review of the further Lime Down E2 modelling information.
EA-058	Outline Decommissioning Strategy	No clear commitment to the production of an outline or detailed Decommissioning Environmental	**Agreed** As per Deadline 2 response.	The Applicant notes this issue is agreed.

		Management Plan.		
EA-059	Cable Route Construction Method Statement	Cable Route Construction Method Statement	**Under Discussion** We note the amendment to the **Outline CEMP [REP2-019]** to include reference to the discovery strategy and updates to Table 13 in relation to the proposed ground investigation. We had previously requested that **Appendix 3-2 Cable Route Construction Method Statement [APP-183]** needs to be updated to include reference to the discovery strategy. This has not been actioned.	The Applicant will make the appropriate amendments to **Appendix 3-2 Cable Route Construction Method Statement (Rev 3)** submitted at deadline 4 **[EN010168/APP/6.3APP-183].**
EA-060	Biodiversity Net Gain	Trading Rules	**Agree** As per Deadline 2 response.	The Applicant notes this issue is agreed.
-028EA-061	Biodiversity Net Gain	Full Biodiversity Net Gain Metric	**Agree** As per Deadline 2 response.	The Applicant notes this issue is agreed.

		has not been provided.		
EA-062	Outline Landscape and Ecological Management Plan	Planting strategy misses opportunities to enhance the environment.	**Agree** As per Deadline 2 response.	The Applicant notes this issue is agreed.
EA-063	Water Framework Directive Assessment	Change the description from “Supports Good” to “Not High” and possibly add an explanation.	**Agree** As per Deadline 2 response.	The Applicant notes this issue is agreed.
EA-064	Water Framework Directive Assessment	The assessment does not identify or discuss Groundwater Dependent Terrestrial Ecosystems (GWDTEs)	**Agree** As per Deadline 2 response.	The Applicant notes this issue is agreed.

EA-065	Water Framework Directive Assessment	Subsurface infrastructure such as the Cable Corridor could impact the status of WFD Groundwater Bodies and should not be excluded from assessment.	**Agree** As per Deadline 2 response.	The Applicant notes this issue is agreed.
EA-066	Outline Battery Safety Management Plan	Provide details of the products to be used in the proposed liquid cooling systems, and the means by which it will be contained, captured and disposed.	**Agree** As per Deadline 2 response.	The Applicant notes this issue is agreed.
EA-067	Outline Battery Safety Management Plan	Provide more detail about the inspection and maintenance frequency and protocols for key	**Agree** As per Deadline 2 response.	The Applicant notes this issue is agreed.

		controls at the BESS site.		
EA-068	Outline Battery Safety Management Plan	No details are provided of the proposed testing suite or sampling protocol for potentially contaminated firewater captured at the BESS in a fire event.	**Agree** As per Deadline 2 response.	The Applicant notes this issue is agreed.
EA-069	Outline Battery Safety Management Plan	It is not clear whether the proposed lining of the drainage system at the BESS would be impermeable.	**Agree** As per Deadline 2 response.	The Applicant notes this issue is agreed.
EA-070	Outline Construction Environmental Management Plan	Water Quality Mitigation Measures are insufficient	**Under Discussion** Water Quality Mitigation Measures associated with Vehicle washdown, concrete laying, foul water strategy and drilling fluid have been resolved due to updates to: **REP1-018**	The Applicant notes the Environment Agency's comment and welcomes confirmation that the water quality measures for vehicle washdown, concrete laying, foul water strategy and drilling fluid are resolved. The Applicant confirms that **Outline Construction Environmental Management**

			6.1 ES Volume 1 Chapter 11 Hydrology, Flood Risk and Drainage (Rev 2); REP1-097 7.12Outline Construction Environmental Management Plan (Rev 2) REP1-101 7.14 Outline Decommissioning Strategy (Rev 2). However, **REP1-097 7.12Outline Construction Environmental Management Plan (Rev 2)** Table 5 and Table 13 need to be consistent with mitigation measures about fuel, oil and chemical storage. There are currently inconsistencies, and Table 5 is lacking detail. The storage of fuel, oil and chemical should be on impermeable surfaces, with appropriately sized bunding capacity, but also be covered to reduce contamination from accumulated rainwater. Where necessary, a valve to drain rainwater may be necessary.	**Plan (Rev 4) [EN010168/APP/7.12]**, submitted at Deadline 3, has been updated to address fuel, oil and chemical storage in Table 5 and Table 13. The updated wording confirms that fuel, oil, chemicals and other potentially polluting substances will be stored on impermeable surfaces and within appropriately sized secondary containment. Table 5 also confirms that, where appropriate, containers will be covered and bunded to 110% of the stored volume. Table 13 confirms that bunded storage areas will be sized and maintained to contain at least 110% of the largest container or 25% of the total storage volume, whichever is greater, with rainwater management and oil separation included where required. On this basis, the Applicant considers EA-070 resolved.

			Oil separators could also be used.	
EA-071	Outline Site Waste Management Plan	No inclusion that waste will be assessed in accordance with Waste Technical Guidance WM3	**Agree** As per Deadline 2 response.	The Applicant notes this issue is agreed.
Informatives / Advice to Applicant				
EA-072	Permitting	Permitting Informative	**Agree**	The Applicant notes this issue is agreed.
EA-073	Flood Risk Assessment	Compensatory flood storage	**Under Discussion- no information provided to address this.** Whilst we recognise it is uncertain at this stage if it isn't feasible to sequentially locate the substation within Lime Down C1 outside of the mapped surface water flow route an assessment of the	The Applicant notes the Environment Agency's comment. The Applicant confirms that the intention remains to locate the Lime Down C1 substation outside the mapped surface water flow route where practicable. Where this is not feasible, the detailed design will assess the effect of the substation platform on the relevant surface water flow route,

			impact is required to ensure flood risk isn't increased elsewhere and if it is appropriate mitigation (compensatory storage) needs to be put in place to ensure the development satisfies paragraph 5.8.12 within the overarching National Policy Statement for Energy. Therefore, if “where feasible" is included there would need to be acknowledgement that further assessment and potentially compensatory storage may be required.	including any potential loss of storage or obstruction to flow conveyance. Where the assessment identifies a material effect, appropriate mitigation will be incorporated into the detailed drainage design. This may include localised regrading, maintained exceedance routing, compensatory storage or other equivalent measures as required to ensure flood risk is not increased elsewhere. This will be secured through **Requirement 11: Surface Water Drainage** of the **Draft DCO [REP3-005]**. On this basis, the Applicant considers EA-073 is capable of resolution through detailed design, with the assessment and mitigation approach secured through the DCO.
EA-074	Outline Landscape and Ecological Management	Herbicide use	**Under Discussion-** the Outline Landscape and Ecological Management has not been updated.	The Applicant has updated the **Outline Landscape and Ecological Management Plan (LEMP) [REP3-100].** Paragraphs 1.3.122 and 1.3.135 of the document now provide the details of relevant permission required for herbicide application near watercourses. On this basis, the Applicant considers EA-074 is now resolved.

EA-075	Outline Ecological Protection and Mitigation Strategy	Improvements to document	**Agree** As per Deadline 2 response.	The Applicant notes this issue is agreed.
EA-076	Firewater Drainage	Detail of fire water management. A standalone drainage plan is strongly recommended.	**Agree** As per Deadline 2 response.	The Applicant notes this issue is agreed.
EA-077	BESS and Substation Drainage	Proposed drainage layout for the BESS and 400kv Substation development.	**Agree** As per Deadline 2 response.	The Applicant notes this issue is agreed.
EA-078	Lime Down E Desk Study	former RAF airfield at Hullavington.	**Agree** As per Deadline 2 response.	The Applicant notes this issue is agreed.
EA-079	outline Battery Safety Management Plan	Battery replacements	**Agree** As per Deadline 2 response.	The Applicant notes this issue is agreed.
EA-080	Intrusive Ground Investigations	Intrusive Ground Investigations	**Agree** As per Deadline 2 response.	The Applicant notes this issue is agreed.

EA-081	Decommissioning	Decommissioning of cables	**Agree** As per Deadline 2 response.	The Applicant notes this issue is agreed.
EA-082	Ground Investigations	Purpose, scope and extent of ground investigations	**Agree** As per Deadline 2 response.	The Applicant notes this issue is agreed.
EA-083	Battery Safety Management Plan	Manual isolation of BESS systems	**Agree** As per Deadline 2 response.	The Applicant notes this issue is agreed.
EA-084	Battery Safety Management Plan	Battery storage infrastructure should not be delivered to site before all firewater containment arrangements are installed and commissioned.	**Agree** As per Deadline 2 response.	The Applicant notes this issue is agreed.
EA-085	Battery Safety Management Plan	Emergency Response Plan	**Agree** As per Deadline 2 response.	The Applicant notes this issue is agreed.

EA-086	Foundation Design	Piling Risk Assessment references	**Agree** As per Deadline 2 response.	The Applicant notes this issue is agreed.
EA-087	Commitments Register	Horizontal Directional Drilling	**Agree** As per Deadline 2 response.	The Applicant notes this issue is agreed.
EA-088	Commitments Register	Siting of construction compounds and stockpiles	**Agree** As per Deadline 2 response.	The Applicant notes this issue is agreed.
EA-089	Commitments Register	Plant maintenance	**Agree** As per Deadline 2 response.	The Applicant notes this issue is agreed.
EA-090	Commitments Register	Breakout contingency procedures	**Agree** As per Deadline 2 response.	The Applicant notes this issue is agreed.
EA-091	Commitments Register	Per- and polyfluoroalkyl substances (PFAS)	**Agree** As per Deadline 2 response.	The Applicant notes this issue is agreed.
EA-092	Commitments Register	BESS and substation drainage infrastructure	**Agree** As per Deadline 2 response.	The Applicant notes this issue is agreed.

EA-093	Commitments Register	Hydrological risk assessment	**Agree** As per Deadline 2 response.	The Applicant notes this issue is agreed.

EA Written Rep (WR) REP1-151 ID Ref in REP2-039	**Issue**	**Topic(s)**	**Environment Agency Updated Position following Deadline 2 submissions**	**Applicant's Response**	**Author ID [INTERNAL]**
WR EA-001	Ecology and Biodiversity	Biodiversity Net Gain	**Agree**	The Applicant notes this issue is agreed.	
WR EA-002	Draft DCO	"Substantially in accordance with" requirements	**Under Discussion** We maintain our previous positi on set out in our written representation **REP1-151**	The Applicant maintains its position as set out in their response to EA-002 within the **Applicant's Response to Written Representations [REP2-039].**	PM-2
WR EA-003	Draft DCO Soil Management	Requirement 17	**Agree**	The Applicant notes this issue is agreed.	

WR EA-004	Draft DCO	Procedure for Discharge of Requirements	**Under Discussion** We note the increase in timeframe but request the full 15 working days consultation period as set out in our **written representation REP1-151**	The Applicant maintains its position as set out in their response to EA-004 within the **Applicant's Response to Written Representations [REP2-039].**	PM-2
WR EA-005	Water Quality	Foul Drainage	**Agree** We acknowledge updates to **REP1-017 Chapter 11 Hydrology, Flood Risk and Drainage (Rev 2)** section 11.10.27, 11.10.64 and 11.10.67. Details in Table 5 in **Outline Construction Environmental Management Plan (OCEMP) [REP2- 019],** section 2.13 of **Outline Operational Environmental Management Plan (OOEMP) [REP2-021]** and Table 15 in **Outline Decommissioning Strategy (ODS) [REP1-100]** are consistent with Chapter 11. This resolves this	The Applicant notes this issue is agreed.	

			issue which was raised in our **written representation REP1-151**.		
WR EA-006	Water Quality	Water Quality Monitoring	**Agree** We acknowledge updates to section 11.9.2 in **Chapter 11 [REP1-017]**, **REP1-096 OCEMP Table 5, REP1-098 OOEMP** Table 5 and **REP1-100 ODS** Table 5. Details are sufficient at this point in the project, however, as commented in relation to Relevant Reps EA-002 we still need to be named as a consultee for CEMP and OEMP to ensure we can review details post-consent. This resolves this issue which was raised in our **written representation REP1-151**.	The Applicant notes this issue is agreed.	
WR EA-007	Water Quality	Vehicle washdown and refuelling areas	**Agree** We acknowledge details clarifying distances from watercourses where vehicle washdown and refuelling will	The Applicant notes this issue is agreed.	

			occur were added to Table 11-1 and **section 11.9.4 in REP1-017 Chapter 11 Hydrology, Flood Risk and Drainage (Rev 2).** Paragraph 11.9.4 in **REP1-017 Chapter 11 Hydrology, Flood Risk and Drainage (Rev 2)** and Table 5 of **OCEMP [REP1-96]** were updated to address concerns over water quality impacts from concrete laying and washout. Section 11.9.2-11.94 in **REP1-017**, Table 5 of **OCEMP [REP1-96]** and Table 5 of **ODS [REP1-100]** were updated to address concerns over wheel washing controls and SuDS.		
WR EA-008	Water Quality	Concrete management	**Agree** We acknowledge details clarifying distances from watercourses where vehicle washdown and refuelling will occur were added to Table 11-1 and section 11.9.4 in **REP1-017 Chapter 11 Hydrology, Flood Risk and Drainage (Rev**	The Applicant notes this issue is agreed.	

			2). Paragraph 11.9.4 in **REP1-017 Chapter 11 Hydrology, Flood Risk and Drainage (Rev 2)** and Table 5 of **OCEMP [REP1-96]** were updated to address concerns over water quality impacts from concrete laying and washout. Section 11.9.2-11.94 in **REP1-017**, Table 5 of **OCEMP [REP1-96]** and Table 5 of **ODS [REP1-100]** were updated to address concerns over wheel washing controls and SuDS.		
WR EA-009	Water Quality	Sediment control and SuDS	**Agree** We acknowledge details clarifying distances from watercourses where vehicle washdown and refuelling will occur were added to Table 11-1 and section 11.9.4 in **REP1-017 Chapter 11 Hydrology, Flood Risk and Drainage (Rev 2).** Paragraph 11.9.4 in **REP1-017 Chapter 11 Hydrology, Flood Risk and Drainage (Rev 2)** and Table 5 of **OCEMP**	The Applicant notes this issue is agreed.	

			[REP1-96] were updated to address concerns over water quality impacts from concrete laying and washout. Section 11.9.2-11.94 in **REP1-017**, Table 5 of **OCEMP [REP1-96]** and Table 5 of **ODS [REP1-100]** were updated to address concerns over wheel washing controls and SuDS.		
WR EA-010	Water Quality	Fuels, oils and chemical storage	**Under Discussion** We note updates to Table 5 and Table 13 of **OCEMP [REP1-96]** about volume capacity of storage. However, as stated previously in **[REP2-049] EA-070**, Table 5 and Table 13 need to be consistent with mitigation measures about fuel, oil and chemical storage. There are currently inconsistencies, and Table 5 is lacking detail. The storage of fuel, oil and chemical should be on impermeable surfaces, with appropriately sized bunding capacity, but also be covered to	The Applicant notes the Environment Agency's comment. The Applicant confirms that **Outline Construction Environmental Management Plan (Rev 4) [EN010168/APP/7.12]** has been updated to address fuel, oil and chemical storage in Table 5 and Table 13. The Applicant accepts that the wording in the two tables should be fully aligned. The **Outline CEMP [REP2-019]** will therefore be updated	HYD-2

			reduce contamination from accumulated rainwater. Where necessary, a valve to drain rainwater may be necessary. Oil separators could also be used.	to ensure Table 5 and Table 13 include consistent controls for fuel, oil, chemical and other potentially polluting substance storage. The updated wording will confirm that these substances will be stored on impermeable surfaces, within appropriately sized secondary containment, and in covered storage areas where practicable to reduce the accumulation of contaminated rainwater. Bunded storage will be sized to contain at least 110% of the largest container or 25% of the total storage volume, whichever is greater. Rainwater management, controlled drainage valves and oil separation will be included where required, based on the nature and scale of the storage area and the sensitivity of nearby receptors. On this basis, the Applicant considers WR EA-010 is being	

				addressed through the further update to the **Outline CEMP [REP2-019]** .	
WR EA-011	Water Quality	Wheel wash water disposal	**Agree** We acknowledge details clarifying distances from watercourses where vehicle washdown and refuelling will occur were added to Table 11-1 and section 11.9.4 in **REP1-017 Chapter 11 Hydrology, Flood Risk and Drainage (Rev 2).** Paragraph 11.9.4 in **REP1-017 Chapter 11 Hydrology, Flood Risk and Drainage (Rev 2)** and Table 5 of **OCEMP [REP1-96]** were updated to address concerns over water quality impacts from concrete laying and washout. Section 11.9.2-11.94 in **REP1-017**, Table 5 of **OCEMP [REP1-96]** and Table 5 of **ODS [REP1-100]** were updated to address concerns over wheel washing controls and SuDS.	The Applicant notes this issue is agreed.	

WR EA-012	Water Quality	Outline Decommissioning Strategy	**Agree** With updates to Table 5 of **Outline Decommissioning Strategy [REP1-100]** we are satisfied that SuDS features, vehicle washing, refuelling distances from watercourses, and foul water strategy is consistent with the OCEMP.	The Applicant notes this issue is agreed.	
WR EA-013	Water Quality	Watercourse buffers	**Agree** Table 11-1 of **Volume 1 Chapter 11 Hydrology, Flood Risk and Drainage [REP1-017]** and **Table 5 of OCEMP [REP1-096]** confirmed a distance of 10m from watercourses for vehicle washdown and refuelling.	The Applicant notes this issue is agreed.	
WR EA-014	Water Quality	Horizontal Directional Drilling (HDD) and Per- and polyfluoroalkyl substances (PFAS)	**Agree** Table 5 of **OCEMP [REP1-96]** confirmed distances of HDD launch and reception pits, and using PFAS free products, where practical. Table 13 of OCEMP confirmed there would	The Applicant notes this issue is agreed.	

			be a drilling fluid breakout contingency procedure. Section 1.2.4 of **REP1-094 Water Framework Directive Assessment** suggested no deterioration due to HDD.		
WR EA-015	Statement of Common Ground	Statement of Common Ground	**Under Discussion** The next version of the Statement of Common Ground will be submitted at Deadline 4.	The Applicant confirms that there is ongoing engagement with the EA regarding the Statement of Common Ground with the Environment Agency **[REP2-028]** and the first draft was submitted at Deadline 2. The Applicant anticipates submitting an updated draft at Deadline 4.	SOCG-2

3.6 Stop Lime Down

Reference	SLD Reference	Document	Comments/Issue Raised	Applicant's Response
Landscape				
SLD-001	REP2-046 Section 2	Wiltshire Comments on WRs	4.1.1. SLD welcome comments from the Council on its submissions. SLD would note that some of the concerns identified (e.g. at §2.1, which suggests SLD has taken a simplistic approach at §3.5.5 of SLD's Written Representation) are answered by referring to the full report produced by SLD's expert (e.g. at §5.1.43 of Appendix B **[REP1-170]**, to which §3.5.5 of SLD's Written Representation cross-referenced).	The Applicant notes this comment.
SLD-002	REP2-048 §25.2	Wiltshire Comments on D1 and D1A Documents	4.1.2. SLD notes and agrees with the Council's comments at §25.2 concerning the Technical Note on Landscape Fabric and Landscape Character **[REP1-**	The Methodology used within the LVIA **ES Volume 1 Chapter 8 [REP3-025]** has been through consultation with Officers from Wiltshire Council and is an Agreed Matter in the **Statement of Common Ground with**

			121] which is an important new point.	**Wiltshire Council [REP2-025]** at paragraph 3.4.6. The definition of Landscape Fabric has been consistently set out within the LVIA **[REP3-025]** and supporting Appendices, including within the Glossary of the LVIA Methodology **[REP1A-006]** from submission at Scoping. The Applicant also provided a full response directly to Wiltshire Council in respect of this point at WCD1-176 of the **Applicant's Response to Submissions Received at Deadline 2 [REP3-129]** which was submitted at Deadline 3.
SLD-003	REP2-048§25.2	Wiltshire Comments on D1 and D1A Documents	4.1.3. These comments relate to the LVIA's definition of "fabric", which, in the Council's landscape expert's opinion (with which SLD's landscape expert agrees) should include hard / built elements as well as "soft" elements such as vegetation and water (as GLVIA3 indicates it should) –	See response to SLD-002 above.

			see for example the Council's §25.4.	
SLD-004	REP2-048§25.2	Wiltshire Comments on D1 and D1A Documents	4.1.4. This is an important and relevant matter because – along with having double-counted landscape / visual mitigation as landscape / visual enhancement, and not having factored in the adverse effects of mitigation measures – the omission is a reason for the LVIA having incorrectly concluded that the Proposed Development would result in Moderate Beneficial (Significant) effects on the character of sites Lime Down A – E, and thus concluded there would be "beneficial landscape effects within the setting of the CNL in the long term which would further the purposes of the designation."	The LVIA **[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 views and visibility. As set out within the LVIA Methodology **[REP1A-006]**, the LVIA has assessed Landscape Fabric and Landscape Character independently. Landscape Fabric relates only to land within the Order Limits of the Scheme and refers only to the physical elements and features within each of the five Lime Down Solar Sites and the physical changes they undergo, whereas Landscape Character is a distinct, recognisable, and consistent pattern of elements in the landscape that makes one landscape different from another, rather than better or worse. The methodology used in the LVIA has been developed in response to the increasing number of large-scale solar farms where there is potential for large scale landscape change. By

				treating Landscape Fabric as a separate Landscape Receptor, the approach allows the physical landscape benefits of the Scheme (such as new hedgerows and meadows) at the Site level to be quantified without influencing the separate assessment on Landscape Character. Keeping this assessment independent of the assessment of Landscape Character avoids for any 'double counting'. It is recognised that developments of this nature directly change the character of the landscape within the boundaries of the Site itself, with the individual fields proposed for infrastructure presenting as a solar array, a change from a 'greenfield' open agricultural farmland to renewables. The assessment of Landscape Character (and Visual Amenity) recognises the adverse effects associated with the proposed mitigation (high hedgerows) required to provide screening of the Array and associated infrastructure. This change (arising from the proposed infrastructure and the proposed mitigation) is what then ultimately indirectly impacts the character of the wider receiving landscape. It should be noted that this change is not limited to renewable projects, and that any development of

				a greenfield site would result in the same level of adverse impact at the site level. The Landscape Character change associated with the addition of the array and associated infrastructure is considered within the assessment of effects on Landscape Character, which clearly sets out that effects on landscape character which have been assessed as Moderate Adverse (Significant at Construction and Year 1, reducing to Moderate / Minor Adverse at Year 15 as a consequence of the quantifiable mitigation and enhancement measures within the Sites. At no point has the LVIA identified beneficial effects to Landscape Character. Due to the Scheme's location on the edge of the CNL avoidance measures have been incorporated into the Scheme Design as part of the Mitigation Hierarchy as set out in Section 8.9 of the LVIA **[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. Discussion with the Cotswolds National Landscape Board CNLB took place as part of the

				Consultation process on 24th April 2025 are noted in Table 2: Summary of Engagement Undertaken in Volume 3, Appendix 8.6: Assessment of Effects on the Cotswolds National Landscape and its Special Qualities Appendix 8-6 **[APP-197]**. Following this consultation, information was received from CNL on positive enhancement measures from CNL's Nature Recovery Lead including the provision of wildflower meadows and scrub. Following this and further consultation the Scheme was revised as part of the iterative design process. The following changes were made; • No infrastructure within parcels on the edge of the CNL boundary in the northern part of A1, A11 and A12, B12, C1, C6, C8, part of C9 and the majority of C10. Subsequently the CNL Board (CNLB) have requested that panels be removed from all of field C9 and the field used to provide additional positive enhancement measures. These changes form part of the Change Application submitted to the ExA on 25 June 2026. • Parcels C1, C6, C8, C9 and C10 have remained within the Scheme and provide

				opportunities for positive enhancement measures. • Parcels C2, C3 and C4 which are not on the edge of the CNL but were considered to be within the setting of the CNL, were removed from the Order Limits. The proposals within C1, C6, C8, C9 and C10 do not include mitigation measures to reduce the effects of the Scheme in adjacent parcels. They are distinct enhancement measures which further the purposes of the CNL. These areas within the setting of the CNL have been specifically targeted for positive enhancement to further the purposes of the CNL. As all existing hedgerows within the Scheme are proposed to be strengthened and allowed to grow out to provide landscape and visual mitigation, it was recognised that a different management regime for hedgerows on the edge of the CNL was required to conserve its character and open views. As mitigation of adverse effects is not required on the edge of the CNL due to the offset to infrastructure, maintaining hedgerows at their current height of c1.5m bordering the CNL within Site C was proposed.

				It is agreed that this should not be considered to be a positive enhancement measure but rather a specific management objective to maintain open views of the landscape from the CNL. It was important to distinguish this from the proposal to strengthen and allow hedgerows to grow out to 4.5m across the rest of the Scheme where mitigation of adverse effects are required. The creation of wildflower meadows and margins as well as areas of scrub and new hedgerows as set out within the LEMP are proposed in the northern part of A1, A11 and A12, B12, C1, C6, C8, part of C9 and the majority of C10. These features would be 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 CNLB, the CNL Management Plan and Nature Recovery Strategy and are considered to 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].**
Traffic and Transport				
SLD-005	REP 2-039, §WC-011	Applicant's Response to Written Representations	4.1.5. The Applicant seeks to justify the decision not to widen roads outside of the Highway Improvement Areas on the basis of average levels of HGV movements are lower than the "peak" levels originally identified, the temporary nature of the construction period, the desire to avoid impacts on vegetation and landscape character and "over-engineering". Reference is made to the additional information (Annex K in **[REP1-057]** and **[REP1-059]**) that show the places where two HGVs are considered capable of passing each other.	The Applicant presented hourly flows in Annex F **ES Volume 3, Appendix 13-1:Transport Assessment (Rev 3) [REP3-065]** to understand the frequency of HGV's passing each other on construction routes to inform the number of passing places required so the mitigation is not over engineered.

SLD-006	REP 2-039, §SLD-195	Applicant's Response to Written Representations	4.1.6. The following comment is made: "Once the Final CTMP is produced the final construction numbers will be known. At this point a check will be done to see if any of these numbers exceed the AADT's included on the links in the ES assessment. If it is exceeded then a further ES assessment will be required". This appears to suggest that if the estimates of HGVs are incorrect, the numbers will be revised and the ES amended. The implication is that the current assessments may not represent a "worst case" assessment and relevant consultees and the Examiners may not be currently presented with the correct information on which to base reliable judgements.	The Applicant confirms that the final CTMP will need to confirm that the conclusions of the environmental assessment in relation to traffic flows are not exceeded and this is a standard inclusion for a detailed CTMP.
Ecology				

SLD-007	REP 2-039, §WC-005, §WC-050-054	Applicant's Response to Written Representations	4.1.7. Mr. Valori of Betts Ecology notes the recurring point regarding the uncertainty of the extent of hedgerow removal permitted under the DCO. The Applicant refers several times to their Outline EPMS [REP1-106] and the DCO as detailing the extent to which hedgerow removal powers can be exercised, as well as confirming that Wiltshire Council will be required to approve the detailed EPMS. As a consequence, there remains continued uncertainty regarding the extent of hedgerow clearances which are anticipated as being necessary, and a "worst case" assessment should be made.	The Applicant notes this comment. The Applicant refers to the response provided to WC-005 on pages 24 – 25 of **The Applicant's Response to Written Representations [REP2-039]**. The Applicant considers that a reasonable worst-case scenario relating to hedgerow removal has been assessed as part of ES Volume 1, Chapter 9: Ecology and Biodiversity and is in accordance with hedgerow removal powers that can be exercised under Schedule 12 of Article 40 of the **draft DCO [REP3-005].** The Applicant also refers SLD to its response to DCO1.27 in **the Applicant's Response to the Examining Authority's First Written Questions [REP3-128]** which also addresses this point.
SLD-008	REP 2-039, §WC-007	Applicant's Response to Written Representations	4.1.8. Mr. Valori generally agrees with the Applicant that solar panels do not, necessarily, prevent skylark foraging along the solar fields' buffers or among the panels,	The Applicant welcomes this comment.

			provided suitably extensive patches of nesting habitat surround them as well. In this case, a sufficiently wide grassland strip is indeed more likely to provide a more stable source of food than an arable field without any leys.	
SLD-009	REP 2-039,§WC-007	Applicant's Response to Written Representations	4.1.9. That being said, these boundary buffers are no replacement for actual, open grassland nesting habitat.	The Applicant agrees with SLD's comment. As set out in paragraphs 9.12.32 to 9.12.33 of ES **Chapter 9 [REP1-015]** the provision of habitat likely to be of increased foraging value for skylarks is considered to reduce the impact of displacement on this species. Paragraphs 9.12.34 to 9.12.37 of **ES Chapter 9 [REP1-015]** describe how a number of open fields will be retained and enhanced to provide optimal habitat for skylarks as part of additional mitigation. Nevertheless, the Applicant acknowledges that a residual adverse impact on skylarks is anticipated as a result of the Scheme. This is transparently reported in **ES Chapter 9 [REP1-015].**
SLD-010	REP 2-039,§WC-007	Applicant's Response to	4.1.10. In Mr. Valori's opinion, the Applicant should monitor skylark numbers as a long-term	The Applicant agrees with SLD that long-term monitoring of bird populations, including skylarks, should be undertaken at the Scheme. An outline ecological monitoring strategy is set

		Written Representations	measure, to confirm that proposed mitigation and enhancement is working. There should be an escalation process if it is established that it is not effective.	out in Section 1.4 of the **Outline LEMP [REP3-100]**, which has been designed to assess the effectiveness of ecological mitigation measures and to facilitate the early identification of any remediation measures or management changes that may be required. The outline monitoring strategy includes monitoring of bird populations across the Solar PV Sites, both within fields containing Solar PV Infrastructure and within ecological mitigation areas. Further details of this monitoring will be set out within the final detailed LEMP, which will be secured through DCO Requirement.
SLD-011	REP 2-039, §WC-062	Applicant's Response to Written Representations	4.1.11. Mr. Valori agrees with Wiltshire Council. While the Applicant would be securing a District-Level Licence for the Cable Route Corridors, the Applicant has not provided good justification for not doing so for the Solar PV Sites and further information is needed in relation to the proposed GCN mitigation strategy.	The Applicant notes this comment. The Applicant refers to the response provided to WC-062 on pages 121 – 125 of **The Applicant's Response to Written Representation [REP2-039]**. It is the Applicant's view that the impact avoidance and reduction measures described in paragraph 9.12.26 of **ES Chapter 9 [REP1-015]** and detailed within **Outline EPMS [REP3-102]** are appropriate and sufficient for avoiding impacts on newts at the Solar PV Sites.

SLD-012	REP 2-048, §5.2, §6.1	Wiltshire Council's comments on Deadline 1 and 1A Submissions	4.1.12. Mr. Valori strongly agrees with the points raised by Wiltshire Council. It is noted that given proposed culverted crossings across wet ditches have not been subject to any in-depth ecological analysis. As a consequence, there is a risk that impacts to white-clawed crayfish are being underestimated.	The Applicant notes this comment. The Applicant refers to the response provided to WCD1-047 and WCD1-048 on pages 47 – 51 of **The Applicant's Response to Comments Received at Deadline 2 [REP3-128]**. It remains the Applicant's view that the assessment with regards to white-clawed crayfish in **ES Chapter 9 [REP1-015**] is robust
SLD-013	REP 2-049, §EA-021	Environment Agency response to D1 and D1A submissions	4.1.13. Mr. Valori agrees with the Environment Agency's recommendation that stream buffers be extended from 8m to 10m.	The Applicant's position on watercourse buffers is set out in response to EA-021 in **Applicant's Response to Submissions Received at Deadline 2 [EXAM/9.30]**. The Applicant has not committed to extending all stream or watercourse buffers from 8 m to 10 m. Different buffers apply to different features and activities, based on their sensitivity, function and regulatory context. An 8 m buffer is retained for lower sensitivity ditches and watercourses where no higher sensitivity criteria are triggered. Larger buffers are applied where required by the ecological buffer criteria or by specific construction, operational or biosecurity controls. This includes 10 m buffers where specified by the relevant ecological criteria and a 15 m stand-

				off for staff, plant and vehicle washdown where required by the **Outline Ecological Protection and Mitigation Strategy [REP3-102]**.
Noise				
SLD-014	REP2-039 §SLD-223	Applicant's Response to Written Representations	4.1.14. SLD does not repeat the existing points of disagreement between the parties. However, SLD's expert (Mr Ian MacArthur) notes that the Applicant asserts a "sustainable balance" of mitigation versus reducing towards LOAEL without evidencing or explaining balance. It is unclear what investigation has been done to demonstrate these diminishing returns.	A summary of the Applicant's position on this matter is provided in the Applicant's Response to the **Examining Authority's First Written Questions [REP3-128]** at item NV1.11 as well as in the **Applicant's Response to Written Representations [REP2-039]**, item SLD-240.
SLD-015	REP2-039 §SLD-225	Applicant's Response to Written Representations	4.1.15. It remains the case that the Applicant has selected figures at or close to the modal value as appropriate. That judgment should be clarified to explain why it dismissed significant periods of time	It is the Applicant's position that a modal value is typical, unless it is far removed from the median, in which case a value closer to the median is selected as typical. This means that significant periods, either where levels are higher or lower, are not dismissed.

			where background levels are significantly lower.	
SLD-016	REP2-039 §SLD-225	Applicant's Response to Written Representations	4.1.16. SLD's expert selected the value of 30dB because, in his professional judgement, it would be an appropriate level to select (it is not the lowest level, but representative of the range of lower levels which commonly occur), given the range of background levels, and the relative short term monitoring dataset, including to reduce the uncertainty of the assessment outcome and conclusions. The Applicants sel ection introduces significant uncertainty, as for 50% of the time, the impact would be greater than indicated.	This position does not align with guidance in BS 4142. While a range of L_{A90} values may be observed across a dataset, the selection of a lower value within that range does not inherently make it more representative of typical background conditions. Rather, it risks biasing the assessment toward less frequent, quieter periods. The suggestion that the Applicant's approach introduces "significant uncertainty", on the basis that impacts would be greater for 50% of the time, conflates different statistical concepts. The L_{A90} descriptor already represents the level exceeded for 90% of the time within each measurement period. So differences between L_{A90} values across the dataset reflect changes in prevailing conditions, rather than uncertainty in the metric itself. Accordingly, selecting an L_{A90} value that reflects the typical range of background sound levels within the dataset provides a more robust representation of prevailing conditions than selecting a lower value from the observed range.

SLD-017	REP 2-039, §SLD-227	Applicant's Response to Written Representations	4.1.17. The Applicant's response suggests that the Applicant did not have a dedicated weather station in place for the operational noise surveys, nor did they undertake a review to identify periods of adverse/unsuitable weather conditions. Their quote regarding their review of one specific period was: "Based on the information from local weather stations".	The Applicant acknowledges that a weather station was only in place at the time of the surveys along the cable route corridor. A review of weather information has been undertaken and does not change the outcomes of the assessment as stated in in the **Applicant's Response to Written Representations [REP2-039]**, item SLD-227.
SLD-018	REP 2-039,§SLD-227	Applicant's Response to Written Representations	4.1.18. This is contrary to the Environmental Statement Volume 3, Appendix 14-3 Baseline Noise Survey [APP-236], which states at para 1.3.2 *"A weather station was set up to capture the weather data for the Solar PV Sites allowing for any periods of adverse weather conditions to be identified and omitted from further analysis."*	This is acknowledged as an error in **Appendix 14-3 Baseline Noise Survey [APP-236]**, paragraph 1.3.2. The weather station was only in place for the cable route corridor survey.

SLD-019	REP 2-039, §SLD-229	Applicant's Response to Written Representations	4.1.19. The Applicant's acceptance is noted. Thus, the evidence collected is wholly unrepresentative of locations away from local roads (as SLD identified in its submission).	Local roads are not heavily trafficked, so wholly unrepresentative is an exaggeration, but nevertheless it is acknowledged that there will be locations in the local area with sounds levels similar to those measured at LT3.
SLD-020	REP 2-039 §SLD-230	Applicant's Response to Written Representations	4.1.20. The value for moderate annoyance is not applicable as it fails to take into account the existing natural soundscape compared to the higher level of industrial noise to be introduced. It fails sufficiently to take into account the use of such routes, and while it may not make the routes unusable, there should be proper assessment of the effects. ExAQ NV1.9 is also noted in this respect.	The Applicant refers to their response provided in the Applicant's Response to the **Examining Authority's First Written Questions [REP3-128]** at item NV1.9 for a summary of the position.
SLD-021	REP 2-039 §SLD-234	Applicant's Response to Written Representations	4.1.21. SLD's expert considers a comparison to a whisper or refrigerator is inapposite because it fails to reflect the fact that the sound is constant. Someone whispering in a	No analogy is perfect; however, a refrigerator operates continuously, and its noise emissions are not regarded as having a significant adverse effect on health or quality of life. The SLD position is, in essence, that significant adverse effects on health and

			person's ear constantly, however quietly, would be considered highly intrusive and annoying. SLD's view remains that the level set is not appropriate. The approach adopted by the Applicant does not properly reflect the standard and fails in both avoidance but also mitigating to a proper LOAEL level.	quality of life should be identified at external noise levels below 35 dB. In this context, BS 8233 sets an internal daytime design target of 35 dB for good resting conditions within a dwelling. A noise level of this magnitude would not correspond with the behavioural responses associated with exceeding the SOAEL, as defined in Planning Practice Guidance (Noise), as: "*avoiding certain activities during periods of intrusion; where there is no alternative means of ventilation, having to keep windows closed most of the time because of the noise*."
SLD-022	REP 2-039 §SLD-235	Applicant's Response to Written Representations	4.1.22. SLD's expert notes that the fixed threshold noise level is not relied on during the daytime, as the Applicants selected value is not reflective of the lower background levels which regularly occur. This supports rather than detracts from the point made by SLD.	As outlined in responses above, the Applicant's selected value is a representative level exceeded 90% of the time, and a typical background level.
SLD-023	REP 2-039 §SLD-237	Applicant's Response to	4.1.23. This clarifies that the Applicant's approach has dissociated the likely	It is not a departure, as explained in the **Applicant's Response to Written Representations [REP2-039]**, item SLD-233, it

		Written Representations	significant effects of annoyance due to audibility and change to the existing sound climate as determined by BS4142. That is a departure from the British Standard for the reasons Mr MacArthur identifie d in his report. BS8233 relates to anonymous traffic /transportatio n noise, not industrial noise, and is not appropriate for comparison in any event.	is a correct interpretation of the standard in line with national policy. In contrast the SLD approach is to take one aspect of BS 4142 to an absolute extreme, while simultaneously ignoring all evidence on levels that give rise to significant health effects. Additionally, BS 8233 clearly also relates to industrial noise, as it is referenced explicitly with regards to internal levels, particularly at night, within BS 4142 itself.
SLD-024	REP 2-039 §SLD-242	Applicant's Response to Written Represent ations	4.1.24. SLD's expert remains of the view that the assessment is not robust. Among other things, large uncertainty remains in background noise levels due to the approach adopted. That an approach that is not robust has been accepted elsewhere does not justify the flaws that are identified.	The Applicant stands by the approach adopted (missing weather station aside, although this has no bearing on the final outcome), for the reasons outlined above and in the **Applicant's Response to Written Representations [REP2-039]**.
Flooding				

SLD-025	REP 2-039, §SLD-251	Applicant's Response to Written Representations	4.1.25. SLD note that the Applicant has used the Exception Test. The suggestion that the Sequential Test has not been failed where the Applicant has moved on to the Exception Test is not understood; the Exception Test is only applicable where the Sequential Test cannot deliver an acceptable site.	The Applicant does not agree with SLD's characterisation of the Sequential Test and Exception Test position. The Sequential Test is addressed in the Planning Statement, with the flood risk evidence provided through the **Flood Risk Assessment and Drainage Strategy** suites. The use of the Exception Test does not mean that the Sequential Test has "failed" in the way suggested by SLD. The Sequential Test ensures that a sequential, risk-based approach is followed to steer new development to areas with the lowest risk of flooding as set out in NPS EN-1, paragraph 5.8.21. NPS EN-1 paragraph 5.8.9 states that if, following the application of the Sequential Test, it is not possible (taking into account wider sustainable development objectives), for the project to be located in areas of lower flood risk, the Exception Test can be applied. To satisfy the Exception Test, it should be demonstrated that the project would provide wider sustainability benefits to the community that outweigh flood risk; and the project would be safe for its lifetime, and would not increase flood risk elsewhere (NPS EN-1 paragraph 5.8.11).

				The Scheme has applied a sequential approach to siting. The majority of the Scheme is within Flood Zone 1. The BESS and substations have been sequentially located in Flood Zone 1 where practicable. The limited interaction with Flood Zones 2 and 3 is principally associated with solar PV infrastructure at Lime Down D, in the vicinity of the Gauze Brook floodplain, and Lime Down E2, in the vicinity of Gabriel's Well and associated watercourse corridors. Those interactions are limited and have been assessed through the submitted site-specific FRA appendices. Further hydraulic modelling has been undertaken for Gauze Brook, and further modelling has been progressed for Lime Down E2 to support the delineation of flood extents and Flood Zone 3b where relevant. This further work supports, rather than undermines, the Applicant's risk-led approach. Where limited solar PV infrastructure interacts with areas of flood risk, that infrastructure is flood-compatible, elevated, and subject to embedded mitigation and detailed design controls. Sensitive infrastructure has been located outside the higher-risk flood extents where practicable.

				The wider sustainability benefits of the Scheme and how the Scheme is safe for its lifetime, without increasing flood risk elsewhere and reducing flood risk overall is set out in Annex C: Sequential and Exception Test to the **Planning Statement [REP3-081]**. The Applicant therefore considers that the Sequential Test and Exception Test position is robust and policy-compliant.
SLD-026	REP 2-039, §SLD-255	Applicant's Response to Written Representations	4.1.26. Without repeating all of the disagreement, among other things the Applicant fails to engage with the points that (a) the EA notes many episodes of fluvial flooding in the area, while the FRA ignores these and claims that there is no fluvial flooding in the vicinity of the sites and (b) that the Applicant's own modelling shows extreme flow rates in response to a heavy rainfall event, whereas their assessed flood risk is "low".	The Applicant does not accept that the FRA ignores fluvial flooding or historical flood information. All rivers and watercourses are susceptible to flooding during sufficiently large rainfall events. The relevant question for the DCO is not whether watercourses can flood, but whether the Scheme is safe for its lifetime and whether it would increase flood risk elsewhere. That is what the **Flood Risk Assessment and Drainage Strategy** suites assesses. The assessment considers Environment Agency flood mapping, Environment Agency Product Data, local topography, LiDAR, mapped surface water flood risk, watercourse data, historical flood information and, where proportionate,

				hydraulic modelling or Manning's open-channel calculations. The assessment identifies the areas where fluvial flood risk is present, principally at Lime Down D and Lime Down E2, and assesses the implications for the Scheme and for off-site flood risk. The conclusion that flood risk to the Scheme is low, or can be made acceptable, reflects the vulnerability and siting of the proposed infrastructure, the limited interaction with Flood Zones 2 and 3, the elevation of flood-compatible solar PV infrastructure, and embedded mitigation. The modelled flows referred to by SLD are design event flows used to understand flood behaviour in the Gauze Brook catchment. They do not demonstrate that the Scheme would increase runoff rates, flood depths, flood velocities or flood hazard elsewhere. The Scheme has been assessed against the relevant flood extents, and the submitted assessment shows that the Scheme would be safe and would not materially contribute to off-site flooding.
SLD-027	REP 2-039, §SLD-256	Applicant's Response to	4.1.27. The Applicant fails to engage with the criticisms of the FRA methodology. Further,	The Applicant does not accept that it has failed to engage with the methodology criticisms. These points have been addressed in the

		Written Representations	the Applicant notes that Appendix F3 provides "qualitative photographic evidence of flooding within the known Gauze Brook floodplain during Storm Bert", and claims that it is consistent with their assessment. Professor Skeffington disagrees.	Applicant's previous responses and in the **Applicant's Response to Lead Local Flood Authority on Hydraulic Modelling Requirements [REP2-045]**. The Applicant's position remains that **Appendix F3 (Observations of Flood Extent above Corston during an Extreme Rainfall Event) [REP1-176]** provides qualitative photographic evidence of flooding within and around the known Gauze Brook floodplain during Storm Bert. The photographs are useful contextual evidence, but they are not a quantitative flood risk assessment. The photographs cannot be accurately or definitively located, time checked, or linked to a verified rainfall event and return period. Even if the broad locations could be confirmed, the photographs do not provide surveyed levels, measured depths, velocity data, hazard ratings, ground levels, blockage information or a reliable flood extent. They therefore do not demonstrate that the Applicant's assessment is wrong. The Applicant's assessment has been produced using national-scale datasets where appropriate, site-specific data where available, and national policy and

				guidance-compliant modelling techniques where proportionate. The quantitative assessment remains the appropriate basis for assessing flood risk, floodplain interaction and potential off-site impacts.
SLD-028	REP 2-039,§SLD-256	Applicant's Response to Written Representations	4.1.28. It is acknowledged that *"the photographs do not provide surveyed levels, measured depths, velocity data or hazard ratings. The water is turbid, the ground surface cannot be seen, and the views are oblique".* The purpose of the photograph was to illustrate that the extent of flooding was greater than the Applicant would have predicted, and that this should generate concerns about depths and velocities.	The Applicant notes SLD's explanation of the purpose of the photographs. The Applicant does not agree that the photographs demonstrate that flood extents were greater than predicted by the Applicant's assessment. The photographs are oblique views taken during a storm event. They cannot be accurately or definitively located, time checked, or used to identify the flood extent. They do not identify the rainfall return period, rainfall distribution, antecedent conditions, blockage conditions, ground levels, flood depths, velocities or hazard ratings. The photographs show that flooding occurred in the Gauze Brook catchment during Storm Bert. That is not disputed. All watercourses are susceptible to flooding during sufficiently large rainfall events, and the Gauze Brook floodplain is recognised within the Applicant's assessment as the principal area of fluvial flood interaction at Lime Down D.

				The photographs are therefore useful qualitative evidence, but they are not proof that the Applicant's assessment is wrong. They do not replace the submitted flood risk assessment, hydraulic modelling or Environment Agency flood datasets used in accordance with relevant policy and guidance. They also do not demonstrate that the Scheme would increase flood risk elsewhere.
SLD-029	REP 2-039, §SLD-257	Applicant's Response to Written Representations	4.1.29. The Applicant recognises in general terms many of the risks associated with issues like soil compaction due to construction. But it has undertaken no assessment of the magnitude of those risks. Though SLD agrees that the purpose of the FRA is not to resolve existing flooding, a study of the present response to rainfall of the catchment, as expressed in the hydrographs from the Gauze Brook, shows that the area is surprisingly sensitive to heavy rainfall. That should be taken into account in	The Applicant does not agree that construction-stage runoff risk has been left as an unspecified matter. Construction-stage soil compaction and runoff risk have been identified as key risks and are controlled through the **Outline CEMP [REP3-092]** and **Outline SRMP [REP3-098]**. Those controls include soil handling restrictions, trafficking controls, temporary drainage, protection of existing drainage features, management of exposed ground, sediment control, monitoring, remedial loosening where required, and preparation of a Water Management Plan as part of the detailed CEMP. The Applicant has not assumed that an unspecified amount of runoff management will be sufficient. The submitted management plans

			the FRA, rather than assuming that an unspecified amount of runoff management would be sufficient for mitigation.	establish the required controls, performance outcomes and approval process. The detailed CEMP will apply those controls to the contractor's final programme, working areas, compounds, haul routes, phasing and receptors. A fixed quantitative construction runoff model for the whole Order Limits would not be representative. Construction will be phased, the whole site will not be stripped or disturbed at one time, and temporary drainage catchments will change during construction. The appropriate control is therefore a secured Water Management Plan and detailed CEMP, not a single static model of a temporary and changing construction condition. The Gauze Brook catchment response has been considered through the Lime Down D flood risk assessment and hydraulic modelling. That does not mean that field-scale modelling of all panelled areas is necessary or proportionate.
SLD-030	REP 2-039, §SLD-258	Applicant's Response to Written Representations	4.1.30. In its response, the Applicant purports to explain their assessment of fluvial flood risk as "low". However, it is not explained how the range of factors allegedly considered	The Applicant does not accept SLD's criticism of the Manning's open-channel calculations. The Manning's calculations are not presented as full dynamic hydraulic models. They are proportionate level and conveyance checks for smaller ordinary watercourses and drainage

			leads to this conclusion. It is stated that *"the Manning's/open-channel calculations have been mischaracterised. They are local level and conveyance checks for minor watercourses, not predictions of downstream flood hydrographs at Corston, Malmesbury or other settlements."* SLD's criticism is based on the quality of the Mannings modelling for minor watercourses, pointing out that it is (a) not credible, and (b) would lead to the conclusion that flood risk is far from low. There is no suggestion that the aim is to generate flood hydrographs downstream, though this is something the Applicant should also be doing.	features where detailed hydraulic modelling is not required. They sit alongside the wider evidence base, including LiDAR, topographic review, Environment Agency flood datasets, mapped surface water flood risk, Environment Agency Product Data, site-specific hydraulic modelling at Lime Down D and further modelling at Lime Down E2. This position is also supported by the Environment Agency's latest response. In relation to the impacts of solar panel support frames on flood flow conveyance at Lime Down D and Lime Down E2, the Environment Agency notes that the Applicant's position is generally supported by the sensitivity testing on Manning's roughness within the hydraulic model, while reserving its final position pending review of the model files. That is important because the statutory technical consultee has not taken SLD's position that the Applicant's methodology is inherently unreliable. The assessment of fluvial flood risk as low or acceptable does not mean that no watercourse can flood. All rivers and watercourses can flood in large storm events. The risk rating reflects the location, vulnerability and design of the proposed infrastructure, including the siting of sensitive

				infrastructure away from higher-risk areas where practicable and the use of elevated, flood-compatible solar PV infrastructure where limited flood interaction remains. SLD also suggests that the Applicant should be producing downstream flood hydrographs at Corston, Malmesbury or other settlements. That is not necessary to assess the Scheme's effect. In simple terms, a downstream hydrograph would be needed if the Scheme was changing the amount or speed of water leaving the site in a way that could affect downstream communities. The Scheme does not do that. The panelled areas remain permeable and drain to ground, rather than to a sealed drainage network. Formal impermeable infrastructure is drained, attenuated and controlled where required. The assessment therefore focuses on whether the Scheme changes flood pathways, floodplain storage or connected runoff. It does not identify a material increase in off-site flood risk.
SLD-031	REP 2-039, §§SLD-261 and SLD-262	Applicant's Response to Written Representations	4.1.31. SLD has never suggested the land should be treated as impermeable hard standing. The issue is whether the soil can cope with the	The Applicant notes SLD's clarification that it does not say the whole panelled area should be treated as impermeable hardstanding. The Applicant's disagreement is with SLD's

			concentrated runoff even if vegetated. The Applicant still has not demonstrated this, nor properly engaged with the literature on run-off effects. The Applicant notes correctly that this “does not demonstrate a material increase in storm runoff, peak discharge, flood depth or flood hazard”. To do this would require access to a sophisticated flood model. It is notable that the Applicant has not investigated storm runoff and peak discharge either. The Applicant details the major factors affecting flood risk during storm events – of these it is “antecedent conditions” that provide the mechanism which drives increased flood risk. Wetter soils, or soils that are saturated for longer, will increase runoff through the saturation excess overland	conclusion that field-scale hydraulic modelling is therefore required. The submitted assessment recognises that solar PV panels can redistribute rainfall locally, including at drip lines. That local redistribution does not, in itself, create a material increase in runoff at the field boundary. Whether any local redistribution becomes a flood risk issue depends on ground cover, soil condition, compaction, slope, surface roughness and hydrological connectivity. SLD also appears to underestimate the current baseline condition of parts of the panelled areas. Existing agricultural land is not a perfect hydrological baseline. Arable land can include tramline compaction, seasonally bare soil, poor rooting structure, low vegetation cover after harvest or cultivation, soil disturbance, field drainage and rapid runoff pathways. The Scheme would replace much of that condition with managed grassland and secured soil and vegetation management controls. Those matters are addressed through the Scheme design and secured management measures, including the **Outline CEMP [REP3-092]**, **Outline SRMP [REP3-098]**, **Outline LEMP**

			flow mechanism. The Applicant has failed to assess this.	**[REP3-100]**, **Outline OEMP [REP3-094]** and detailed drainage design under Requirement 11: Surface Water Drainage of the **Draft DCO [REP3-005]**. Antecedent conditions are relevant to runoff generation, but they do not demonstrate that panelled areas will materially increase peak discharge, flood depth or flood hazard. The key issue remains whether rainfall is converted into connected runoff reaching a downstream receptor. The Applicant's assessment is that, with the embedded controls, the panelled areas will continue to drain diffusely to ground and will not operate as connected impermeable catchments.
SLD-032	REP 2-039, §SLD-269	Applicant's Response to Written Representations	4.1.32. SLD would welcome clarity on how the discussion of panel heights in Flood Zones 2 and 3 interact with the maximum parameters for the Proposed Development. At [REP1-048] §2.3.13 it is explained that "*for both fixed and tracker panels, all sensitive and electrical equipment mounted on the Solar PV Panels will be elevated by the*	The Applicant confirms that the stated maximum parameters for fixed and tracker panels cannot be exceeded. The requirement for sensitive and electrical equipment mounted on the solar PV panels to be elevated with appropriate freeboard is achieved through the detailed arrangement of the panel frame, legs and mounted equipment within the authorised design parameters. It does not require the whole solar PV panel structure to be raised above the maximum parameters.

			supporting legs or frame so that it is no less than 0.6 meters above the design flood level, including the appropriate climate change allowance". Upstream of Corston the Gause Book shows flood depths of up to 0.3m and Rodbourne Brook of 0.6m. It is unclear how the Applicant accounts for these flood depths and elevations within the existing maximum parameters for the solar panels (of 4.5m for tracker panels and 3.5m for fixed panels), or whether in fact this would call for maximum heights apparently in excess of the parameters.	If, in a specific location, the required elevation could not be achieved within the maximum parameters, the detailed layout would need to be adjusted. The Applicant could not simply exceed the authorised maximum height. In practical terms, that means equipment would be microsited, repositioned or excluded from that specific flood-affected location rather than breaching the maximum parameters. Where solar PV infrastructure is located within areas of flood interaction, the detailed layout and equipment arrangement will ensure that sensitive electrical components are appropriately elevated above the design flood level, including the relevant climate change allowance. This is secured through the detailed design controls in the **Draft DCO [REP3-005]** and the embedded flood risk principles set out in the **Flood Risk Assessment and Drainage Strategy** suites.
SLD-033	REP2-039 §§SLD-266 and 267	Applicant's Response to Written Representations	4.1.33. SLD notes that the Applicant does not challenge the basic premise of the position set out, which is that reduced evaporation will lead to an increase in water runoff from the site. That would be contrary	The Applicant does not accept SLD's conclusion that reduced evaporation would lead to a material increase in flood risk off-site. For design flood events, the dominant drivers are rainfall amount, rainfall intensity, rainfall duration, catchment wetness, soil condition, slope, surface roughness and hydrological connectivity.

			to the requirement in NPS EN-1 not to increase the flood risk off site. The Applicant notes correctly that this "does not demonstrate a material increase in storm runoff, peak discharge, flood depth or flood hazard". To do this would require access to a sophisticated flood model. It is notable that the Applicant has not investigated storm runoff and peak discharge either. The Applicant details the major factors affecting flood risk during storm events – of these it is "antecedent conditions" that provide the mechanism which drives increased flood risk. Wetter soils, or soils that are saturated for longer, will increase runoff through the saturation excess overland flow mechanism. The Applicant has failed to assess this.	Evaporation and evapotranspiration losses during the critical storm period are small compared with the volume of rainfall falling during a flood-producing event. They may be relevant to longer-term water balance, but they are not the primary control on peak flood runoff during an extreme storm. The relevant flood risk question is whether the Scheme would materially increase connected runoff rates, runoff volumes, flood depths or flood hazard at downstream receptors. That has been assessed through the **Flood Risk Assessment and Drainage Strategy** suites. Panelled areas are not connected impermeable drainage catchments. Rainfall continues to drain to ground beneath and between panels. Formal impermeable infrastructure is subject to attenuation, treatment and controlled discharge where required. Construction-stage compaction and soil condition are controlled through the **Outline CEMP [REP3-092]** and **Outline SRMP [REP3-098]**. The Applicant therefore does not agree that the Scheme would conflict with the NPS EN-1 requirement not to increase flood risk elsewhere.

SLD-034	REP 2-045, Introduction	Applicant's Response to LLFA on Hydraulic Modelling Requirements	4.1.34. SLD agrees with the LLFA that full field-scale hydrological modelling is necessary for the panel areas at Lime Down. SLD disagrees with the Applicant's expert, Arthian, who considers that such modelling is unnecessary and disproportionate.	The Applicant does not agree that full field-scale hydrological or hydraulic modelling of the panelled areas is necessary or proportionate. That position is consistent with the approach agreed in principle with the LLFA before submission. The LLFA agreed that it was not sensible to model the whole site and that targeted modelling should focus on the specific areas where floodplain interaction required further assessment, principally Gauze Brook at Lime Down D. That is the approach the Applicant has taken. Hydraulic modelling has been undertaken for Gauze Brook, further modelling has been progressed for Lime Down E2, and formal impermeable infrastructure is subject to drainage calculations, attenuation and controlled discharge. SLD's position depends on local rainfall redistribution from solar panels being treated as a wider catchment-scale flood risk mechanism. The Applicant does not accept that. The panelled areas are not roofs, yards or sealed hardstanding. They are elevated panels above existing ground. Rainfall would drain to the ground beneath and between the rows. It would not be collected in a sealed drainage system and

				discharged downstream as a new connected catchment. That approach is consistent with NPS EN-3 and the BRE/EA planning guidance quoted in the **ES Volume 3, Appendix 11-1: Flood Risk Assessment and Drainage Strategy Covering Report [RREP3-039]** which recognises that solar panels drain to existing ground and that the drainage impact will not generally be significant. It is also consistent with the evidence reviewed in **Applicant's Response to Lead Local Flood Authority on Hydraulic Modelling Requirements [REP2-045]**. That evidence does not show that raised solar panels intrinsically convert land into an impermeable catchment. It shows that runoff response is principally controlled by ground cover, soil condition, compaction, surface roughness, slope and connectivity. Those are the matters controlled by the Scheme. Construction compaction, soil handling, vegetation establishment, maintenance of ground cover, protection of flow routes and local drainage controls are secured through the **Outline CEMP [REP3-092]**, **Outline SRMP [REP3-098]**, **Outline LEMP [REP3-100]**, **Outline OEMP [REP3-094]** and detailed

				drainage design under Requirement 11: Surface Water Drainage of the **Draft DCO [REP3-005]**. A field-scale model of the panelled areas would not model a fixed impermeable surface or a fixed drainage system. It would depend on assumed future values for vegetation cover, soil compaction, surface roughness, antecedent wetness, maintenance condition and flow connectivity. Those assumptions would drive the result. A model based on bare or compacted ground would model the failure of the secured mitigation, not the Scheme as proposed. A model based on established vegetation would add little unless the relevant ground cover and soil condition were secured, which is exactly what the Applicant has done through the DCO controls. The Applicant has therefore assessed the actual flood risk mechanisms rather than producing a whole-site model of assumed future management conditions. That is the appropriate and proportionate approach.
SLD-035	REP 2-045, Introduction	Applicant's Response to LLFA on Hydraulic	4.1.35. SLD's considers that as a high-risk, large scale development in a flood-sensitive area, Lime	The Applicant does not accept that Lime Down should be characterised as a high-risk development from a flood risk perspective.

		Modelling Requirements	Down requires a detailed, quantitative FRA.	The presence of rivers or watercourses does not, on its own, make a development high risk. All rivers and watercourses are capable of flooding during sufficiently large rainfall events. The flood risk rating must be based on the mapped flood extents, the vulnerability of the proposed infrastructure, the degree of interaction with flood risk areas, the potential for off-site effects, and the mitigation secured. On that basis, the Applicant's risk ratings are consistent with standard flood risk guidance and policy. The majority of the Scheme is within Flood Zone 1. The principal fluvial flood interactions are limited and have been assessed, particularly at Lime Down D and Lime Down E2. Sensitive infrastructure, including the BESS and substations, has been sequentially located in Flood Zone 1 where practicable. The FRA is detailed and quantitative where the risk mechanism requires it. That includes hydraulic modelling at Gauze Brook, further modelling at Lime Down E2, quantitative drainage calculations for formal impermeable infrastructure and floodplain displacement calculations where floodplain interaction occurs. It is not necessary or proportionate to apply full field-scale dynamic modelling to panelled areas

				which remain permeable and are not connected to a sealed drainage system.
SLD-036	REP 2-045, §2.2	Applicant's Response to LLFA on Hydraulic Modelling Requirements	4.1.36. Arthian point out several times that EN-1 paragraph 5.8.15 requires the FRA to be "proportionate to the risk and appropriate to the scale, nature and location of the project." They claim that their approach meets these criteria. However: • this is a very large-scale project involving extensive engineering on 748 ha of panel areas plus large amounts of associated infrastructure in a scheme envelope of about 46 km2 plus a 22 km cable route; • the nature of the project is that it will increase runoff rates and amounts and thus increase flood risk; and	The Applicant does not accept SLD's conclusion that the scale, nature and location of the Scheme require field-scale hydraulic modelling of all panelled areas. The Applicant acknowledges that the Scheme is large. However, scale alone does not determine the modelling requirement. The relevant considerations are the nature of the infrastructure, its hydrological connectivity, the vulnerability of receptors, and the mechanisms by which flood risk could be changed. The panelled areas do not form connected impermeable catchments. Rainfall will continue to drain to ground beneath and between arrays. The associated formal impermeable infrastructure is limited relative to the overall Order Limits and will be drained, attenuated and controlled where required. The Scheme is also not wholly located in a high flood risk area. The majority is in Flood Zone 1, with limited Flood Zone 2 and 3 interaction mainly at Lime Down D and Lime Down E2. It is not clear how the modelling requested by SLD would provide a more robust answer than

			• the project is proposed in an area of high flood risk with significant implications for communities both on-site and downstream. This is thus a high risk, large-scale project in a sensitive area and a proportionate FRA would therefore need to be detailed, quantitative and consider all aspects of flood generation.	the assessment already undertaken. Any field-scale model of the panelled areas would depend on assumed future vegetation cover, soil condition, compaction, roughness, maintenance and antecedent conditions. Those matters are not fixed engineering parameters. They are controlled through the certified outline management plans and DCO requirements. The Applicant's approach is therefore proportionate to the scale, nature and location of the Scheme. It is detailed and quantitative where required but does not apply unnecessary modelling to areas where that modelling would not provide a reliable or useful assessment of Scheme effects. This position is set out in more detail in the **Applicant's Response to Lead Local Flood Authority on Hydraulic Modelling Requirements [REP2-045]**.
SLD-037	REP 2-045, §2.2	Applicant's Response to LLFA on Hydraulic Modelling Requirements	4.1.37. The Applicant states (§2.2.4) that "EN-1 Section 5.8 does not prescribe any specific assessment methodology" (such as hydraulic modelling), which is correct. However, it also states (at §5.8.15) that "as a minimum" the FRA should "consider and quantify the	The Applicant does not accept that NPS EN-1 requires dynamic modelling across the panelled areas. NPS EN-1 requires the FRA to be proportionate to the risk and appropriate to the scale, nature and location of the project. It does not prescribe dynamic hydraulic modelling as the required method for every part of a site.

			different types of flooding (whether from natural and human sources and including joint and cumulative effects) and include information on flood likelihood, speed-of-onset, depth, velocity, hazard and duration". The Applicant has considered the different types of flooding and quantified them to some extent, and provided information on likelihood and depth, though mostly round their own assets. But there is nothing on speed-of-onset, velocity and duration, and no way to produce this information without doing some dynamic modelling. Thus, dynamic modelling is required f or Lime Down.	The **Flood Risk Assessment and Drainage Strategy** suites considers the relevant flood sources and provides quantitative information where it is needed to understand risk, including flood likelihood, depth, flood extent, floodplain interaction, drainage rates and attenuation requirements. Where more detailed hydraulic modelling is justified, it has been undertaken or progressed, including for Gauze Brook and Lime Down E2. For smaller watercourses and panelled areas that remain permeable, dynamic modelling would not be a proportionate or reliable way to assess Scheme effects. SLD has not explained how a dynamic field-scale model of panelled areas would produce a better or more reliable answer than the current risk-led assessment. Such a model would still require assumed values for vegetation, soil condition, compaction, roughness, antecedent conditions and flow connectivity. The key control is that the Scheme does not materially alter connected runoff pathways or convert panelled areas into connected impermeable catchments. That is why the Applicant's assessment focuses on flood extents, floodplain interaction, drainage controls

				for formal impermeable infrastructure, construction soil management and maintenance of established flow routes. The Applicant's position is set out in further detail in **Applicant's Response to Lead Local Flood Authority on Hydraulic Modelling Requirements [REP2-045]**.
SLD-038	REP 2-045, §2.2	Applicant's Response to LLFA on Hydraulic Modelling Requirements	4.1.38. SLD considers that the Applicant has failed to justify why it does not need to undertake further modelling in respect of solar panel runoff. It is noted that paragraph 2.10.84 of EN-3 provides that "in general", this will not be necessary. However, the Applicant has not addressed why the case is a general one. As described in Appendix F2 of SLD's Written Representation, the nature of the soils and geology at Lime Down leads to low infiltration rates and rapid runoff under flood conditions, producing the flood proneness that so concerns members of the public.	The Applicant does not agree with SLD's comment. The need for further modelling of solar panel runoff is addressed directly in the **Applicant's Response to Lead Local Flood Authority on Hydraulic Modelling Requirements [REP2-045]**. NPS EN-3 paragraph 2.10.84 recognises that, in general, solar PV panels will not increase runoff because they are raised above the ground and rainwater drains to the ground beneath and between the panels. The Applicant considers that Lime Down falls within that general position. The panelled areas would not operate as roofs, sealed yards or hardstanding. They would not collect runoff into a positive drainage system and discharge it downstream. Rainfall would continue to drain to ground beneath and between the rows.

				The Applicant recognises that local soils and geology are relevant to runoff response. Those matters have not been ignored. They form part of the existing baseline and part of the construction and operational risk profile. The relevant question is whether the Scheme would materially worsen that runoff response or create a new connected pathway to downstream receptors. That has been assessed through the **Flood Risk Assessment and Drainage Strategy** suites, which considers flood extents, watercourses, ditches, topography, overland flow routes, drainage pathways, formal impermeable areas and receptors. Hydraulic modelling has been undertaken where there is a defined floodplain interaction, including Gauze Brook, and further modelling has been progressed for Lime Down E2. Formal impermeable infrastructure is subject to attenuation and controlled drainage. The soils and geology do not, on their own, create a requirement to model all panelled fields. The key variables for panelled-area runoff are future vegetation cover, soil condition, compaction, surface roughness, antecedent wetness, maintenance condition and flow connectivity. Those are not fixed design parameters. They are controlled through

				the **Outline CEMP [REP3-092] Outline SRMP [REP3-098]**, **Outline LEMP [REP3-100]**, **Outline OEMP [REP3-094]** and detailed drainage design secured by Requirement 11: Surface Water Drainage of the **Draft DCO [REP3-005]**. A field-scale model would therefore depend on assumptions about future managed conditions. The Applicant does not consider that this would provide a more reliable assessment than securing the relevant outcomes through the DCO and applying targeted modelling where there is a defined floodplain or drainage interaction. **SLD's Appendix F2 (Runoff from solar panels) [REP1-175]** may describe existing catchment sensitivity to runoff, but it does not demonstrate that the Scheme would materially increase off-site flood risk or that full field-scale modelling is required.
SLD-039	REP 2-045, §3.2	Applicant's Response to LLFA on Hydraulic Modelling Requirements	4.1.39. In Sections 3.2 and 3.3, Arthian provide for the first time a rationale for their assessment of runoff from panel areas.	The Applicant does not accept that the rationale for assessing runoff from panelled areas was provided for the first time in **Applicant's Response to Lead Local Flood Authority on Hydraulic Modelling Requirements [REP2-045]**.

				The submitted **Flood Risk Assessment and Drainage Strategy** suites and **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP3-015]** already distinguish between panelled areas, formal impermeable infrastructure and controlled drainage areas. The **Applicant's Response to Lead Local Flood Authority on Hydraulic Modelling Requirements [REP2-045]** consolidates that position and responds directly to the LLFA's post-submission modelling request. The assessment approach was also discussed with the LLFA and the Environment Agency before submission. No requirement for field-scale hydraulic modelling of all panelled areas was raised by either body at that stage. The Applicant understood the risk-led approach to be accepted in principle. The LLFA's subsequent request for further field-scale modelling is therefore a change in position raised after submission, rather than a matter that the Applicant failed to address during preparation of the application. The Applicant also notes that SLD says the Applicant has not engaged with its points. The Applicant does not accept that. The Applicant has provided a detailed technical rebuttal

				in **Applicant's Response to Lead Local Flood Authority on Hydraulic Modelling Requirements [REP2-045]**. SLD's current response does not materially engage with the central point in that rebuttal, namely that field-scale modelling of panelled areas would be based on assumptions about managed future soil and vegetation conditions and would not provide a more reliable assessment of off-site flood risk.
SLD-040	REP 2-045,§3.2	Applicant's Response to LLFA on Hydraulic Modelling Requirements	4.1.40. The paper identifies four factors that determine whether redistributed rainfall will generate increased runoff. The following comment is provided in respect of each:	The Applicant notes that SLD-040 introduces its response to the four factors identified in **Applicant's Response to Lead Local Flood Authority on Hydraulic Modelling Requirements [REP2-045]**. The Applicant responds to those specific points in SLD-041 to SLD-044 below. The Applicant's overall position remains that rainfall redistribution from panels only becomes a flood risk issue if it results in a material increase in connected runoff to downstream receptors. That is not predicted to occur with the embedded design and management controls proposed. The Applicant also notes that SLD does not appear to engage with the central technical point in the **Applicant's Response to Lead Local**

				Flood Authority on Hydraulic Modelling Requirements [REP2-045]. The issue is not whether rainfall can be redistributed locally by panels. The issue is whether that redistribution creates a connected flood risk pathway and a material off-site increase in flood risk. The Applicant's assessment shows that it does not.
SLD-041	REP 2-045,§3.2	Applicant's Response to LLFA on Hydraulic Modelling Requirements	4.1.40.1. Ground Cover Condition: This is indeed vital and generally agreed. But it still needs to be demonstrated that (a) the vegetation established under the panels will be sufficient to absorb the drip-line energy and (b) whether the vegetation will survive under the panels, given that it is a stressed environment, short of water and sunlight. It would also rule out grazing as a management option unless the under-panel areas could be fenced off. At Lime Down, drip-line energy needs to be assessed given the large size of the panels proposed to be used.	The Applicant agrees that ground cover condition is important. The Applicant does not agree that this requires field-scale hydraulic modelling. The flood risk issue is not whether under-panel vegetation has the same species diversity or growth characteristics as open grassland. The relevant issue is whether there is sufficient functional ground cover, soil protection and surface roughness to avoid concentrated connected runoff and erosion. That is addressed through the **Outline LEMP [REP3-100]**, **Outline OEMP [REP3-094]**, **Outline SRMP [REP3-098]** and detailed management controls. The Applicant does not accept that grazing is ruled out as an operational management option. Grazing, mowing or other vegetation management can be adapted to maintain ground cover and avoid localised degradation. The final operational approach will need to maintain the

				secured landscape, ecology and drainage outcomes. Panel size and drip-line effects have been considered as part of the runoff mechanism. They do not, on their own, demonstrate a material increase in flood risk at the field boundary. The current baseline also includes agricultural land that can be subject to tramline compaction, bare soil, poor rooting conditions and seasonal disturbance. The Scheme introduces secured management controls to maintain functional ground cover and manage soil condition.
SLD-042	REP 2-045,§3.2	Applicant's Response to LLFA on Hydraulic Modelling Requirements	4.1.40.2. Soil Structure and Compaction: This is agreed, though the intrinsic characteristics of the soil are also important here. Some soils have low infiltration capacity even before compaction due to construction. Resistance to compaction and recovery potential from compaction are important factors which vary widely across soil types. For this reason, a soil assessment is needed before	The Applicant agrees that soil structure and compaction are important. The Applicant does not accept that no soil assessment has been undertaken or that mitigation has been designed without understanding soil risk. Soils have been assessed through the submitted application material, and soil handling, trafficking, compaction avoidance and remediation are controlled through the **Outline SRMP [REP3-098]** and **Outline CEMP [REP3-092]**. The detailed Soil Management Plan will apply those controls to the final

			designing mitigation measures – which has not been performed at Lime Down.	construction methodology, soil units, working areas and seasonal conditions. From a flood risk perspective, the key point is that soil compaction is identified as a construction-stage risk and is controlled through secured management measures. That is a more reliable control mechanism than field-scale modelling based on assumed future compaction and recovery values. The Applicant also notes that the existing agricultural baseline is not free from compaction or runoff risk. Existing arable operations can create tramline compaction, disturbed soil, bare ground and preferential runoff pathways. The Scheme would introduce a secured soil management framework that is not currently fixed in the same way for baseline agricultural operations.
SLD-043	REP 2-045,§3.2	Applicant's Response to LLFA on Hydraulic Modelling Requirements	4.1.40.3 Flow Connectivity: This is agreed.	The Applicant notes that SLD agrees that flow connectivity is a relevant factor. That supports the Applicant's assessment approach. Local rainfall redistribution beneath or around panels does not become a downstream flood risk unless it forms a connected flow pathway to a receptor. The Scheme design, soil management, ground cover management,

				temporary drainage and detailed drainage design controls are intended to prevent that mechanism occurring. Established overland flow pathways will be maintained, and formal impermeable infrastructure will be drained, attenuated and controlled where required under Requirement 11: Surface Water Drainage of the **Draft DCO [REP3-005]**. This is also why field-scale modelling of all panelled areas is not necessary. The relevant question is whether a connected pathway is created or materially worsened. The Applicant's assessment and secured controls address that pathway directly.
SLD-044	REP 2-045,§3.2	Applicant's Response to LLFA on Hydraulic Modelling Requirements	4.1.40.4 Existing Baseline Conditions: This is a description of the known runoff problems due to arable agriculture. However, not all land to be replaced by panels is arable. The Baseline Habitats Maps (Figures 9.1.8 to 9.1.12, [APP-113])) for the solar PV sites give the current land use on a field basis. Of the fields, 65%	The Applicant does not rely on an assumption that all land to be replaced by panels is currently arable. The submitted assessment considers the existing baseline conditions across the Scheme, including land use, topography, watercourses, surface water flow routes and drainage pathways. The Applicant also does not dispute that current land managers may take action to manage runoff or soil condition. However, those existing agricultural practices are not secured mitigation

			are arable, 24% grassland and 11% mixed. Additionally, farmers are aware of these problems and take action to alleviate them, for instance by planting a cover crop if bare ground would otherwise last a significant time, using low pressure tyres to reduce compaction etc. Farmers have a long-term interest in stewardship of their land, and ignoring these problems risks economic damage.	for the purposes of the DCO. Current agricultural land can also include tramline compaction, bare soil, disturbed ground, poor rooting conditions and seasonal loss of cover, all of which can increase runoff and erosion risk. The Scheme would introduce secured construction and operational controls through the **Outline CEMP [REP3-092]**, **Outline SRMP [REP3-098]**, **Outline LEMP [REP3-100]** and **Outline OEMP [REP3-094]**. The comparison is therefore not between unmanaged agriculture and unmanaged solar. It is between the baseline condition and the Scheme with secured mitigation and management controls.
SLD-045	REP 2-045,§3.2	Applicant's Response to LLFA on Hydraulic Modelling Requirements	4.1.41. It is noted that even though these factors are "management-dependent variables" they can still (and should) be modelled.	The Applicant does not agree that the ability to model a variable means that modelling is necessary or proportionate. Vegetation cover, soil condition, compaction, surface roughness and flow connectivity are all relevant to runoff generation. That is why they have been considered in the assessment and secured through the Scheme's construction and operational controls. However, these are not fixed physical parameters in the same way as a culvert size, drainage catchment, outfall rate or

				impermeable area. They are managed conditions. A field-scale model would therefore need to assume what those managed conditions would be across the panelled areas. If poor vegetation cover, compacted soil or connected bare flow paths were assumed, the model would show a worse runoff response. If established ground cover, controlled trafficking, maintained soil structure and broken flow connectivity were assumed, the model would show a different response. The result would therefore be driven by the assumptions selected, not by a fixed feature of the Scheme. The Applicant's approach is to control those variables directly. Construction soil handling, trafficking, temporary drainage, sediment control, remedial loosening, vegetation establishment, ground cover maintenance and protection of existing flow routes are secured through the **Outline CEMP [REP3-092]**, **Outline SRMP [REP3-098]**, **Outline LEMP [REP3-100]** and **Outline OEMP [REP3-094]**. Detailed drainage design for formal impermeable infrastructure is secured through Requirement

				11: Surface Water Drainage of the **Draft DCO [REP3-005]**. This is consistent with the risk-led assessment approach already adopted. Hydraulic modelling has been undertaken where there is a defined floodplain interaction or a need to understand flood levels and flow behaviour, including Gauze Brook, with further modelling progressed for Lime Down E2. It is not necessary to model all panelled areas where the panelled areas remain permeable, are not connected to a sealed drainage system, and the relevant runoff controls are secured through the DCO.
SLD-046	REP 2-045,§3.2	Applicant's Response to LLFA on Hydraulic Modelling Requirements	4.1.42. Additionally, Professor Skeffington notes that there are factors affecting runoff other than those discussed. They include: • Slope angle: Slopes of <5° are generally required to avoid having to institute further measures (see Yavari, R., et al., Minimizing environmental impacts of solar farms: a review	The Applicant notes SLD's comment on slope angle. Slope has been considered through the submitted assessment by reference to LiDAR, local topography, mapped surface water flow routes, watercourses, drainage ditches and downstream receptors. The Scheme does not materially alter the field-scale slopes across the panelled areas. Solar PV panels would be mounted above the existing ground, with rainfall draining to the ground beneath and between rows. The underlying field gradients would therefore remain materially as existing.

			of current science on landscape hydrology and guidance on stormwater management. Environmental Research: Infrastructure and Sustainability, 2022. 2(3): p. 032002 – included at Appendix 2 at the end of this submission). Most if not all areas at Lime Down meet this criterion.	The Applicant also notes that SLD states that most, if not all, areas at Lime Down meet the <5° slope criterion referred to in the Yavari review. This supports, rather than undermines, the Applicant's position that Lime Down does not present an exceptional slope-driven runoff case requiring field-scale hydraulic modelling of the panelled areas. Where localised earthworks or formal infrastructure are proposed, such as substations, BESS, access tracks or associated hardstanding, these are considered separately through the relevant site-specific **Flood Risk Assessment and Drainage Strategy appendices** and will be subject to detailed drainage design where required. Formal impermeable infrastructure will be attenuated and controlled through Requirement 11: Surface Water Drainage of the **Draft DCO [REP3-005]**. On that basis, slope does not provide a basis for the further field-scale modelling requested by SLD.
SLD-047	REP 2-045,§3.2	Applicant's Response to LLFA on Hydraulic	• <u>Orientation of the panels with respect to the slope</u>: Orienting the panels parallel to the slope	The Applicant notes SLD's comment on panel orientation relative to slope. The Applicant understands the concern to be that panel orientation could, in some locations, combine

		Modelling Requirements	should maximise percolation opportunities and reduce runoff. The tracking panels at Lime Down have a fixed N-S orientation irrespective of the slope, and the fixed panels have a fixed E-W orientation irrespective of the slope. This means in most cases that the orientation is sub-optimal, though it is unclear how large an effect this will have.	with slope to encourage local concentration of runoff, with potential for scour, rilling or erosion beneath or downslope of panel rows. The Applicant does not agree that this changes the conclusions of the assessment or gives rise to a need for full field-scale hydraulic modelling of the panelled areas. The concern identified by SLD is a local ground condition and erosion management issue, not evidence that the panelled areas would operate as connected impermeable catchments or materially increase off-site flood risk. The panels would be elevated above ground and would shed rainfall locally to the ground beneath and between rows. There would not be a continuous hard surface running down-slope, and runoff would not be collected into a sealed drainage system and discharged downstream. Any localised tendency for runoff to concentrate at drip lines would be managed through ground cover establishment, soil protection, surface roughness, maintenance of vegetation, remedial reseeding, localised flow spreading or shallow drainage measures where required. This is consistent with the approach set out in the **Applicant's Response to Lead Local**

				Flood Authority on Hydraulic Modelling Requirements [REP2-045]. The relevant controls are ground cover, soil condition, compaction, slope, surface roughness and flow connectivity. Those controls are secured through the **Outline CEMP [REP3-092]**, **Outline SRMP [REP3-098]**, **Outline LEMP [REP3-100]**, **Outline OEMP [REP3-094]** and detailed drainage design under Requirement 11: Surface Water Drainage of the **Draft DCO [REP3-005]**. The underlying field slopes would not be materially altered by the solar PV panels. SLD also acknowledges in SLD-046 that most, if not all, areas at Lime Down meet the <5° slope criterion referred to in the Yavari review. That reduces the potential for panel orientation and slope to combine in the way suggested. The Applicant therefore considers that potential local scour or rilling is appropriately managed through secured construction, soil and vegetation controls, with local drainage or flow-spreading measures where required. It does not demonstrate a material increase in off-site flood risk or justify field-scale hydraulic modelling of all panelled areas.

SLD-048	REP 2-045,§3.2	Applicant's Response to LLFA on Hydraulic Modelling Requirements	• Distance between panel rows: A close distance implies that there is less land available for infiltration. According to Yavari, the US states of Maryland, Rhode Island, North Carolina, Pennsylvania a nd Ohio require the area between panels to be at least equal to the area covered by panels. This is more stringent than Lime Down, where the distance covered by the panels (4.85 m) is almost twice as large as the distance between the panels (2.5m) at minimum spacing. This will reduce the potential for infiltration and increase the shading of the under-panel areas relative to the recommended 1:1 ratio.	The Applicant notes SLD's comment on distance between panel rows. The Applicant does not agree that the cited spacing comparison demonstrates a material flood risk issue or a requirement for field-scale hydraulic modelling. The point appears to assume that the area beneath the panels is removed from the infiltration system, so that only the spacing between rows is available to receive rainfall. That is not correct. The panels are elevated above ground. Rainfall landing on a panel would be redistributed to the ground at the panel edge, not removed from the field or collected into a positive drainage system. The ground beneath and around the panels therefore remains part of the pervious field surface. Panel spacing can affect local shading, vegetation condition and the pattern of rainfall reaching the ground. It does not, by itself, determine runoff volume or flood risk. During the type of rainfall event capable of causing wider flooding, the dominant controls are rainfall intensity and duration, antecedent wetness, soil condition, slope, surface roughness and whether runoff becomes connected to a downstream receptor. If rainfall intensity exceeds

				the local infiltration capacity at a drip line, water would move across adjacent ground as shallow overland flow. It would not become a new piped or channelled discharge simply because panel rows are present. The relevant risk is therefore localised concentration of flow, with potential for minor scour or rilling where ground cover is poor or soils have become compacted. This is a matter of ground condition and ongoing site management, rather than an indication that the panelled areas function as connected impermeable surfaces. It is addressed through measures secured for establishing and maintaining vegetation cover, protecting soils during construction, avoiding and remedying compaction, and implementing localised flow management where necessary. The comparison with selected US state guidance in the Yavari review is not a UK planning policy requirement or drainage design standard for the Scheme. It also does not show that Lime Down would increase off-site flood risk. The Applicant has assessed the relevant runoff mechanism in the **Applicant's Response to Lead Local Flood Authority on Hydraulic Modelling Requirements [REP2-045]** and controls the

				relevant variables through the **Outline CEMP [REP3-092]**, **Outline SRMP [REP3-098]**, **Outline LEMP [REP3-100]**, **Outline OEMP [REP3-094]** and detailed drainage design secured by Requirement 11: Surface Water Drainage of the **Draft DCO [REP3-005]**. On that basis, panel spacing does not provide a basis for concluding that the Scheme would materially increase off-site flood risk or that field-scale hydraulic modelling of all panelled areas is required.
SLD-049	REP 2-045, §3.2.4	Applicant's Response to LLFA on Hydraulic Modelling Requirements	4.1.43. Professor Skeffington does not consider it clear that the proposed mitigation will be effective. For example:	he Applicant notes that SLD-049 introduces the following comments on the effectiveness of the proposed mitigation. The specific points on construction plant and vegetation establishment are addressed in SLD-050 and SLD-051 below. The Applicant does not rely on a single mitigation measure. The approach is based on controlling the relevant runoff mechanisms, including soil compaction, exposed ground, local flow concentration, sediment mobilisation, vegetation cover and connectivity to downstream receptors. Those controls are secured through the **Outline CEMP [REP3-092]**, **Outline SRMP [REP3-098]**, **Outline LEMP [REP3-100]**, **Outline**

				OEMP [REP3-094] and detailed drainage design secured by Requirement 11: Surface Water Drainage of the **Draft DCO [REP3-005]**. The Applicant therefore does not accept that the effectiveness of mitigation is unclear in principle. The relevant controls are identified, secured and capable of being applied through the detailed construction and operational management plans.
SLD-050	REP 2-045, §3.2.4	Applicant's Response to LLFA on Hydraulic Modelling Requirements	4.1.44. Use of "light plant": These specifications are welcome, but "light plant" is a relative term. Equipment capable of carrying large quantities of panels and driving 4 m piles is necessarily going to be heavy enough to induce some soil compaction. Some areas of the site are vulnerable to compaction and difficult to remediate, but there has been no assessment of this.	The Applicant does not rely solely on the use of "light plant" to manage compaction risk. The use of appropriate plant is one part of a wider soil management framework. The Applicant accepts that construction plant, including plant used for panel delivery and piling, has the potential to cause localised soil compaction if poorly managed. That is why construction compaction has been identified as a key risk and is controlled through the **Outline CEMP [REP3-092]** and **Outline SRMP [REP3-098]**. Those controls are not limited to a general reference to "light plant". They include soil handling restrictions, control of trafficking routes, avoidance of unnecessary trafficking, use of suitable low ground pressure plant or ground

				protection where required, restrictions on working in unsuitable soil conditions, inspection of ground condition, temporary drainage and remedial loosening or restoration where compaction occurs. The Scheme also does not require the whole of the panelled area to be stripped, sealed or trafficked as a single construction platform. Works would be phased, with access and trafficking controlled through the detailed CEMP and Soil Management Plan prepared substantially in accordance with the **Outline SRMP [REP3-098]**. The compaction risk is therefore local and manageable, rather than a basis for treating the panelled areas as connected impermeable catchments. The Applicant does not agree that there has been no assessment of this issue. The submitted assessment identifies compaction as the principal construction-stage runoff risk and secures the measures needed to avoid, manage and remedy it. That is a more direct and reliable control than field-scale modelling based on assumed future compaction values.

SLD-051	REP 2-045, §3.2.4	Applicant's Response to LLFA on Hydraulic Modelling Requirements	4.1.45. Planting vegetation: Planting vegetation is necessary but it is not clear whether it will be sufficient given the sensitivity of most of the soils. The issue also is whether this vegetation will survive the stressed environment under the panels, especially in view of the large panel sizes and high panel density which will increase shading and reduce water input under the panels.	The Applicant does not agree that vegetation establishment beneath and around the panels is inherently uncertain or unreliable. The under-panel environment will differ from open grassland, with localised changes in shading and rainfall distribution. That does not mean vegetation cannot establish. The panels are elevated above ground and do not seal the soil surface. Light, rainfall and airflow would still reach the ground beneath and between rows, although conditions would vary locally across the array. This is a normal design and management consideration for solar development. The purpose of the detailed LEMP process is to select and manage the appropriate grassland and planting specification for those conditions. The **Outline LEMP [REP3-100]** secures the framework for vegetation establishment, management, monitoring and remedial action. If areas of poor establishment occur, they can be addressed through reseeding, changes to seed mix, adjustment of cutting or grazing, soil remediation, temporary exclusion of grazing, or other localised management measures.

				The Applicant is not relying on every part of the under-panel area developing the same sward as open grassland. The required outcome is functional vegetation and ground cover sufficient to protect the soil surface and avoid persistent bare or eroding areas. That outcome is capable of being secured and maintained through the detailed LEMP and operational management process. The Applicant therefore does not accept that the potential for local variation in under-panel vegetation establishment undermines the assessment. It is a manageable establishment and maintenance issue, not a basis for concluding that the panelled areas would materially increase off-site flood risk.
SLD-052	REP 2-045, §3.2.4	Applicant's Response to LLFA on Hydraulic Modelling Requirements	4.1.46. Professor Skeffington considers that field-scale modelling is both necessary and would be proportionate to the significance of Lime Down: • A hydraulic model would allow the exploration of the effectiveness of the mitigation measures. The variables do not	The Applicant does not agree that field-scale hydraulic modelling is necessary or proportionate to test mitigation effectiveness for the panelled areas. The question is whether field-scale modelling would provide a proportionate and reliable assessment of the Scheme as proposed. The Applicant does not consider that it would. A field-scale model of panelled-area runoff would require post-development assumptions for

			need to be fixed parameters of the development.	vegetation cover, soil condition, compaction, surface roughness, antecedent wetness and flow connectivity. Those assumptions would materially influence the result. If the model assumes bare or compacted ground with connected flow paths, it would show a worse runoff response. If it assumes managed grassland, controlled trafficking and broken flow connectivity, it would show a different response. The Scheme is not proposed as an unmanaged bare-ground or compacted-soil scenario. The DCO secures the controls needed to avoid that condition. Soil handling, trafficking, compaction avoidance, remedial loosening, temporary drainage, sediment control, vegetation establishment, vegetation maintenance and localised flow management are secured through the **Outline CEMP [REP3-092]**, **Outline SRMP [REP3-098]**, **Outline LEMP [REP3-100]** and **Outline OEMP [REP3-094]**. The panels are also not a new fixed hydraulic system. They are elevated above ground. Rainfall drains to the ground beneath and between rows. The panelled areas are not connected to a sealed drainage network and do not create a defined outfall or new controlled discharge point. The main variables that affect

				runoff from those areas are ground condition and management, not a fixed engineered drainage geometry. The Applicant has used hydraulic modelling where it is the appropriate tool: where there is a defined watercourse, floodplain interaction or hydraulic pathway requiring assessment. That includes hydraulic modelling for Gauze Brook and further modelling progressed for Lime Down E2. Formal impermeable infrastructure is also subject to drainage calculations, attenuation and controlled discharge. The Applicant therefore does not accept that field-scale modelling of all panelled areas would provide a more robust assessment. It would rely on assumed future management conditions for variables that are secured directly through the DCO. The proportionate approach is to model the defined hydraulic risks and secure the ground condition, vegetation and drainage controls that prevent local rainfall redistribution becoming connected off-site runoff.
SLD-053	REP 2-045,§3.2.4	Applicant's Response to LLFA on Hydraulic	• It is right that model outputs are very often sensitive to model assumptions. However,	The Applicant agrees that sensitivity testing can be useful where it is applied to a defined hydraulic system and where the tested parameters can inform a design decision. That is

		Modelling Requirements	analysis of this can tell the modeller which variables are important and require more investigation, and which can take assumed values without affecting the accuracy of the result.	why sensitivity testing has been used where appropriate, including in relation to the Gauze Brook hydraulic modelling, and why further modelling has been progressed for Lime Down E2. The Applicant does not agree that the same approach is necessary or proportionate for all panelled areas. For the panelled areas, the variables identified by SLD are already known to be relevant. Vegetation cover, soil condition, compaction, surface roughness, antecedent wetness and flow connectivity all influence runoff response. A sensitivity test would therefore not identify a new mechanism. It would show that poor ground cover, compacted soils and connected flow paths produce a worse runoff response, while managed ground cover, controlled trafficking and broken flow connectivity produce a better response. That is not in dispute. It is the reason the Applicant has secured controls for soil handling, trafficking, compaction avoidance, remedial loosening, vegetation establishment, maintenance and localised flow management through the **Outline CEMP [REP3-092]**, **Outline**

				SRMP [REP3-098], **Outline LEMP [REP3-100]** and **Outline OEMP [REP3-094]**. Sensitivity testing would only assist if it changed the assessment or identified a required design response. In this case, the required response is already embedded: maintain functional ground cover, avoid and remedy compaction, protect flow routes, prevent persistent bare or eroding areas, and provide local drainage or flow spreading where required. Those outcomes are secured directly through the DCO. The Applicant therefore does not accept that sensitivity testing of field-scale panelled-area runoff would provide a more reliable assessment of off-site flood risk. It would test assumed managed and unmanaged ground conditions rather than a fixed element of the Scheme. The appropriate approach is to secure the managed condition and use hydraulic modelling where there is a defined watercourse, floodplain or drainage interaction.
SLD-054	REP 2-045,§3.2.4	Applicant's Response to LLFA on Hydraulic Modelling Requirements	• The Manning's calculations for minor streams are not credible, as shown in SLD WR, Appendix F1, and in any	The Applicant does not accept SLD's criticism of the Manning's calculations or the suggestion that the assessment relies solely on planting beneath the panels.

				case show that an extreme rainfall event would lead to devastating consequences even in the absence of solar panels. The whole analysis relies on an assumption that planting vegetation under the panels would be sufficient to prevent excess runoff and erosion, with no investigation or evidence supplied that this will be the case.	The Manning's calculations are proportionate conveyance and level checks for minor watercourses and drainage features. They are not presented as full dynamic hydraulic models and are not the sole basis of the FRA. They sit within a wider evidence base that includes Environment Agency flood mapping, surface water flood mapping, LiDAR, topographic review, Environment Agency Product Data, site-specific hydraulic modelling at Gauze Brook and further modelling progressed for Lime Down E2. The Environment Agency's latest response is also relevant. In relation to flood flow conveyance at Lime Down D and Lime Down E2, the Environment Agency notes that the Applicant's position is generally supported by the sensitivity testing on Manning's roughness within the hydraulic model, while reserving its final view pending review of the model files. The statutory technical consultee has not adopted SLD's position that the Applicant's approach is inherently not credible. SLD's statement that an extreme rainfall event could have severe consequences even in the absence of solar panels is a comment on the existing catchment response. It is not evidence of a Scheme effect. All watercourses and

				catchments can flood during sufficiently large rainfall events. The relevant question for the DCO is whether the Scheme would materially increase flood risk elsewhere. The Applicant's assessment does not identify such an increase. The assessment also does not rely solely on planting vegetation beneath the panels. Vegetation establishment is one control, but it sits within a wider framework of soil handling, controlled trafficking, compaction avoidance and remediation, temporary drainage, sediment management, protection of existing flow routes, operational inspection and maintenance, localised flow spreading or shallow drainage where required, and engineered drainage for formal impermeable infrastructure. These controls are secured through the **Outline CEMP [REP3-092]**, **Outline SRMP [REP3-098]**, **Outline LEMP [REP3-100]**, **Outline OEMP [REP3-094]** and Requirement 11: Surface Water Drainage of the **Draft DCO [REP3-005]**. The Applicant therefore does not accept that the assessment depends on an unsupported assumption that planting alone will prevent runoff or erosion. The assessment identifies the

				relevant runoff and erosion mechanisms and secures the controls needed to manage them.
SLD-055	REP 2-45, §5.7	Applicant's Response to LLFA on Hydraulic Modelling Requirements	4.1.47. Arthian note they are unable to find the quoted reference "Burch, T., Armstrong, A. & Maslen, S. (2014) Impact of Solar Parks on Runoff Generation and Associated Land Drainage/Flood Risk Consequences. British Hydrological Society" (included at Appendix 2 at the end of this submission). This was a presentation given to a joint meeting of the British Hydrological Society (BHS) and the Chartered Institution of Water and Environmental Management (CIWEM). The meeting was entitled "Hydrological Impacts of Energy Projects" and was held at CIWEM in London on June 5th 2014. The presentation is well-known for being the first to consider systematically the	The Applicant notes SLD's clarification regarding the Burch, Armstrong and Maslen (2014) presentation and has subsequently found it appended to SLD's submission. The Applicant has reviewed the presentation. It does not change the Applicant's position and does not support the conclusion that solar PV panels intrinsically increase runoff or flood risk. The presentation is better read as identifying the importance of soil condition, construction management and vegetation cover. Those are the same mechanisms identified by the Applicant and secured through the Scheme. The presentation identifies soil degradation and compaction during construction and operation as key risks. It also identifies the potential for drip-line concentration, rivulet formation and local erosion where rainfall sheds from panels onto bare, compacted or poorly vegetated ground. The Applicant does not dispute those mechanisms. They are known local ground condition risks. The Applicant's position is that they do not mean the panelled areas should be

			effects of solar panels on runoff in the UK, and for suggestions as to how to mitigate them. There are also photographs of drip from panel edges, rivulet production, and the effects of badly-managed solar farm construction on an unsuitable site. Until recently, the presentation was available on the BHS website in their series covering past meetings, but unfortunately all but the most recent of these have now been removed.	treated as connected impermeable catchments, and they do not justify field-scale hydraulic modelling of all panelled areas. The distinction is important. The presentation does not show that raised solar panels, with managed ground cover beneath and between rows, would materially increase off-site flood risk. It shows that runoff risk increases where soil condition is poor, vegetation cover is inadequate, construction compaction is not remediated, or runoff pathways become connected. Those are management and maintenance issues, not fixed hydraulic characteristics of the panelled areas. That is the basis of the Applicant's assessment. The panelled areas would remain permeable. Rainfall would drain to the ground beneath and between the rows. Runoff would not be collected into a sealed drainage system and discharged downstream. The relevant controls are therefore soil condition, compaction, vegetation cover, surface roughness and flow connectivity. Those controls are secured through the DCO and the certified outline management plans. Construction soil handling, trafficking controls, compaction avoidance, remedial loosening, temporary drainage and sediment control are

				secured through the **Outline CEMP [REP3-092]** and **Outline SRMP [REP3-098]**. Vegetation establishment, operational maintenance, inspection and remedial management are secured through the **Outline LEMP [REP3-100]** and **Outline OEMP [REP3-094]**. Detailed drainage design for formal impermeable infrastructure is secured through Requirement 11: Surface Water Drainage of the **Draft DCO [REP3-005]**. The Applicant also notes that the presentation is a 2014 conference presentation. It is not a policy requirement, drainage design standard or modelling requirement. It identified evidence gaps and called for further research. The later evidence base, including the Yavari et al. (2022) review relied on by SLD, supports a similar management-led position: hydrological effects from solar farms are site-specific and depend principally on soil condition, compaction, vegetation cover, surface roughness and maintenance. The presentation therefore does not displace the Applicant's assessment. It supports the same central conclusion reached in the **Applicant's Response to Lead Local Flood Authority on Hydraulic Modelling Requirements [REP2-**

				045]. The relevant risk pathway is not the presence of panels in isolation, but deterioration of ground condition and creation of connected runoff pathways. That pathway is directly controlled through the Scheme's construction, soil, vegetation and drainage commitments. The Applicant therefore does not agree that the Burch, Armstrong and Maslen presentation demonstrates a need for full field-scale hydraulic modelling of the panelled areas. It reinforces the need for enforceable soil and vegetation management, which is already secured through the DCO.
Power and Generation				
SLD-056	REP2-042, §2.15; REP1-110, §2.1.22	Applicant's Detailed Response to Stop Lime Down Deadline 1 Submission on BESS Fire Emissions Outline Battery Safety Management Plan	4.1.48. SLD note the Technical Note produced at Deadline 2. Reflecting on the detailed response, SLD will review further and provide comment at the next deadline and/or consider whether any matters can be addressed as part of the SoCG process.	The Applicant notes this comment.

		May 2026 Revision 2		
Soils and Agriculture				
SLD-057	REP2-039, §SLD-287	Applicant' s response to the Written Representations	4.1.49. Appendix K1 points out that experience shows that grass does not grow well under panels due to heavy shading, shelter from rain and patchy wetness. The Applicant claims that this issue is dealt with in the outline Landscape and Ecological Management Plan (LEMP) [APP-283], in§§1.3.86 to 1.3.101. This merely says that diversity will be reduced under the panels due to shading. The large size and proposed close spacing of the panels will make this problem particularly acute. A good vegetation cover is essential to prevent soil erosion and enhanced runoff (see discussion under SLD-261and SLD-262). The Applicant does not have a credible plan for	The Applicant maintains that vegetation can and does establish beneath solar panels. A case study published by Solar Energy UK, drawing on ecological monitoring data from numerous operational solar farms across the UK, demonstrates that whilst botanical diversity and vegetation cover beneath panels may be lower than in areas between or outside panels, vegetation typically establishes and persists beneath solar arrays. This evidence supports the Applicant's position that the presence of solar panels does not prevent the establishment of vegetation beneath them. Solar Energy UK (2026), *Solar Habitat: Ecological Trends on Solar Farms in the UK*. Available at: https://solarenergyuk.org/resource/solar-habitat-2026/.. The **Outline LEMP [REP3-100]** contains appropriate and good practice management measures to establish grassland habitats across the Scheme. The **Outline LEMP [REP3-100]** also sets out an outline ecological monitoring strategy designed to assess the

			establishing vegetation in this demanding environment.	effectiveness of habitat creation and enable early identification of any remediation measures or management changes that may be required, including to ensure successful vegetation establishment beneath panels.
SLD-058	REP2-039, §SLD-291	Applicant' s response to the Written Representations	4.1.50. Appendix K1 points out that Field Capacity Days (i.e. when the soil is predicted to be saturated) are stated in the Applicant's ALC report ([APP-243] §1.2.11) to be higher than the average for lowland England (between 188 and 171 days per year as opposed to the average of 150 days). Around half the year is thus unsuitable for construction and trafficking on the field sites, and Appendix K1 questions whether construction is likely to be restricted to these times, given the cost and practicality of doing so. The Applicant responds only to say that Field Capacity Days is a "broad climatic parameter". The Applicant states that soil	The **Outline SRMP [REP3-098]** confirms that decisions to proceed, continue or halt works will be based on the actual wetness state of soils being handled, and that monitoring of weather and ground conditions can be used to inform additional mitigation decisions during works, such as machinery selection, for example switching from wheeled machinery to tracked, or larger to smaller, in order to protect the soil resource. It is feasible that ground conditions will be suitable for periods over the autumn and winter months and therefore the Applicant does not agree that a blanket commitment to not undertake any works between November and April is necessary. No soil will be destroyed. Soils from the BESS, substation and compound areas, and access tracks, will be stripped and stored in accordance with the principles of the SRMP and will

			handling will be restricted by the provisions of the Soil Resources Management Plan. The Applicant's Outline Soil Resources Management Plan ([APP-280] at §1.8.5) sets out the criteria for determining whether soil is suitable to be stripped or moved. For the Lime Down soils, which have a generally high clay content, the acceptable window will be similar, being 5 or 6 months from May or June onwards. But soil stripping and storage is a much more restricted operation than general construction. The nature of the soils on site means that the Applicant should be committing to no construction on field sites during the November to end April period. It would be acceptable to work on sites where the soil will be destroyed (e.g. the substations and BESS) during this period,	be retained on-site and available for reinstatement at such a time as is required.

			provided the soil was stripped and stored in the summer.	
SLD-059	REP2-039, §SLD-292	Applicant' s response to the Written Representations	4.1.51. Appendix K1 points out that the Outline Soil Resources Management Plan fails to consider damage to the existing field drainage system, particularly by piling and trenching. The Applicant states that "Where existing land drainage is encountered or affected during construction, it would be reinstated or otherwise managed so that drainage function is maintained". This is possibly reassuring, but the absence of any consideration in the outline SRMP suggests that the Applicant is unaware that this is potentially a very significant issue which will consume time and resources.	The Applicant confirms that they are aware of potential impacts of construction on existing agricultural drainage systems, and that a full drainage survey will be undertaken prior to construction to identify all land drains. Relevant controls are set out in the **Outline CEMP [REP3-092]**, including Section 3.6, Table 5: Hydrology, Flood Risk and Drainage, which requires temporary drainage to be developed and includes identification and protection of land drains and waterbodies within the Order limits. Further controls are set out in Section 3.12, Table 11: Soils and Agriculture, including pre-condition records, reinstatement of land used temporarily, soil handling controls and monitoring by a suitably experienced soil scientist. The operational drainage position is addressed in the **Outline OEMP [REP3-094]**, Section 2.14: Surface Water Drainage, which confirms that the detailed operational drainage design will be carried out with the objective of maintaining drainage of the land to the present level. Where construction of infrastructure interrupts existing land drainage, new sections of

				drainage would be constructed. These measures are also signposted through the **Commitments Register [REP1-114]**.
Alternatives and Site Selection				
SLD-060	REP2-043	Technical Note on Site Selection Assessment	See Appendix 1 below.	The Applicant has reviewed SLD's Appendix 1 and notes SLD's general disagreement regarding methodology, including the requirement to RAG rate areas identified in the additional sensitivity testing carried out in the **Technical Note on Site Selection Assessment [REP2-043]**. The Applicant considers its approach to alternatives, as set out in the **ES Volume 1 Chapter 4: Alternatives and Design Evolution [APP-056], ES Volume 3, Appendix 4:1 Site Selection Report [APP-185], and the Technical Note on Site Selection Assessment [REP2-043]** to be proportionate and 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.

				The Applicant does not intend to repeat its previous submissions in relation to site selection and alternatives considered and refers the ExA and SLD to the submissions made in the above documents. However, to generally address some of SLD's concerns regarding methodology: <u>25 km search area:</u> As set out the **Technical Note on Site Selection Assessment [REP2-043]** (see paragraph 1.1.6) the further analysis carried out in the technical note is intended to be a proportionate, high level review of the site selection process in order to address queries raised in examination. This is in line with the policy set out above and in particular NPS EN-1 paragraph 4.3.22. The Applicant does not consider it to be proportionate to RAG rate the additional areas identified between 20-25km. <u>Combining PDAs and using the least constrained areas:</u> The Applicant notes SLD's disagreement with its approach to PDA10 (i.e. the proposed Solar PV Sites for the Scheme). On the basis that this is a retrospective analysis of alternatives compared

				to the Scheme as proposed, the Applicant does not consider it appropriate to redraw PDA10. If PDA10 was redrawn to remove all constraints, it would not be a representative comparison against the Scheme as proposed. The Applicant also notes SLD's concerns regarding the methodology for determining the clusters. As set out in the **Technical Note on Site Selection Assessment [REP2-043]** paragraph 4.1.5, the clusters have been formed by removing all constrained land from the PDAs and then grouping the clusters in consideration of their size (i.e. adequate size for the Scheme), their proximity to the point of connection and their proximity to one another. They have then been proportionately assessed at a high level to consider their suitability as alternatives to the Scheme. Further, with regard to opportunities to avoid effects on constraints outside of the boundaries of the clusters (e.g. conservation areas) it is acknowledged in paragraph 1.1.6 of the **Technical Note on Site Selection Assessment [REP2-043]** that line with NPS 4.3.24, it is possible that other land within the search area could be used for future proposals and potential environmental effects could be

				avoided or reduced through the process of design evolution. However, that work is unlikely to be deliverable within the same timescales as the Scheme, and it is beyond the scope of the technical note and beyond the requirements of policy to carry out that design evolution for each potential alternative site considered. It is also acknowledged that other sites may be suitable for other solar developments, including smaller developments, to meet the UK's energy targets. It is also acknowledged in paragraph 1.1.6 of the technical note that there is no policy requirement to show that the proposed site for the Scheme has the fewest adverse impacts. <u>Redrawing PDAs to Apply Criteria Consistently</u> The Applicant notes SLD's concern that the redrawn PDAs should have been RAG rated and the Applicant's comments above regarding proportionality are repeated. With regard to the size of the PDAs/clusters and the opportunity for further exclusions for heritage assets, the Applicant's comments above and as set out in 1.1.6 of the **Technical Note on Site Selection Assessment [REP2-043]** are repeated.

Climate Change				
SLD-061	REP2-039, §§SLD-362 and SLD-363	Applicant' s response to the Written Representations	4.1.52. It is noted that a technical note on climate change and GHG emissions is to be provided by the Applicant. Detailed comment by SLD will be provided once it has had sight of this document. However, at this stage SLD does not accept the approach adopted is a cautious one. In the first place, changes in emissions related to future operational emissions are speculative and should be evidenced. Second, the approach adopted by the Applicant where grid emissions intensity is fixed in 2029 has the effect of overestimating the savings over the lifetime of the Proposed Development – it is far from a cautious approach and assumes that grid emissions intensity will not continue to improve (which is contrary to the Government's	Regarding the changes in emissions related to future operational emissions, **ES Volume 1, Chapter 7: Climate Change [APP-059]** applies the same conversion factors across both construction and operational phases, as a conservative approach not accounting for any reduction in carbon intensity. While future improvements in embodied carbon within materials, equipment, and transport emissions are anticipated, those reductions are not considered in **ES Volume 1, Chapter 7: Climate Change [APP-059]**. Concerning the consideration of using the fixed grid emissions for 2029, this methodology follows the EIA legislation that requires to assess the "*description of the relevant aspects of the current state of the environment (baseline scenario) and an outline of the likely evolution thereof without implementation of the development as far as natural changes from the baseline scenario can be assessed with reasonable effort on the basis of the availability of environmental information and scientific knowledge."* Since projects such as Lime Down contribute to grid decarbonization, attributing

			policy). On that basis, it is not understood how the 2029 figure can represent a “realistic but low grid” average for the life of the Scheme. Given the obligation to assess likely significant effects, neither fixing a figure nor using an inapposite comparison (to CCGT) is Appropriate.	future grid improvements to the baseline, rather than as a benefit of the Scheme, would misrepresent causality and understate the development's positive contribution to decarbonization objectives. Furthermore, the comparison presented in **ES Volume 1, Chapter 7: Climate Change [APP-059]** is considered conservative as it considers the global Scheme’s emissions vs the Territorial UK emissions considered in the grid intensity as explained in the **Climate Response to Wiltshire Council Appendix B of Written Rep and SLD Appendix J1 [REP3-132]** section 5.2 page 11.
SLD-062	REP2-039, §SLD-372	Applicant’ s response to the Written Representations	4.1.53. SLD disagrees. Cirencester does have temperature minimum and maximum date, and that site (and other stations closer than Yeovilton) are chosen by the Met Office as suitable for climate change assessments.	The Cirencester station is not listed in the official Met office website as a station with historic data. Please visit the website below for a full list of the stations listed on the official website: https://www.metoffice.gov.uk/research/climate/maps-and-data/historic-station-data
Draft DCO				
SLD-063	REP2-039, §SLD-418	Applicant’ s response to the	4.1.54. SLD repeat the point made from para 2.1.3 of its Deadline 1A submission	The Applicant is unclear as to which document SLD is referring to. SLD’s post hearing submission referred to in the comment **[REP1A-**

		Written Representations	[REP1A-022] (SLD D1A Submission).	**022]** does not contain a paragraph 2.1.3. SLD's **Written Representation [REP1-167]** also does not contain a paragraph 2.1.3. The Applicant has assumed that SLD is referring to paragraph 2.1.3 of its **comments on submissions received at deadlines 1 and 1A [REP2-051]** and has provided a response on this basis. If this is however not the case, the Applicant welcomes further clarification from SLD. The Applicant refers SLD to its response to WCD1-018 in the **Applicant's Response to Comments Received at Deadline 2 [REP3-129]**, which addressed an equivalent point raised by Wiltshire Council.
SLD-064	REP2-039, §SLD-419	Applicant' s response to the Written Representations	4.1.55. SLD repeat the point made from para 2.1.6 of the SLD D1A Submission.	As with SLD-063, the Applicant is unclear as to which document SLD is referring to. SLD's post hearing submission referred to in the comment **[REP1A-022]** does not contain a paragraph 2.1.6. SLD's **Written Representation [REP1-167]** also does not contain a paragraph 2.1.6. The Applicant has assumed that SLD is referring to paragraph 2.1.6 of its **comments on submissions received at deadlines 1 and 1A [REP2-051]** and has provided a response on this basis. If this is however not the case, the

				Applicant welcomes further clarification from SLD. The Applicant refers SLD to its response to SLD's Deadline 2 submissions at SLD-013 and SLD-014 in the **Applicant's Response to Comments Received at Deadline 2 [REP3-129]**, which addressed an equivalent point in full.
SLD-065	REP2-039, §SLD-420	Applicant' s response to the Written Representations	4.1.56. SLD have addressed the scope of some PPW above as part of the ExAQs. In respect of the "apparatus", SLD consider that the DCO still requires further clarification. The words "(not including those cables comprising part of the authorised development)" should be included in the definition of "apparatus" to make express what the Applicant considers to be implied in the draft.	The Applicant refers SLD to its response to SLD-420 in the **Applicant's Response to Written Representations [REP2-039]**, which addressed an equivalent point raised by SLD at Deadline 1.
SLD-066	REP2-039, §SLD-421	Applicant' s response to the	4.1.57. The Applicant's response is noted. SLD consider that the word	The Applicant refers SLD to its response to SLD-081 in the **Applicant's Response to Comments Received at Deadline 2 [REP3-129]**, and to the

		Written Representations	"only" should be introduced in Article 40(4) after the word "remove" to make express in the DCO the Applicant's interpretation of these provisions.	response to WCD1-023 in the same document, both of which address the scope and effect of Article 40(4) of the **Draft DCO [REP3-005]**. Please also refer to DCO1.27 in the **Applicant's Response to the Examining Authority's First Written Questions [REP3-128]** submitted at Deadline 3.
SLD-067	REP2-039, §SLD-422	Applicant' s response to the Written Representations	4.1.58. SLD will review the Explanatory Memorandum when it becomes available (on this and other matters where relevant) and respond as appropriate.	The Applicant notes this comment and confirms that an updated **Explanatory Memorandum [REP3-007]** was submitted at Deadline 3.
SLD-068	REP2-039, §SLD-423	Applicant' s response to the Written Representations	4.1.59. It is noted that the Applicant accepts there is overlap between Article 17 and s.106 WIA 1991. SLD remain of the view that s.106 should be excluded to the extent it overlaps with Article 17. While the dispute resolution mechanisms under s.106 apply to Article 17 (see Article 17(2)), Article 17 permits (among other things) the application of terms and conditions to discharge.	The Applicant refers SLD to its response to SLD-423 in the **Applicant's Response to Written Representations [REP2-039]**, which addressed the question of whether sections 106 and 118 of the Water Industry Act 1991 should be disapplied by the draft DCO.

			Section 106 does not permit this. As such, to preserve the distinct controls in Article 17, s.106 should be disapplied to that extent.	
SLD-069	REP2-039, §SLD-423	Applicant' s response to the Written Representations	4.1.60. If the Applicant considers that Article 17(2) means not merely the dispute resolution conditions under s.106 apply, but all of the provisions of s.106, SLD consider this (1) should be examined; and, (2) Article 17(2) requires clarification. In particular, such examination related to Article 17 should concern the power in that provision to impose terms and conditions. SLD are of the view that the power to impose terms and conditions is appropriate for inclusion.	The Applicant refers SLD to its response to SLD-423 in the **Applicant's Response to Written Representations [REP2-039]**, which addressed the question of whether sections 106 and 118 of the Water Industry Act 1991 should be disapplied by the draft DCO.
SLD-070	REP2-039, §SLD-423	Applicant' s response to the	4.1.61. The position related to s.116 is noted; while SLD note that the Applicant does not propose to use s.116 it is	The Applicant notes this comment.

		Written Representations	accepted that that is not a reason in itself to disapply the provision.	
SLD-071	REP2-039, §SLD-424	Applicant' s response to the Written Representations	4.1.62. The explanation for Article 44 is accepted.	The Applicant notes this comment and welcomes SLD's comment that the Applicant's explanation in respect of Article 44 is accepted.
SLD-072	REP2-039, §SLD-425	Applicant' s response to the Written Representations	4.1.63. SLD consider the extension of time a move in the right direction, but note the concern of the Council that more time was requested [REP2-048]. That request should be acceded to.	The Applicant refers SLD to its response to WCD1-032 in the **Applicant's Response to Comments Received at Deadline 2 [REP3-129]**, and to its response to SLD-015 in the same document, both of which address the equivalent point. The Applicant also refers SLD to its response to SLD-431 in the **Applicant's Response to Written Representations [REP2-039]**.
SLD-073	REP2-039, §SLD-426	Applicant' s response to the Written Representations	4.1.64. SLD maintains its position and considers this change is appropriate in the circumstances given the effects of the Proposed Development, the extensive mitigation proposed, and importance of these issues to the community. Direct engagement is different to	The Applicant refers SLD to its response to SLD-426 in the **Applicant's Response to Written Representations [REP2-039]**, which addressed this point in full.

			raising matters with the Council for it to consider enforcing. SLD remain of the view that this change is proportionate.	
SLD-074	REP2-039, §SLD-427	Applicant' s response to the Written Representations	4.1.65. That such a Community Liaison Manager is provided for during decommissioning is welcome.	The Applicant refers SLD to its response to SLD-427 in the **Applicant's Response to Written Representations [REP2-039]**, which addressed this point in full. The Applicant welcomes SLD's acknowledgement that the provision of a Community Liaison Manager during the decommissioning phase is welcome. As the Applicant confirmed at SLD-427, Section 2.10 of the **Outline Decommissioning Strategy [REP3-096]** already requires a Community Liaison Manager to be appointed during the decommissioning phase of the Scheme. This is secured through Requirement 20 of Schedule 2 to the **Draft DCO [REP3-005]**, which requires decommissioning to be carried out in accordance with the Decommissioning Plan prepared substantially in accordance with the **Outline Decommissioning Strategy [REP3-096]**. The existing provisions of the **Draft DCO [REP3-005]** are therefore considered appropriate in this respect and no amendment is proposed.

SLD-075	REP2-039, §SLD-428	Applicant' s response to the Written Representations	4.1.66. SLD do not accept that all other works are addressed by other Requirements. The Applicant should provide (either by way of technical note, or in the Explanatory Memorandum) an explanation of how it understands all other Works to be controlled outside of Requirement 5. SLD maintains its position.	The Applicant refers SLD to its response to SLD-428 in the **Applicant's Response to Written Representations [REP2-039]**, which addressed this point in full. The Applicant's position remains unchanged and is set out below. As the Applicant previously explained at SLD-428, Requirement 5 only relates to Work Nos. 1, 2 and 3 because other Work Nos. either relate to subsoil activities that are not required to be subject to the same types of detailed design controls, or are controlled by other Requirements. The Applicant does not accept SLD's submission that all other Works are not adequately addressed by other Requirements. The Applicant notes that SLD have requested that it provide either a technical note or an explanation in the Explanatory Memorandum setting out how it understands all other Works to be controlled outside of Requirement 5. The Applicant considers that this explanation is already provided in the **Explanatory Memorandum [REP3-007]** and draws SLD's attention to the relevant passages as follows.

				The **Explanatory Memorandum [REP3-007]** explains that Work No. 5 — being located entirely underground — is not subject to the wider set of detail-approval items in Requirement 5, as it will not be visible. Requirement 5(4) nonetheless provides that Work No. 5 must be carried out in accordance with Table 2-4 of the **Design Principles and Parameters [REP3-083]**, ensuring that appropriate design controls are applied to that Work even in the absence of a pre-commencement approval requirement. In addition to Requirement 5, the Explanatory Memorandum identifies a number of further Requirements that provide design and environmental controls over Works beyond Work Nos. 1, 2 and 3, including Requirement 10 (permanent fencing and other means of enclosure), Requirement 11 (surface and foul water drainage), Requirement 12 (archaeology), Requirement 14 (Outline Operational Environmental Management Plan), Requirement 16 (public rights of way and permissive paths management), and the protective provisions in Schedule 15 to the **Draft DCO [REP3-005]**. The inclusion of additional Works Nos. within Requirement 5 is therefore unnecessary and

				would duplicate a process separately controlled by other Requirements of the **Draft DCO [REP3-005]**. The Applicant considers that the **Explanatory Memorandum [REP3-007]** already provides the explanation SLD request, and that no separate technical note is required. No amendment to Requirement 5 of Schedule 2 to the **Draft DCO [REP3-005]** is proposed in response to this point.
SLD-076	REP2-039, §SLD-429	Applicant' s response to the Written Representations	4.1.67. This matter is already addressed above as it was also raised by the ExA as part of the ExAQs.	The Applicant notes this comment.
SLD-077	REP2-039, §SLD-430	Applicant' s response to the Written Representations	4.1.68. SLD disagree. If a matter requires confidentiality (e.g. location of badger setts), that is a matter which can be raised with the arbitrator. A presumption of confidentiality is a departure from the normal principles of open justice, and also would allow one party to maintain confidentiality against the wishes of another. The approach taken in the cited DCOs should be adopted.	The Applicant refers SLD to its response to SLD-430 in the **Applicant's Response to Written Representations [REP2-039]**, which addressed this point. In respect of the point made in relation to badger setts, the Government's guidance 'Badgers: advice for making planning decisions' (available here), confirms that surveys should be kept confidential in order to avoid the ill treatment of badgers.

SLD-078	REP2-039, §SLD-431	Applicant' s response to the Written Representations	4.1.69. SLD consider the extension of time a move in the right direction, but note the concern of the Council that more time was requested [REP2-048]. That request should be acceded to.	The Applicant refers SLD to its response to SLD-431 in the **Applicant's Response to Written Representations [REP2-039]**, which addressed this point in full.
SLD-079	REP2-039, §SLD-434	Applicant' s response to the Written Representations	4.1.70. As a preliminary point, SLD query the words "not so substantive" in relation to the height of fixed panels, and remain of the view that the Design Principles and Parameters can be used to avoid effects through the use of smaller panels. SLD consider that this issue has to be considered alongside the mitigation proposed, so as to understand whether more substantial mitigation is required in relation to 4.5m panels (to thereby mitigate those panels at the height of their elevation). SLD consider that the analysis provided should take into	The Applicant maintains its position as set out in their response to SLD-434 within the **Applicant's Response to Written Representations [REP2-039]** and maintains that from an LVIA perspective one system or the other is unlikely to result in a greater or lesser level of effect.

			account whether mitigation measures are reduced by 3.5m panels. As appropriate, SLD will address this as part of discussions related to Landscape and Visual Amenity at the relevant ISH.	
SLD-080	REP2-039, §SLD-437	Applicant' s response to the Written Representations	Applicant' s response to the Written Representations, 4.1.71.SLD repeat the point made from para 4.1.2 onwards of the SLD D1A Submission concerning confidentiality.	As noted above at SLD-063 and SLD-064, the Applicant is unclear as to which document SLD is referring to. SLD's post hearing submission referred to in the comment (**SLD post hearing submissions [REP1A-022]**) does not contain a paragraph 4.1.2. SLD's **Written Representation [REP1-167]** also does not contain a paragraph 4.1.2. The Applicant has assumed that SLD is referring to paragraph 4.1.2 of its **Comments on submissions received at deadlines 1 and 1A [REP2-051]** and has provided a response on this basis. If this is however not the case, the Applicant welcomes further clarification from SLD. The Applicant refers Stop Lime Down to its responses to SLD-436 to SLD-444 in the **Applicant's Response to Written Representations [REP2-039]**, which addressed the substance of these points in full. The Applicant's position on each of the matters raised

				in SLD's Deadline 2 submission at paragraphs 4.1.2 to 4.1.6 is set out below. The Applicant is subject to contractual confidentiality obligations that prevent disclosure of the terms of relevant commercial agreements without the other party's consent, and that this is distinct from a generic claim of commercial sensitivity. With the landowner's consent, the Applicant is able to confirm that the Option Agreement dated 21 February 2023 in respect of Site E has a maximum term of 40 years, and that any extension to 60 years would be by agreement. On the GHG assessment, the Applicant has provided calculations for GHG emissions based on a 40-year duration, with total GHG emissions in that scenario estimated at 736,869 tCO2e instead of 933,140 tCO2e, on the assumption that full replacement of panels would not take place during the operational phase. However, the Applicant notes that due to lower energy generation over 40 years, the net saving over the Scheme's lifetime would reduce from 253,839 tCO2e to 14,256 tCO2e using the methodology set out in **ES Volume 1, Chapter 7: Climate Change [APP-059]**.

				In respect of the points made regarding partial decommissioning and distribution of mitigation and enhancement, decommissioning of part of the Scheme would remove mitigation or enhancement required for the remaining parts, the Applicant confirms it would be required to do one of three things: (1) secure rights to retain the required mitigation; (2) apply to change the mitigation to another appropriate form or location; or (3) decommission the other parts of the Scheme. The Applicant confirms it has added amended wording to Schedule 2, Requirement 20 of the **Draft DCO [REP3-005]** to address decommissioning of parts of the Scheme earlier than other parts. That amended wording ensures that associated development cannot remain in place beyond the decommissioning date of the relevant part of Works No. 1, preventing later-commissioned ancillary works from extending the authorised development's operational lifetime. In respect of the reasonable worst case, the **Draft DCO [REP3-005]** imposes a maximum operational period of 60 years, but there is no requirement for the Scheme to remain operational for 60 years. The Applicant's

				position is that a 60-year operational period is treated as the reasonable worst case for the purposes of the EIA assessment, as it includes GHG emissions over the maximum operational period, including replacement-related emissions. The Environmental Statement already concludes on the likely effects from a worst-case scenario.
SLD-081	REP2-039, §§SLD-439 and SLD-440	Applicant' s response to the Written Representations	4.1.72. As above, SLD repeat the point made from para 4.1.2 onwards of the SLD D1A Submission concerning confidentiality. As identified, the issue is not merely the benefits of the Proposed Development and the relevant GHG emissions concerning the scheme, but also the harms of the Proposed Development and securing mitigation.	The Applicant refers SLD to the response given above at SLD-080.
SLD-082	REP2-039,§§SLD-439 and SLD-440	Applicant' s response to the Written Representations	4.1.73. SLD disagree with the Applicant's view in SLD-440 that the DCO manages this issue. In the first place, the obligation on the Applicant is to	The Applicant refers SLD to the response given above at SLD-080.

			assess the likely significant effects in EIA terms. Given the information currently available (including about the length of agreements) that has not been done. Drafting in the DCO does not change this position. In any event, the DCO provides for partial decommissioning. If the Applicant is now of the view that it could not use the partial decommissioning powers without amendments to the Outline Plans (or other modifications to the DCO) or similar, there is no requirement for partial decommissioning powers and they should be removed. Rather, the Applicant should make an amendment application when the underling position changes.	
SLD-083	REP2-039, §SLD-443	Applicant' s response to the	4.1.74. SLD do not agree with the Applicant. The Applicant does not assess the likely	The Applicant disagrees with this comment as they consider that assessing a 60-year operation phase represents the reasonable worst

		Written Representations	significant effects of the Scheme, and were it to assess a reasonable worst case it would assess one which properly reflected the evidence on entitlement to the land now. It is incumbent on the Applicant to furnish the ExA with the requisite information.	case from an EIA perspective. The Environmental Statement therefore reports the likely effects of the Scheme from a worst-case scenario. Further assessment work considering scenarios with differing operational phase durations, which do not represent a reasonable worst case, would not provide the ExA a fuller picture of likely significant effects.
SLD-084	REP2-039, §SLD-444	Applicant' s response to the Written Representations	4.1.75. SLD does not repeat its submissions, but this neither responds to the fact that the Applicant freely entered those agreements, and the Applicant is under the duty to furnish the ExA with the relevant information. The requests in respect of this issue made by the ExA in the ExAQ are particularly pertinent.	The Applicant refers to its response to ExQ1 GCT1.11 in the **Applicant's Response to the Examining Authority's First Written Questions [REP3-128]** which provides further information on the lease terms.
SLD-085	REP2-039, §§SLD-446 and 449	Applicant' s response to the Written Representations	4.1.76. It is noted that ExA has asked questions relevant to this issue (e.g. GCT1.7). SLD will comment on the further information provided at the appropriate time. However,	The Applicant has provided its answer to ExQ1 GCT 1.7 in the **Applicant's Response to the Examining Authority's First Written Questions [REP3-128]** (from electronic page 341 of 623).

			it is noted that the Applicant does not actually explain how the test in NPS EN-1 para 4.11.12 can be met by a Gate 1 connection agreement. That certain policies are not to be understood to impose limits on new infrastructure does not change that the Applicant cannot apparently provide sufficient assurance to meet the para 4.11.12 test.	
SLD-086	REP2-039, §§SLD-452 and 453	Applicant' s response to the Written Representations	4.1.77. The Applicant's submission does not address the specific point about the interaction between the Gate offers for connection and the relationship between the PV and the BESS. It is noted that the ExA has asked questions related to this issue (e.g. GCT1.7) and SLD will comment at the appropriate time.	The Applicant has provided its response to First Written Questions (**Applicant's Response to the Examining Authority's First Written Questions [REP3-128]**) and awaits SLD's comments on this point.
SLD-087	REP2-040 §SLD-019	Applicant's Response to	4.1.78. SLD draws attention to the submissions already made above in this section. The	The Applicant has provided its answer to ExQ1 GCT 1.11 in the **Applicant's Response to the Examining Authority's First Written**

		Deadline 1A Submission	obligation in EIA terms is to assess what the likely significant effects are considered on a reasonable worst case basis. SLD remains of the view that this is not done. As a first step, SLD consider it key that a proper and full answer to GCT1.11 is provided. SLD will comment on this issue further.	**Questions [REP3-128]** (from electronic page 359 of 623). This confirms the option periods in the various Solar PV Sites where consent to disclose the term was granted.
SLD-088	N/A	N/A	Conclusion 5.1.1. This submission has reviewed the documents submitted by the Applicant at other parties at Deadline 2. 5.1.2. SLD's review of that material confirms that the additional information has not resolved the concerns raised by SLD at preceding deadlines. For all the reasons set out in this submission, and the documents prepared by SLD so far, SLD maintains that	This comment is noted. Detailed responses to the pointed raised are provided in SLD-001 to 087 above.

			development consent should not be granted for the Scheme.	

4 The Applicant's Responses to Parties Mentioned in the Book of Reference

4.1 Jonathan Seymour Williams

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
JSW-001	Hydrology, Flood Risk and Drainage		https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN010168-001809-1000066695.pdf	The Applicant notes the image. The image is understood to show an open manhole / drainage chamber in the off-site area identified during the Accompanied Site Inspection, where the landowner explained to the Examining Authority and the Applicant's hydrologist that the feature was associated with flooding of the adjacent paddock. The Applicant confirms that the localised flood risk identified by the landowner is shown on the submitted flood risk mapping, specifically **ES Volume 2, Figure 11-4: Lime Down C2 Fluvial and Surface Water Flood Risk Map (Rev 2) [REP3-030]**. The mapping shows localised surface water flood risk at the location identified during the site inspection. As the feature is off-site, it has not been subject to a separate site-specific hydraulic assessment. However, the submitted mapping captures the localised flood risk mechanism identified by the landowner, and this matter was discussed on site

				during the Accompanied Site Inspection. The Applicant does not consider that the image identifies a new or previously unmapped flood risk matter. Where existing land drainage, culverts, manholes or drainage features are encountered or affected during construction, they would be protected, reinstated or otherwise managed so that drainage function is maintained, in accordance with the controls secured through the **Outline CEMP [REP3-092]** and **Outline SRMP [REP3-098]**.

4.2 Mr John Eavis and Mrs Rosemarie Eavis

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
JE-001	Description and DCO Process	Introduction	Comments on the Applicants Response to the Written Representations [REP1-164] on behalf of Mr John Eavis) and Mrs Rosemarie Eavis (the Owners) of Manor Farm, m) against the proposed application for a Development Consent Order (the DCO) for the Lime Down Solar Project (the Development) by Lime Down Solar Park Limited (the Applicant). The Owners remain concerned that the Applicant's response does not adequately address the principal issues raised in their Written Representation.	The Applicant notes this comment and has responded to the concerns in full below (JE-002 to JE-015).
JE-002	Description and DCO Process	Land Rights	Whilst the Applicant relies upon the Rochdale Envelope approach, design flexibility and ongoing negotiations, it has not demonstrated why the extent of land and rights	Details relating to the rights sought across plots 05-043 and 06-001 to 06-006 can be found in the **Book of Reference [REP3-009]**, which sets out the rights that are required for the development, operation and maintenance of the scheme. Further detail regarding the

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			sought over parcels 05-043 and 06-001 to 06-006 represents the minimum land and rights reasonably necessary to deliver the Proposed Development.	extent and purpose of the rights being sought can be found in the **Statement of Reasons [APP-018]**. Plots 05-043 and 06-001 to 06-006 can be found in the **Land Plans [APP-006]** where the Applicant has shown the respondent's land in blue, over which new rights are to be acquired. The occupation of the land will be temporary, with permanent rights required in order to operate and maintain the proposed development, as well as decommission. Whilst the Applicant has sought to explore a reduction in the extent of the land potentially required within the respondent's stewardship, no further reductions at this stage can be offered due design flexibility requirements to finalise the design. This reliance on the Rochdale Envelope approach is essential to ensuring that the Scheme remains deliverable as detailed design and engineering progresses. The works in this location include the laying of cabling, access, working areas and optionality for crossing locations on A429 with interconnecting cables. The Applicant confirms that while the Order Limits as they are now at this location are required to provide necessary spatial flexibility for final crossing design alignment and, the actual

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				construction working width will be a maximum of 25m meaning the Applicant will ultimately reduce the final land take where possible as the design develops and the final locations are confirmed. However, at this stage plots across plots 05-043 and 06-001 to 06-006 are needed to make sure that that workable and deliverable options for the works required across the land and on the highway can be provided. Following the completion of construction, the Applicant is committed to the full reinstatement of land within the cable route to its original agricultural use, with any losses incurred during the temporary construction period being compensated for. The Applicant remains committed to ongoing engagement with the respondent and their professional representatives to reach a voluntary agreement that accounts for specific practical concerns and ensures the long term viability of the farming business
JE-003	Description and DCO Process	Compulsory Acquisition	A particular concern is the inconsistency between the Applicant's compulsory acquisition case and its negotiating position.	The Applicant is seeking rights which are the minimum required to deliver the project. The Applicant welcomes the opportunity to engage and negotiate with the respondent's appointed land agent, noting the

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			Throughout discussions, the Applicant has repeatedly suggested that substantially less land may ultimately be required than is included within the Order Limits and that not all of the rights sought through the draft DCO are expected to be exercised in practice. However, those assertions are not reflected in either the powers sought through the DCO or the voluntary Heads of Terms presented to the Owners.	communications and negotiations to date as shown in **the Land and Rights Negotiation Tracker [REP3-011]** and the **Land and Rights Communication Log [REP3-130]**. Noting the respondent's concerns, it is the intention of the Applicant to continue in negotiating the voluntary agreement with the respondent's appointed land agent. Through this meaningful engagement, the Applicant seeks to minimise the level of disruption that the respondent may experience. The works required by the Applicant have been explained to the respondent in both written form and in meetings held either in person or virtually. The Applicant is seeking to agree the rights contained within the Heads of Terms, and not anything in excess of those contained within the **Draft DCO [REP3-005]**. Please see response to JE-002 for details regarding the reasoning for seeking the rights being sought.
JE-004	Description and DCO Process	Land Rights	The Owners have repeatedly sought clarification as to which land and rights are genuinely required and which powers are retained only as a	The Applicant has provided detail relating to the rights being sought to the respondent and to their appointed land agent. This information was sent via email to the respondent's appointed land agent on 20th April 2026, as

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			contingency. Despite this, the Applicant continues to seek extensive compulsory acquisition and temporary possession powers whilst simultaneously indicating that the full extent of those powers may never be needed. This inconsistency has made meaningful voluntary negotiations difficult. The Heads of Terms presented to date do not provide a coherent reflection of either the powers sought through the DCO or the Applicant's own descriptions of how the Development is expected to be delivered. In the Owners' view, the level of design information available at this stage should be sufficient to identify a more clearly defined and proportionate suite of rights.	set out in page 847 of the **Applicants Response to Written Representations [REP2-039]**. Further engagement by the Applicant with the respondent's land agent have yielded progress on the Heads of Terms, and the detail of the negotiations to date can be found in the **Land and Rights Negotiation Tracker [REP3-011]**.
JE-005	Description and DCO Process	Land Rights	The Owners are also concerned by the inconsistency between the	The rights that are required and that the Applicant is seeking across Plots 05-043 and 06-001 to 06-006 are contained within the

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			Applicant's approach to assessment and its approach to negotiations. The Applicant relies upon a reasonable worstcase scenario in support of its environmental assessments, land requirements and compulsory acquisition case. However, during negotiations the Owners have repeatedly been advised that substantially less land and fewer rights are likely to be required in practice. The Owners are therefore being asked to negotiate on the assumption that the worst-case scenario will not occur, whilst the Applicant continues to seek powers and secure consent on the basis that it could.	Heads of Terms which are currently being negotiated between the parties. The Applicant, alongside the respondent's land agent have spent considerable time in discussing the Heads of Terms, progress is being made, and the Applicant welcomes the opportunity for further meetings in order to progress the Heads of Terms. The EIA presented within the ES has been undertaken adopting the principles set out in the Planning Inspectorate's Advice Note Nine: Rochdale Envelope which provides guidance regarding the degree of flexibility that may be considered appropriate within an application for development consent under the Planning Act 2008. **ES Volume 1 Chapter 6: EIA Methodology [APP-058]** sets out for each technical discipline, the maximum (and where relevant, minimum) parameters for the elements where flexibility needs to be retained have been assessed under the Rochdale Envelope approach. Therefore, the maximum land extent for the Scheme has been considered, ensuring that worst case overall impacts are predicted in the Application, which following detailed design may be reduced.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
JE-006	Description and DCO Process Socio-Economics, Tourism and Recreation	Impact on Private Business	The Owners are further concerned that the Applicant's assessment of private loss appears to focus primarily upon the eventual exercise of compulsory powers. However, the grant of extensive compulsory acquisition and temporary possession powers over almost 20% of Manor Farm would itself have immediate consequences for the holding. The existence of those powers creates uncertainty regarding future investment, business planning, environmental schemes, tenancy arrangements, succession planning and the wider management of the farming business. Those impacts arise from the existence of the powers themselves and not merely from their future exercise.	The Applicant notes these concerns and is working with the respondent's land agent on the Heads of Terms, the latest update and detail of these can be seen in the **Land and Rights Negotiation Tracker [REP3-011]** and **Land and Rights Communication Log [REP3-130]**. The Applicant is seeking to minimise disruption wherever possible and is confident that this can be achieved through Heads of Terms negotiations, allowing both parties the opportunity to mitigate any losses, and reduce uncertainties around how the farming business at this location continues operating while the Scheme is constructed.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
JE-007	Description and DCO Process	Land Rights	These concerns are reinforced by the Examining Authority's own question CA1.1, which seeks confirmation that all land within the Order Limits is required for the construction, operation or maintenance of the Development and that the Order Limits are tightly drawn and contain no more land than is necessary. The Owners remain concerned that the Applicant has not satisfactorily explained why the extensive powers sought over almost 20% of Manor Farm are required, particularly when it continues to indicate during negotiations that substantially less land and fewer rights may ultimately be needed.	The Applicant has responded to the point raised regarding the area of the powers sought over Manor Farm, and the reasoning for it under JE-002 above. The Applicant will work with the respondent and their appointed land agent to ensure that disturbance is minimised where practicable , and that the respondent is kept fully updated as designs mature.
JE-008	Description and DCO Process	Land Rights	The Applicant's response does not identify any meaningful reduction in land take, rights sought or scheme design arising from	The Applicant has responded to this query previously in **The Applicants Response to Written Representations,** pages 849, 850 and 851 under reference KMT-005 **[REP2-039].** As stated in response page 850, The

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			engagement with the Owners. The Owners therefore remain of the view that the Applicant has not demonstrated that the powers sought over parcels 05-043 and 06-001 to 06-006 are proportionate, represent the minimum interference with private rights, or are supported by a compelling case in the public interest.	Applicant has adopted a proportionate approach to the type of powers sought. The use of a wider corridor with subsequent narrowing of permanent rights ensures that only the minimum area is retained following construction, as set out in paragraph 5.5.3 of the **Statement of Reason [APP -018]**.
JE-009	Description and DCO Process	General Remarks	Response to ExA Question CA1.31 Manor Farm extends to approximately 415 acres and operates as a single integrated agricultural business. The holding is managed through an arable and grass rotational system which supports the wider farming operations including a sheep enterprise. The role and importance of individual fields cannot therefore be assessed solely by reference to their current year's use.	The Applicant notes this comment. The Applicant acknowledges that the land within the holding is managed as a rotational system and understands that the use of any individual field may change year on year. The Applicant has not ascribed levels of importance to individual fields based upon the use in any one year, and therefore the current use has not affected the assessment.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
JE-010	Description and DCO Process Socio-Economics, Tourism and Recreation	Impact on Private Business	The land affected by the proposed cable route corridor and associated powers comprises almost 20% of the total farmed area. In addition, the affected parcels occupy a strategically important position within the holding between the Rodbourne and Hullavington elements of the scheme. Consequently, the potential impacts of the Development extend beyond the acreage directly affected and include implications for field access, machinery movements, crop rotations, environmental scheme delivery and the wider operation of the farming business.	The proposed access track follows the existing field boundaries. Once installed, the Applicant does not consider that this should impact on the usual farming practices across the land. The cable installation will require a temporary, short-term disruption. The **Outline Construction Environmental Management Plan [REP3-092]** and the **Outline Soil Resources Management Plan [REP3-098]** both make provision for land above cables to be reinstated promptly and to the baseline condition, or a condition otherwise agreed with the landowner. Any defects identified and agreed will be remediated before the land is handed back. Farming operations will be able to resume shortly after cable installation and are also not anticipated to significantly impact on the usual farming practices across the land.
JE-011	Hydrology, Flood Risk and Drainage Soils and Agriculture	Agricultural Drainage Infrastructure	The Owners are particularly concerned regarding the potential impact on existing agricultural drainage infrastructure. The affected land is dependent upon field drainage systems which	The Applicant notes the concern regarding existing agricultural drainage infrastructure. The permanent cables will be installed below ground and will not create an operational surface water discharge or require a new operational drainage connection to existing field drainage systems.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			support agricultural productivity across the holding. Disturbance to drainage systems during construction, together with soil compaction arising from construction traffic, compounds and working areas, has the potential to affect not only the land directly occupied by the works but also adjoining areas. Such impacts may not become apparent immediately and may persist long after construction has been completed.	Where the cable route crosses or affects existing agricultural drains, those drains will be identified through pre-construction surveys and detailed design. Existing drainage functions will be protected, temporarily managed, diverted, reinstated or repaired as appropriate so that land drainage is maintained. Construction-stage risks, including disturbance to field drains, temporary runoff, sediment control and water encountered in excavations, will be managed through the detailed CEMP and Water Management Plan secured under Requirement 13 of the **Draft DCO [REP3-005]**. Soil compaction risks are separately addressed through the **Outline Soil Resources Management Plan [REP-098]** and Requirement 18 of the **Draft DCO [REP3-005]**. These controls include restrictions on trafficking in unsuitable ground conditions, protection of soil structure, reinstatement and remedial loosening where required. The Applicant therefore considers that the potential effects on agricultural drainage infrastructure and soil compaction are capable of being appropriately managed

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				through the secured detailed design, construction and soil management controls.
JE-012	Description and DCO Process Site Selection and Alternatives	Scheme Description	A further difficulty in assessing the overall impact arises from the continuing uncertainty surrounding the Development. The final location of the cable route, construction compounds, access arrangements, construction logistics and duration of occupation remain uncertain. This uncertainty is compounded by the fact that the Applicant seeks extensive powers on a worst-case basis whilst repeatedly indicating during negotiations that substantially less land and fewer rights are likely to be required in practice.	Further to the Applicant's response to JE-002, the DCO application assesses the Scheme within defined design parameters that the detailed design must meet. This is consistent with the Rochdale Envelope / design envelope approach used for NSIP assessment, where detailed layout, technology, supplier selection and construction methods are refined after consent within assessed parameters. The location of the Cable Route Corridor, construction compounds, access arrangements and construction logistics will be refined.
JE-013	Description and Process Consultation and Engagement	Landowner Engagement	The Owners have engaged constructively with the Applicant throughout the preapplication and examination process and have participated in numerous meetings,	The Applicant notes the engagement to date and thanks the respondent. The Applicant will continue to engage and meet with the respondent and their appointed land agent.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			discussions and exchanges of correspondence regarding both the proposed rights and potential voluntary agreements. Negotiations remain ongoing and the Owners remain willing to continue engaging with the Applicant.	
JE-014	Description and DCO Process Site Selection and Alternatives	Land Rights	However, meaningful progress has been hindered by the continuing disconnect between the extensive powers sought through the DCO and the Applicant's repeated assertions during negotiations that substantially less land and fewer rights are likely to be required in practice. Despite extensive engagement, no meaningful reduction in the extent of land affected or the powers sought has been achieved.	The Applicant has responded to this query previously in the **Applicants Response to Written Representations,** pages 849, 850, 851, and 852 under reference KMT-004 and KMT-005 **[REP2-039]**. Since The Applicants Response to Written Representations was issued, the Applicant has continued to work with the respondent's land agent to clarify matters and explain in detail the rights sought through the Heads of Terms.
JE-015	Description and DCO Process Socio-Economics,	Summary	The principal impact on Manor Farm is therefore not limited to the temporary or permanent loss of land. It	To help mitigate potential losses and support forward planning of the farming business, the Applicant encourages the Respondent and their appointed land agent to continue

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
	Tourism and Recreation		also arises from the uncertainty created across the wider farming business by extensive compulsory acquisition and temporary possession powers being sought over a significant and strategically important part of the holding without sufficient certainty as to how those powers will ultimately be exercised in the short, medium or longer term. This uncertainty affects business planning decisions now, including decisions relating to future investment, environmental schemes, infrastructure improvements and the wider management of the holding.	engaging in the constructive manner demonstrated to date. Ongoing engagement will enable the Respondent to make more informed decisions regarding farm business planning and foster a collaborative working relationship. The Applicant remains fully committed to this approach throughout the examination process and beyond, with the aim of ensuring both parties are well positioned to minimise disturbance wherever possible. The Applicant's intention is that both the planning process and the implementation of any eventual rights are carried out collaboratively and, wherever feasible, on a voluntary basis.
JE-016	Description and DCO Process Socio-Economics, Tourism and Recreation	Summary	The Owners therefore remain concerned that the impacts on the farming business as a whole have not been fully assessed and that the current extent of powers sought exceeds that which has been	The Applicant is confident that due to the temporary nature of the Scheme's construction works, and the ability for suitable compensation to be voluntarily agreed through Heads of Terms, that the farming business at this location will not be significantly affected. The Applicant is also

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			demonstrated to be reasonably necessary.	confident that the compulsory acquisition powers to deliver the Scheme are necessary, proportionate and justified, and satisfy the requirements of section 122 of the Planning Act 2008.

4.3 Vanessa Jayne Shipp

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
VJS-001	Socio-Economics, Recreation and Tourism	Grittleton House	The Impact of the Proposed Construction Compound on Grittleton House. Grittleton House is a family-run business that has been under the custodianship of the Shipp family for almost six decades and is now approaching its fourth generation of family ownership. More than simply a commercial enterprise, Grittleton House is an important part of the local community, providing employment, attracting tourism, supporting local suppliers and helping to sustain one of the area's most significant historic buildings. The house itself is a Grade II* listed Victorian manor house, widely regarded as one of the finest and best-maintained properties of its kind in the region. While the original	Grittleton House (NHLE 1022310) is considered within **ES Volume 3, Appendix 12-1: Heritage Statement [APP-219]**, which assesses its significance, setting and historic relationship with parts of the wider Grittleton Estate. The assessment concludes that, whilst the asset has a historic association with some land within the Scheme, it no longer maintains a relationship with those lands and there would be no harm to its significance or setting arising from the Scheme. The Applicant has assessed the impacts to employment and tourism in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and supporting **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**. Therein, the assessment covers impacts on the Grittleton Conservation Area as a visitor destination, rather than individual businesses, such as Grittleton House, within it. As a result of the findings of the assessment of its historic significant finding no significant adverse effect (see **ES Volume 3, Appendix 12-1 Heritage Statement [APP-219]**), and the location being screened out from full visual assessment **[APP-189]** due to

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			house dates back to the 17th century, the magnificent Victorian rebuilding created the impressive estate that stands today. The property boasts exceptional architectural features including a sweeping double staircase, original working fireplaces, a remarkable mahogany library, grand reception rooms and extensive landscaped grounds.	intervening vegetation, the main orientation of the house and lawns, and the temporary nature of construction works, it is not considered that there is any further socio-economic effect to Grittleton House beyond that which has been assessed as part of the likely effect to the Grittleton Conservation Area (temporary moderate-minor adverse effect), see **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**.
VJS-002	Socio-Economics, Recreation and Tourism	Grittleton House	However, heritage buildings of this scale do not maintain themselves. The ongoing preservation, repair and maintenance of Grittleton House requires substantial and continuous investment. The upkeep of the roof, stonework, grounds, gardens, infrastructure and historic interiors is only possible because the property operates as a successful wedding and events venue.	The Applicant is cognisant of the relationship between a building being in a viable use, and its appropriate maintenance, particularly when it is of heritage value. Whilst the Scheme has not directly assessed the effects on the business operations at Grittleton House, the Applicant has sought to mitigate adverse construction impacts to all receptors through the measures set out in the **Outline CEMP [REP3-092]**, which controls noise, lighting, dust, and personnel and vehicle movements. This is secured through Requirement 13 of Schedule 2 to the **Draft DCO [REP3-005]**.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			Quite simply, the business must thrive in order for the building to survive. Without a sustainable commercial operation, the future viability of the estate would be placed at risk. The loss of income resulting from reduced bookings could quickly lead to deferred maintenance, deterioration of the historic asset and ultimately threaten the long-term future of both the house and the family business. The Shipp family has dedicated generations to protecting and preserving Grittleton House, and the proposed development now places that future at significant risk.	
VJS-003	Socio-Economics, Recreation and Tourism	Grittleton House	The proposed construction compound would have a direct and highly damaging impact upon the business. Unlike many commercial operations, Grittleton House sells an experience. Couples	An assessment on the visual effects on Grittleton House was not undertaken within the **ES Volume 1 Chapter 8 Landscape and Visual [REP3-025]** as it was anticipated that, given the short term nature of the aspects of the Scheme located on the edge of Grittleton (Cable Route and associated compound), the

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			choose the venue because of its beauty, tranquillity, exclusivity and stunning surroundings. The views from the wedding lawn, principal grounds, luxury accommodation and many areas of the estate form a fundamental part of the product that guests are paying for. The proposed compound would be visible from key areas of the venue, including the wedding lawn, parts of the main house, bedrooms and grounds. It would fundamentally alter the outlook enjoyed by guests and significantly detract from the setting that couples expect when booking a premium wedding venue.	distance from the house (c450m) as an individual visual receptor and the intervening vegetation, Significant Adverse Effects were not anticipated. For the same reason, the settlement of Grittleton (RS009) was Scoped out of the LVIA. Whilst the Scheme has not directly assessed the effects on the business operations at Grittleton House due to its distance from the Cable Route and associated compound the Applicant seeks to engage with Grittleton House to understand their concerns, and to what extent dialogue with the Applicant or site operators would be required ahead of and during construction.
VJS-004	Socio-Economics, Recreation and Tourism	Grittleton House	The impact is not simply visual. Weddings are emotional, once-in-a-lifetime occasions. Couples spend many thousands of pounds to create memories and	With reference to **ES Volume 2 Figure 14-2 Daytime Operational Noise Contours [APP-160]**, noise levels from the Scheme at Grittleton House would be below 30 dB and therefore very unlikely to be perceived. During construction, results for R46, close to

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			photographs that will last forever. Any industrial compound, construction activity, associated noise, vehicle movements or visual intrusion has the potential to generate complaints, requests for compensation and negative reviews.	Grittleton House, presented in Table 14-19 of **ES Volume 1 Chapter 14 Noise and Vibration [REP1-021]**, show that average noise levels would be the same as the existing ambient environment. Whilst the Scheme has not directly assessed the effects on the business operations at Grittleton House due to its distance from the Cable Route and associated compound the Applicant seeks to engage with Grittleton House to understand their concerns, and to what extent dialogue with the Applicant or site operators would be required ahead of and during construction. The construction trips to Lime Down A,B and C don't route directly passed the house but the cable route access and compound will result in traffic routing passed the property. These trips would travel outside of network peak hours and not on bank holidays or Sundays and half days on Saturdays. There are two cable access junctions in this location so would generate 4 HGV's per day over 180 days.
VJS-005	Socio-Economics,	Grittleton House	Unlike temporary disruption, negative online reviews	The Applicant understands the impacts that publicity can have on a venue such as

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
	Recreation and Tourism		remain permanently visible to prospective customers. A poor review generated during the construction period does not disappear when the works are completed. It continues to influence future customers for years afterwards. The damage therefore extends well beyond the construction period itself and creates a long-term economic impact on the business.	Grittleton House, and as such, has sought to mitigate adverse construction impacts to all receptors through the measures set out in the **Outline CEMP [REP3-092]**, which controls noise, lighting, dust, and personnel and vehicle movements. This is secured through Requirement 13 of Schedule 2 to the **Draft DCO [REP3-005]**. Whilst the Scheme has not directly assessed the effects on the business operations at Grittleton House due to its distance from the Cable Route and associated compound the Applicant seeks to engage with Grittleton House to understand their concerns, and to what extent dialogue with the Applicant or site operators would be required ahead of and during construction.
VJS-006	Socio-Economics, Recreation and Tourism	Grittleton House	Equally concerning is the effect on prospective customers. Grittleton House is a seven-day-a-week business. Every week potential couples visit the venue to view the property and decide whether to book their wedding. The venue's setting, views and	Whilst the Scheme has not directly assessed the effects on the business operations at Grittleton House due to its distance from the Cable Route and associated compound the Applicant seeks to engage with Grittleton House to understand their concerns, and to what extent dialogue with the Applicant or site operators would be required ahead of and during construction.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			atmosphere are often the deciding factors in their decision.	
VJS-007	Socio-Economics, Recreation and Tourism	Grittleton House	Prospective clients visiting the venue and being presented with the sight of a major construction compound at the entrance to the village and within view of the venue will inevitably question how their wedding experience may be affected. Regardless of any assurances that disruption may be temporary, many couples will simply choose an alternative venue that does not carry such risks. In an increasingly competitive wedding market, even a small reduction in conversion rates can have a devastating financial impact.	Whilst the Scheme has not directly assessed the effects on the business operations at Grittleton House due to its distance from the Cable Route and associated compound the Applicant seeks to engage with Grittleton House to understand their concerns, and to what extent dialogue with the Applicant or site operators would be required ahead of and during construction.
VJS-008	Consultation and Engagement	Grittleton House	The location of the proposed compound is particularly disappointing given the apparent lack of meaningful consultation with one of the largest businesses in the area	As set out within **ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056]** temporary construction compounds located along the Cable Route Corridor have been located to minimise interaction with a number of constraints to allow construction

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			and one that is directly affected by the proposal. Grittleton House has not been properly consulted regarding the siting of the compound. No attempt has been made to understand how the business operates, what its customers value or how alternative locations could reduce the impact. A site visit eventually took place on 5th May, this was only from a heritage view point and only to look at their concerns, there have been no conversations around the economic impact. We were advised that there would be a report, to assess heritage concerns, and that we would receive a copy of the report and supporting information – this has still not been provided. The non-existent communication and engagement has left the business feeling excluded	vehicles to turn off the public highway and park safely: • Landscape and Visual: PRoW, residential receptors; • Ecology and Biodiversity: ponds, watercourses and vegetation; • Arboriculture: woodland, individual tress and hedgerows; • Hydrology, Flood Risk and Drainage: surface and fluvial flood risk areas, rivers; • Cultural Heritage: conservation areas, listed buildings, scheduled monuments, records of undesignated assets; • Transport and Access: potential access locations and disturbance to local roads; • Noise and Vibration: residential receptors; • Air Quality: residential receptors; • Socio-Economics, Tourism and Recreation: PRoW, local business premises; • Soils and Agriculture: minimising soil disturbance;

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			from a process that could significantly affect its future.	• Human Health: residential receptors; and • Ground Conditions: records of historic contamination A heritage-based site visit to Grittleton House was undertaken on the 5th of May with the WC Conservation Officer. Various photos were taken during the site visit, and permission was request for the use of the photos in a report (technical note) if needed as part of the examination of the Scheme. There is currently no intention to produce any additional heritage-based report on the Heritage Asset, the Applicant apologies for any confusion regarding this matter. As a result of the findings of the assessment of its historic significant finding no significant adverse effect as set out in **ES Volume 3, Appendix 12-1 Heritage Statement [APP-219]**, and the location being screened out from full visual assessment (see **ES Volume 3, Appendix 8-3-1 Visual Assessment Sheets (Not carried through to the ES Assessment) [APP-189]**) due to intervening vegetation, the main orientation of the house and lawns, and the temporary nature of construction works, it is not considered that there is any further socio-economic effect to

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Grittleton House beyond that which has been assessed as part of the likely effect to the Grittleton Conservation Area (temporary moderate-minor adverse effect), see **ES Volume 3, Appendix 16-2 Tourism and Recreation Receptor Tables [APP-241]**.
VJS-009	Site Selection and Alternatives	Grittleton House	The proposed location is particularly questionable given that it sits on land subject to compulsory acquisition and occupies a highly prominent position at the entrance to the village, adjacent to the village hall and directly affecting local residents and businesses. It is difficult to understand why more suitable locations have not been selected, particularly on land where landowners have willingly agreed to participate in the wider scheme and where the visual and economic impacts would be substantially reduced.	As set out in the **Land Plan [REP1-004]** document, the parcels 09-001, 09-002, 09-003, 09-004, 09-005 are subject to temporary use not compulsory acquisition of rights. The compound location is a function of the cable route and is necessary to provide access to north of the Motorway to allow HDD to facilitate the cable route to pass under the motorway.
VJS-010	Socio-Economics,	Grittleton House	This proposal must also be considered in the context of the wider challenges already	The Applicant is aware of these macro-economic factors and agrees that these present challenges to rural businesses,

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
	Recreation and Tourism		faced by rural businesses. Grittleton House has survived Brexit, the COVID-19 pandemic, unprecedented increases in operating costs, inflation, energy price rises, interest rate increases and ongoing economic uncertainty. Each of these events has required resilience, adaptation and significant financial sacrifice. The business has continued to invest, employ local people and contribute to the local economy despite these challenges.	especially those in competitive environments. The Applicant is committed to ensuring impacts to local employment and economic conditions are mitigated where practicable, and enhanced though the measures secured in the **Outline SSCEP [REP3-104]** by Requirement 18 of Schedule 2 to the **Draft DCO [REP3-005]**. Whilst the Scheme has not directly assessed the effects on the business operations at Grittleton House due to its distance from the Cable Route and associated compound the Applicant seeks to engage with Grittleton House to understand their concerns, and to what extent dialogue with the Applicant or site operators would be required ahead of and during construction.
VJS-011	Socio-Economics, Recreation and Tourism	Grittleton House	There comes a point, however, where another significant economic shock cannot simply be absorbed. The cumulative impact of reduced bookings, negative publicity, customer complaints and diminished visitor confidence could be enough	Please refer to VJS-010.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			to threaten the long-term sustainability of the business.	
VJS-012	Socio-Economics, Recreation and Tourism	Grittleton House	Grittleton House is not merely a wedding venue. It is an important heritage asset, a major contributor to the local economy, a supporter of local suppliers and trades, an employer and a long-standing member of the community. The continued success of the business directly supports the preservation of one of Wiltshire's most important historic houses. For these reasons we strongly urge that the proposed location of the construction compound be reconsidered and ultimately refused. Alternative locations should be explored that minimise the impact on local businesses, residents, heritage assets and the wider community.	Whilst the Scheme has not directly assessed the effects on the business operations at Grittleton House, the Applicant recognises that any local employment hubs will have a supporting supply chain and induced economic benefits for employees and where they spend earnings. The Applicant is committed to ensuring impacts to local employment and economic conditions are mitigated where practicable, and enhanced though the measures secured in the **Outline SSCEP [REP3-104]** by Requirement 18 of Schedule 2 to the **Draft DCO [REP3-005].** Whilst the Scheme has not directly assessed the effects on the business operations at Grittleton House due to its distance from the Cable Route and associated compound the Applicant seeks to engage with Grittleton House to understand their concerns, and to what extent dialogue with the Applicant or site operators would be required ahead of and during construction.
VJS-013	Socio-Economics,	Grittleton House	Should the proposal nevertheless proceed against our wishes, it is essential that	The Applicant will provide availability at the next opportunity and is keen to discuss the project in more detail with the owners of

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
	Recreation and Tourism		a robust, transparent and realistic compensation scheme is established for businesses that suffer demonstrable economic losses as a direct result of the development. Any such scheme must recognise not only immediate losses but also the longer-term damage caused by reduced bookings, reputational harm and diminished trading opportunities.	Grittleton House, particularly to address the specific concerns raised. Prior to and during the construction period, coordination will be supported by the Community Liaison Group, secured through Requirement 4 of the DCO, which will provide a formal and ongoing forum for the venue to manage its event schedule alongside the project's construction logistics.
VJS-014	Socio-Economics, Recreation and Tourism	Grittleton House	We welcome any decision-makers, inspectors, stakeholders or representatives involved in this process to visit Grittleton House (by appointment) and see first-hand the quality of the property, the importance of its setting and the scale of the impact that this proposal would have.	See response above to VJS-014
VJS-015	Socio-Economics,	Grittleton House	The Shipp family has spent nearly sixty years preserving this remarkable building for	The Applicant notes this comment and has sought to ensure that adverse effects from the Scheme can be mitigated in all cases. The

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
	Recreation and Tourism		future generations. We respectfully ask that equal consideration be given to protecting its future and ensuring that this cherished heritage asset, community resource and rural business is not placed at unnecessary risk.	Applicant is confident that the measures set out in the **Outline CEMP [REP3-092]**, as secured through Requirement 13 of Schedule 2 to the **Draft DCO [REP3-005]**, are sufficient to ensure the long-term viability of this business and heritage asset will not be significantly affected.
VJS-016	Socio-Economics, Recreation and Tourism Landscape and Visual	Grittleton House	The respondent provided images as part of the submission.	The Applicant notes this submission.

5 The Applicant's Responses to Members of the Public and All Remaining Organisations and Businesses

5.1 GDPR -LDSF-082

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
GDPR-001	Transport and Access	Equine Concerns	I am very concerned about the increase in traffic on the roads around here with all the construction traffic. I regularly ride my pony along the currently quiet roads and I am worried that it will become unsafe to do so.	The Applicant is proposing widening of Alderton Road and Fosse way up to 6m which would allow HGV's to pass Equestrians in line with the highway code. The proposals also include new permissive paths for equestrians. The Outline CTMP [REP3-108] includes measures to raise awareness of Non-Motorised Users. All construction workers and delivery drivers, will be trained and briefed of the following sections of the Highway Code relating to equestrian users as part of their site induction: - Pass horse riders and horse-drawn vehicles at speeds under 10 mph and allow at least 2 metres of space - Avoid revving engines; - Do not overtake unless signalled by rider; and - Stop engine where necessary
GDPR-002	Noise and Vibration	Equine Concerns	The noise levels will also increase which may upset my pony. I sometimes also ride with friends and we will not be	Operational noise levels produced once the construction of the solar farm has taken place will be minimal and mainly consist of a low frequency hum from the substation. The

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			able to do this if the construction of Lime Down goes ahead.	Applicant notes that the hearing of horses has greater sensitivity at high frequency ranges. They have poorer sensitivity at lower frequency ranges. Horses also habituate to lower frequency constant noises . Therefore, there would be no notable effect on the horses from the constructed site. Noise from construction is likely to have a greater effect. With noise from HGV's that may elicit a startle response, particularly if couple with coming into sudden field of vision. These effects can be reduced by temporarily reducing access to bridleways during construction times, reducing HGV movement during time of heavy horse riding activities, Widening of the roads to allow safe passing spaces, Enforcing a slower HGV speed when in equestrian areas, alerting local equestrians as to times where HGV traffic is likely to be greatest. Construction/piling is likely to increase noise levels but similar mitigation can be employed as above. Also the use of sound reducing techniques/barriers. Horses will also habituate to noises that do not have a negative effect on them in the first few times it occurs. Then there will be little or no effect to them.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
GDPR-003	Ecology and Biodiversity	Wildlife	I am also concerned about the local wildlife, recently while riding I heard a cuckoo which will never happen again if the countryside is scarred by the construction of Lime Down.	Cuckoos have been recorded at the Solar PV Sites during breeding bird surveys, as reported in **ES Volume 3, Appendix 9-4 Breeding Bird Survey Report [APP-201**]. Potential impacts on ecology and biodiversity are fully assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015].** The assessment 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 the delivery of biodiversity net gain. The assessment identifies embedded and additional mitigation measures and concludes that, with these measures in place, no significant adverse effects are anticipated for protected and notable species, with the exception of ground-nesting birds of open habitats and hedgerows. Residual significant adverse effects remain at a local level of geographical importance for skylark and hedgerows, and at the site level for other ground-nesting bird species. In relation to cuckoo, habitats likely to be of greatest importance within the Order Limits

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				include the network of woodlands, scrub and mature hedgerows. These habitats will be predominantly retained as part of the Scheme, with substantial additional habitat creation and enhancement also proposed through the Scheme design. Measures to minimise potential impacts on habitats and protected and notable species, and to secure ecological enhancements, will be secured through Development Consent Order (DCO) Requirements, including the **Outline LEMP [REP3-100**] and the **Outline EPMS [REP3-102].**

5.2 January Farrington

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
JF-001	Scheme Description and DCO Process	Submission Description	Response of January Farrington (REDACTED) to the Applicant's replies at Open Floor Hearing 1 (EXAM/9.19) and to the Examining Authority's First Written Questions	The Applicant has responded to JF's response to the ExA's First Written Questions within the **Applicant's Response to Other Parties' Responses to ExA Written Questions [EN010168/EXAM/9.45]**, Table 2-21.
JF-002	Socio-Economics, Recreation and Tourism	Equine	1. How has our farm actually been assessed? 1.1 The Applicant keeps saying has been "considered and assessed," and that it is "specifically and individually assessed" in Appendix 16-2 [APP-241]. But that assessment only looks at the immediate views from the farm and the hacking routes nearby. That is not an assessment of a working stud. It looks at views, access and recreational use, but not	**ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**, identifies West Park Farm as an equestrian business, and has assessed the likely impacts on the business premises in respect of visual impacts, noise, dust effects, and the likely impact to hacking routes. Whilst these were assessed primarily in respect of human receptors, it was not considered that additional assessment of equine receptors was proportionate given the availability of assessment information already presented. That notwithstanding, when assessing the likely impact on West Park Farm as an equestrian recreation receptor, additional consideration of horses in paddocks and on

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			at the things that actually matter to us: equine welfare and breeding, our broodmares, foals and youngstock, staff safety, insurance, bloodstock investment, operational as well as construction noise, the moving tracker panels, and the proximity of substation and battery (BESS) infrastructure. It ignores almost everything I raised in my Relevant Representation, my Written Representation and my oral submission.	hacking routes was considered as part of the determination of the significance of effect. The Applicant confirms that assessment of the business operations was not assessed in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**, as assessment of individual businesses was scoped out of assessment, with this methodology agreed by the Secretary of State in their Scoping Opinion adopted on 22 August 2024. That notwithstanding, the Applicant confirms that an additional assessment of impacts on equine businesses is being undertaken in response to the request issued at SE1.9 in the **Examining Authority's First Written Questions [PD-010]**. This is due to be submitted at Deadline 5. The Applicant recognises that horses are more sensitive to noise, movement, and air quality than humans. The Applicant is confident that the mitigation measures secured through the **Outline CEMP [REP3-092] and Outline OEMP [REP3-094]** by

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Requirements 13 and 14 respectively of Schedule 2 to the **Draft DCO [REP3-005]** are sufficient to ensure significant adverse effects to horses (and thus on equestrian businesses) can be avoided. These measures have been reviewed and confirmed by a certified equine veterinarian who has been instructed to advise the Applicant during the examination process. The Applicant also confirms that an additional assessment of impacts on equine businesses, including horse behaviour and health, is being undertaken in response to the request issued at SE1.9 in the **Examining Authority's First Written Questions [PD-010]**. Noting this report will be submitted at Deadline 5, the Applicant's expert asserts that horses will habituate to noises that do not have a negative effect on them in the first few times it occurs. Then there will be little or no effect to them. There is no evidence that BESS and solar farms, when operational negatively impact the health of horses. There is no literature

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				available stating that they negatively impact either the respiratory health or the fertility of equines. Young foals will habituate to noises. They are very neuroplastic and learn quickly. They also respond to their mothers response to situations. Although any equine will react to a novel stimuli that it perceives as a threat, it adapts to non threatening stimuli. This is the process of habituation. Studies to be cited within the Applicant's forthcoming assessment in response to ExQ SE1.9, have shown that they may react for less time than their older counterparts. Thoroughbred foals are normally born early in the year so mitigation can include avoiding paddocks used by young foals during these periods. The Applicant confirms that whilst assessment of the recreational aspect of equestrian facilities was assessed, the assessment of the business operations at West Park Farm was not assessed in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**, as

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				assessment of individual businesses was scoped out of assessment, with this methodology agreed by the Secretary of State in their Scoping Opinion adopted on 22 August 2024.
JF-003	Socio-Economics, Recreation and Tourism	Equine	1.2 No one acting for the Applicant has ever been to , and before I sent my representations no one asked me a single thing about our business. So, I do not understand how it can have been "individually assessed" at all. It looks like a desk study done by someone who does not know what actually happens here.	Initial observations were made onsite by the Applicant's landscape and visual impact assessment consultants from Lime Down D and public rights of way to determine the visual relationship between West Park Farm and Lime Down D. This was followed by a desk-based search by the socio-economics consultant for business information at West Park Farm to identify the nature of operations. Whilst the physical extent of paddocks, buildings, and stabling was evident, the type of operations could not be determined from information available online or advertised 'on-the-ground'. West Park Farm was assessed as an Equine business with clientele most likely to be from the surrounding area (Wiltshire and Gloucestershire).

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
JF-004	Socio-Economics, Recreation and Tourism Consultation and Engagement	Equine	1.3 I asked the Applicant directly, by email on 2 June 2026, how the assessment was done and whether they knew anything about our business beforehand. Two weeks later I still have no real answer only a holding reply (Annex A). If our farm had genuinely been assessed properly, they should be able to tell me how, and by whom.	The Applicant regrets the delayed response to Mrs Farrington, and confirms a reply was issued by email on 26th June 2026.
JF-005			2. There will be a significant effect on [REDACTED] 2.1 The Applicant says that because there is "a buffer of approximately 500m" to the Order Limits, there will be "no significant effects" and "no significant residual effects." A buffer (distance not confirmed) does not stop	The Applicant confirms that this reference to a 500 m buffer was made in reference to noise impacts on residential receptors, and as such is in respect of the approximate distance from the residential property at West Barn Farm to the Order Limits. With reference to **ES Volume 2, Figure 14-2 Daytime Operational Noise Contours [APP-160]**, noise levels from the Scheme at 500m would be below 30 dB and therefore very unlikely to be perceived. <u>Dust</u>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			noise, traffic, dust, lighting and disturbance.	In relation to dust, the Applicant does not rely on separation distance alone to conclude that dust effects would not be significant. The construction dust assessment (**ES Volume 3, Appendix 15-1 Construction Dust Methodology and Assessment [APP-238]**) follows the Institute of Air Quality Management (IAQM) construction dust guidance, which defines a precautionary 250 m study area around the Order Limits and along construction routes based on where dust effects may occur. Within this study area, sensitive receptors are identified and the unmitigated dust risk is assessed. In line with the IAQM methodology, this risk is then used to define appropriate mitigation, which is secured through the **Outline CEMP [REP3-092]** (e.g. dust suppression, wheel washing and trackout control). With these measures in place, the construction dust effects would not be significant either within the study area, or beyond it. The construction traffic is manged through the **Outline CTMP [REP3-108]** to limit its impact as far as possible. Measures such as

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Traffic management measures, signage, restrictions of delivery times, banksmen, induction for drivers, booking system, wheel wash facilities, noise reduction measures, community engagement and traffic monitoring, The Applicant has undertaken an LVIA set out in **ES Volume 1, Chapter 8 Landscape and Visual [REP3-025]** with consideration of the appropriate and relevant guidance that 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 views and visibility. Within the LVIA, the assessment of effects upon residential properties has been undertaken from the curtilage of residential properties where publicly accessible unless other arrangements are agreed with individual residents to gain access to their property. Professional judgement has been used to assess views from residential

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				properties aided by the ZTV, aerial photography and LVIA figures. Within the LVIA, West Park Farm has been identified as Visual Receptor RG029 and the assessment of visual effects is set out within **ES Volume 3, Appendix 8-3-2-1 Visual Assessment Sheets (Non-Significant) [APP-190]**. The LVIA recognises that there would be Minor Adverse (but not Significant) effects to residents of this group of properties for the duration of the Development.
JF-006			2.2 Breeding thoroughbreds are extremely sensitive. Mares in foal and at foot, and young stock, startle and bolt. That risks injury to the horses and to people, lost condition, and the loss of a breeding season we can never get back. The Applicant's own assessment already admits "up to a moderate-minor adverse effect" from views and hacking alone, it has	The Applicant recognises that horses are more sensitive to noise movement, and air quality than humans and refers to the response in JF-002 The Applicant is confident that the mitigation measures secured through the **Outline CEMP [REP3-092]** and **Outline OEMP [REP3-094]** by Requirements 13 and 14 respectively of Schedule 2 to the **Draft DCO [REP3-005]** are sufficient to ensure significant adverse effects to horses (and thus on equestrian businesses) can be avoided. These measures have been reviewed and

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			simply not looked at the effect on the stud as a business. It keeps concluding there will be "no significant effects," but it has used no equine-specific method and has shown no evidence of how it reached that conclusion for a breeding stud like ours.	confirmed by a certified equine veterinarian who has been instructed to advise the Applicant during the examination process. The Applicant confirms that whilst assessment of the recreational aspect of equestrian facilities was assessed, the assessment of the business operations at West Park Farm was not assessed in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**, as assessment of individual businesses was scoped out of assessment, with this methodology agreed by the Secretary of State in their Scoping Opinion adopted on 22 August 2024.
JF-007			2.3 Treating equine businesses as "of local importance and therefore low sensitivity" [APP-068] underplays both how sensitive the animals are and how much studs here matter to the wider bloodstock economy. Other interested parties have given evidence	Paragraph 16.10.38 of **ES Volume 1, Chapter 16 Socio Economics, Tourism and Recreation [APP-068]** states: "Private facilities are considered to be of local importance and therefore low sensitivity, *whilst riding schools, liveries and studs, or equine care businesses are considered to be of medium sensitivity due to their prevalence and combined*

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			on equine health and construction noise (REP1-158, REP1-202 and REP1-214), on electromagnetic fields, and on harm to a stud business (REP1-191). And the uncertainty has already forced us to pause investment. This is a real effect now, not a hypothetical one.	*recreational and economic importance within the local area.*" As stated, West Park Farm was identified as an equestrian business (albeit erroneously as a livery rather than a stud farm) and was therefore designated a medium sensitivity where assessed in **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]**. The Applicant has sought to ensure all mitigation measures required to control construction noise, dust and air pollution, and operational effects are secured through the **Outline CEMP [REP3-092]** and **Outline OEMP [REP3-094]** by Requirements 13 and 14 respectively of Schedule 2 to the **Draft DCO [REP3-005]**. The Applicant considers the level of detail provided at this point to be appropriate for determination of the DCO, and confirms that the Applicant is obliged to provide detailed information for approval by Wiltshire Council ahead of any construction activities being undertaken. There is no evidence or literature supporting that constructed solar farms negatively

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				impact the health or fertility of horses. There are mitigation factors put in place to reduce disturbances from light, noise, traffic pollution. Construction disturbances will be temporary and equines will habituate to continuous noise and will learn that when there is no negative impact from construction noise, they will no longer react. They may visually observe from a distance, but this is no greater reaction than any other novel object suddenly appearing in their vision. They do not rely on magnetoreception or magnetic fields for navigation. Their nervous system is not unusually sensitive to low frequency electromagnetic fields. Research has shown no consistent behavioural changes with low frequency electromagnetic fields and no evidence of stress responses. Further information will be provided in the forthcoming report providing additional assessment of impacts on equine businesses, including horse behaviour and health in response to ExQ SE1.9 in the

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Examining Authority's First Written Questions [PD-010].
JF-008			3. Our horses are not an ordinary "recreation" receptor 3.1 The Applicant assesses noise on horses using the human noise threshold, but the risk to a horse is not about how it "processes" decibels. It is the sudden startle and flight response, an unpredictable reaction to an unfamiliar noise, machine or person that can make a 500kg animal bolt, hurt itself, hurt a handler, or lose a foal. A human comfort threshold does not measure that.	The Applicant refers firstly to the response set out in JF-002. As horses habituate to constant low levels of noise, with research showing it takes between 1 and 7 repeats of a noise for habituation to occur. If the noise has not caused an aversive experience for the horse during one of these times, it habituates (learns) that the noise is not a threat and no longer reacts to it. Mitigation measures including clear communication of construction working periods in close proximity to Equine Facilities would be provided via the Community Liaison Group (CLG), with concise information of the type of work to be undertaken to ensure that impacts during these periods can be mitigated and no unexpected single instances of noise would occur. The Applicant is cognisant that horses are flight or fight animals and a prey species. Therefore their primary survival instinct is to flee from a perceived threat that elicits a fear response. They will typically respond

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				aversively to loud, sudden or unexpected noises, or sudden movements that are within their flight zone (5-30 metres). Mitigation factors to reduce disturbance by noise and when working near paddocks being used nearby that contain equines are provided. However, the equines will still habituate to any threat that does not cause them harm through the process of learning.
JF-009			3.2 The British Horse Society quote the Applicant relies on is about glint and glare from panels. My concerns are about construction, noise and electromagnetic fields not just glare. "No evidence" about glare does not answer them. And telling me horses "adapt quickly" is no comfort when the construction would run for years right next to our foaling paddocks.	The **ES Volume 3, Appendix 20-5 High-Level Electromagnetic Field Assessment [APP-262]** has considered potential EMF impacts within proximity of the development in accordance with ICNIRP reference thresholds and found that none of the electrical equipment within the site would breach the reference thresholds even for a hypothetical receptor directly above the 400kV Grid Connection Cables. Magnetic field strength decreases rapidly as the separation distance increases due to free space path loss (which follows an inverse square law), meaning that for receptors more than 10m horizontally away from the 400kV cable route, magnetic field strength would be lower than typical values for a

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				vacuum cleaner operating 1m from a receptor. The construction traffic is manged through the **Outline CTMP [REP3-108]** to limit its impact as far as possible. Measures such as Traffic management measures, signage, restrictions of delivery times, banksmen, induction for drivers, booking system, wheel wash facilities, noise reduction measures, community engagement and traffic monitoring. Specific measures are also included in relation to equestrians. The Applicant confirms that horses do not rely on magnetoreception or magnetic fields for navigation. Their nervous system is not unusually sensitive to low frequency electromagnetic fields. Research has shown no consistent behavioural changes with low frequency electromagnetic fields and no evidence of stress responses. The Applicant also confirms that an additional assessment of impacts on equine businesses, including horse behaviour and health, is being undertaken in response to the request issued at SE1.9 in the

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Examining Authority's First Written Questions [PD-010].
JF-010			4. Surveyors on our land without permission (CA I.5) 4.1 On 3 June 2026 we found two surveyors from Storm Geomatics inside one of our electric-fenced paddocks, working for the Applicant. We had not been asked and had given no permission. They carried a letter from Arthian saying landowners had been contacted but it appears we and others have not. We only realised because our mares and foals were galloping around in alarm.	The Applicant acknowledges the concern raised. Following notification of this incident, the Applicant immediately stopped the relevant survey activity while the matter was investigated. Survey activity only resumed on land within the Scheme's order limits. It was identified that, although access permission had been agreed elsewhere, permission had not been requested or granted for access to this land. The Applicant apologised directly to the landowner at the time and confirmed that no further access would take place without their express agreement.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
JF-011			4.2 The Applicant apologised and told me "the surveyors should not have entered your property," and that surveys had been "paused" as soon as I emailed (Annex B). But the surveying did not actually stop. The very next day, Thursday 4 June, they were surveying the Gauze Brook in Area E (off Avril's Lane), and they carried on until Friday 12 June when they back on Mill Lane.	Please refer to JF-010 and JF-012. Following the incident referred to, survey activity was paused on land where third-party landowner permission was required while the matter was reviewed. Survey activity did continue elsewhere, but only on land within the Scheme where the Applicant had the necessary control or access rights in place and no further third-party permission was required.
JF-012			4.3 We are also aware of other stretches the surveyors have simply gone onto without asking. The pattern seems to be that they go ahead regardless and only ask permission if they happen to come across the right person.	Please refer to JF-011. In addition, the Applicant has reminded the relevant teams that access to private land must not take place without the necessary permission being in place. Where concerns have been raised about access, these have been taken seriously and investigated.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
JF-013			4.4 The Applicant says this work is to gather data on the Gauze Brook because "there is no data of this nature held by statutory bodies." That leaves two possibilities, and both matter for question CA I.5 and for how much weight can be given to their evidence: either the Gauze Brook was not modelled before the DCO was submitted, so their flood and environmental baseline is incomplete, or they had already been on our land before without us knowing.	The Applicant notes the comments and does not accept the suggested binary interpretation. The statement that no data of this nature is held by statutory bodies refers to the absence of an existing Environment Agency hydraulic model for Gauze Brook. It does not mean that Gauze Brook was unassessed within the submitted application. Flood risk from Gauze Brook was assessed in the submitted application through **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP3-015]** and **ES Volume 3, Appendix 11-6: Flood Risk Assessment and Drainage Strategy - Lime Down D / BESS [REP3-057]**. That assessment used the best available flood risk information at the time, including Environment Agency mapping, LiDAR, topographic information and site-specific assessment. Survey information was obtained where access was available, principally within the Order Limits and within the landholdings of

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				supporting landowners. Where survey access was not available, LiDAR and other available topographic datasets were used. This is a normal and proportionate approach for flood risk assessment and hydraulic modelling. The further survey and modelling work referred to by Ms Farrington is being undertaken to investigate whether there is potential for flood alleviation, catchment management or natural flood management measures in and around Gauze Brook to provide a meaningful community benefit. It is not being undertaken because the submitted flood risk baseline was absent or because Gauze Brook had not been assessed. The updated Gauze Brook modelling is reported in the **Hydraulic Modelling Report [REP3-131]**. That report includes the 3.3% AEP, 1% AEP and 0.1% AEP events, climate change scenarios and sensitivity testing. It provides refined hydraulic evidence for Gauze Brook at Lime Down D.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				The additional community benefit work will use the updated model to test whether workable flood alleviation or natural flood management measures could produce a meaningful benefit for Corston and downstream communities. Any such measures would be separate from the mitigation required to make the Scheme acceptable and are not relied upon to demonstrate that the Scheme would be safe or would not increase flood risk elsewhere. The Applicant therefore confirms that Gauze Brook was assessed using the best available evidence, supplemented by survey where access was available and LiDAR where it was not. The further work is a refinement of the evidence base and a voluntary investigation of potential community benefit, not a correction of an absent baseline.
JF-014			4.5 I would ask the Examining Authority to press the Applicant on: when and how the Gauze Brook was modelled for the application;	See response to JF-013

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			exactly what survey access has been taken across [REDACTED] and along the Gauze Brook, where, and under what authority; and how needing more access now fits with their claim that our farm has already been fully assessed.	
JF-015			6. What I am asking from the Applicant: • explain, properly, how should was assessed, by whom, and on what information;	The Applicant has set out the assessment process undertaken ahead of DCO submission in its responses to 'JF-002' to 'JF-007' above. The Applicant also confirms that an additional assessment of impacts on equine businesses has been undertaken in response to the request issued at SE1.9 in the **Examining Authority's First Written Questions [PD-010]**.
JF-016			• look again at treating equine businesses as "low sensitivity" recreation receptors; and	Please refer to the Applicant's response to 'JF-007' above. While private equestrian facilities were considered as "low sensitivity" receptors (see paragraph 16.10.38 of **ES Volume 1, Chapter 16 Socio Economics, Tourism**

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				and Recreation [APP-068]), West Park Farm was identified as an equestrian business and therefore designated a medium sensitivity in **ES Volume 3, Appendix 16-2 Tourism and Recreation Receptor Tables [APP-241]**, due to its recognised economic function in the local area.
JF-017			• account for all the survey access taken on our land and along the Gauze Brook, and the basis for the powers they are seeking.	The Applicant notes the comment. From a hydrology perspective, the submitted flood risk assessment did not rely on unrestricted survey access across all third-party land. Survey information was used where access was available, principally within the Order Limits and within the landholdings of supporting landowners. Where survey access was not available, LiDAR and other available topographic datasets were used. Flood risk from Gauze Brook was assessed in the submitted application through **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP3-015]** and **ES Volume 3, Appendix 11-6: Flood Risk**

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Assessment and Drainage Strategy - Lime Down D / BESS [REP3-057]. The further Gauze Brook survey and modelling work is being used to refine the evidence base and to test whether potential flood alleviation, catchment management or natural flood management measures could provide a meaningful community benefit. It is not relied upon to correct an absent flood risk baseline or to demonstrate that the Scheme is acceptable in flood risk terms. The Applicant therefore considers that the hydrology and flood risk assessment remains appropriately based on the best available evidence, supplemented by survey where available and LiDAR where survey access was not available.

5.3 Jill Antonia Nash

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
JAN-017	Ecology and Biodiversity Landscape and Visual		This beautiful countryside will be ruined the wildlife destroyed, solar panel should be on rooftops not fields.	Potential impacts on ecology and biodiversity are fully assessed in **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015].** The assessment 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 the delivery of biodiversity net gain. The assessment identifies embedded and additional mitigation measures and concludes that, with these measures in place, no significant adverse effects are anticipated for protected and notable species, with the exception of ground-nesting birds of open habitats and hedgerows. Residual significant adverse effects remain at a local level of geographical importance for skylark and hedgerows, and at the site level for other ground-nesting bird species. Measures to minimise potential impacts on habitats and protected and notable species, and to secure ecological enhancements, will be secured through Development Consent Order (DCO) Requirements, including the

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Outline LEMP [REP3-100] and the **Outline EPMS [REP3-102]**. The Applicant has undertaken an LVIA, set out in **ES Volume 1, Chapter 8 Landscape and Visual [REP3-025]** with consideration of the appropriate and relevant guidance that 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 views and visibility. **ES Volume 1, Chapter 8 Landscape and Visual [REP3-025]** acknowledges that there would be there would be an immediate change to the character of the Sites themselves and their immediate surroundings as they change from an area of arable farmland to solar infrastructure with the LVIA recording Significant Adverse effects on the character of the Landscape (including within the Lime Down Sites) through to the establishment of the Mitigation planting as a result of the Scheme and the change from agricultural land to a solar infrastructure. However, with the establishment of the landscape mitigation the introduction of the

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				solar arrays and other associated infrastructure would not become a defining feature on the landscape once operational. The strong framework of existing vegetation across the Scheme as well as the rolling topography and wooded nature of the Hullavington Rolling Lowland would provide the structure for the Scheme to be set comfortably and not become wholly intrusive within the landscape. The existing vegetation would act as a backdrop for the panels and help them to integrate into the countryside surrounding. 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 to the National Electricity Transmission System enables their benefits to be felt more widely, which is a key benefit of the scheme.

5.4 Kim Langley

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
KL-001	Socio-Economics, Recreation and Tourism	Tourism and Hospitality	Lime Down Solar Park will have a devastating impact on tourism and hospitality business's. It's location is badly thought out and will impact business's like ours. We have a bed and breakfast located in an area of outstanding beauty. We also offer ceramic and art courses. Clients come for the tranquility that the area offers so they can recover from their stressful lives, watch the local wildlife out of the windows and the diary heards in the feilds.	The impact from the Scheme on tourism and visitors has been assessed in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]**, which finds no significant adverse effect to the tourism industry Whilst the Applicant acknowledges construction activities at Lime Down B may be visible from Greyfox House, it is at a distance of approximately 650 m with more direct views of the Scheme only anticipated to clients approaching from Norton/the south. The Applicant therefore does not consider that the Scheme is likely to significantly deter clients from the B&B and ceramics businesses being commented upon at this location. With regard to local wildlife, as the bed and breakfast is located wholly outside the Order Limits, no direct impacts on habitats or wildlife associated with the property are anticipated. Measures set out in the **Outline CEMP [REP3-092]** have been incorporated to avoid indirect impacts on a wide range of ecological features both within and outside the Order Limits during the construction phase. Further measures are provided within the **Outline EPMS [REP3-**

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				102], particularly Method Statement 3, which sets out pollution prevention measures. Through implementation of these measures, no significant adverse effects on wildlife in the vicinity of the property are anticipated.
KL-002	Socio-Economics, Recreation and Tourism Glint and Glare Transport and Access	Tourism and Hospitality	Our deb and breakfast is one side of the road, on the other will be a solar park with its constant humming 24 hours a day, glare from the panels themselves, the unsightly panels, the construction and it's traffic will be a total turn off for any Clients who come to enjoy the area.	Solar farm infrastructure would be over 300m away from the bed and breakfast and associated noise would be below 30 dB during the day and inaudible at night. No solar reflections are geometrically possible towards this property from fixed panels. For tracking panels, it is predicted that existing vegetation and terrain will significantly screen views of the reflecting areas, such that no solar reflections are expected to be visible in practice. The construction traffic is not significant in numbers, 50 HGVs on Alderton Road and Fosse Way over a weekday and 56 per day on Bradfield Cottages, The construction deliveries are outside of network peak hours, bank holidays, will run for half day on Saturday and not on Sundays. The construction phase is also temporary and some phases will finish earlier than others reducing any perceived impact.
KL-003	Socio-Economics,	Cycling	Cyclists who stay.to tour the area will not want to come from the industrial city's and	The assessment in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and supporting **ES Volume 3,**

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
	Recreation and Tourism		towns to the industrialised countryside of a sea of solar panels and the noise they create.	**Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]** assesses impacts on cycling routes, and identifies a significant adverse effect on the Wiltshire Cycleway during construction (and as such this will have to be considered in the planning balance when the DCO is determined), but not during operation. In item NV1.9 of the Applicant's Response to the Examining Authority's First Written Questions [REP3-128] the matter of noise levels on PRoW users, including cyclists, is discussed. In summary the levels from the Scheme would range from inaudible to those associated with regular conversation. Such routes would therefore continue to be useable for visitors and cyclists touring the area.
KL-004	Socio-Economics, Recreation and Tourism	Tourism	The finacial impact will be huge, as this will have a 'nock on effect' a decline in tourists to the area, lose of income to those how have business's in the area of tourism. If Lime Down Solar Park goes ahead it will mean the devastation of tourism, loss of jobs and.ultimately loss of taxes this government needs.	The assessment in **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]** and supporting **ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]** estimates a worst-case loss of up to 50 FTE employees and £1.76 million in visitor spending during the construction of the Scheme. The Applicant has sought means to minimise this through focusing on local recruitment, promoting local suppliers where practicable, and through

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				providing retraining opportunities for workers in tourism-dependent industries. This is secured in the **Outline SSCEP [REP3-104]** by Requirement 18 in Schedule 2 to the **Draft DCO [REP3-005]**.

5.5 Vivienne Jane Clarke

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
VJC-001	Description and DCO Process	Response to Written Representations	Response to Applicant's Comments on Written Representations so far as it relates to Vivienne Jane Clarke [REP2.039] pages 1420 et sec 9.22 Notwithstanding the lengthy responses, the Applicant has failed properly to address the points made in my Written Representations but has made concessions, the importance of which I request need to be considered.	The Applicant notes this comment and has addressed the concerns in full below [VJC-002 to VJC-021].
VJC-002	Description and DCO Process Site Selection and Alternatives	Duration of Scheme and Land Rights	At page 1424 of REP2.039 the Applicant refers to having given an example of the duration of the rights it has over one part of the Scheme at REP1A012 Page 24. Upon looking at this comment post ISH1 it shows that part of the land in Lime Down E is for a maximum of 40 years based on an agreement reached in	The Applicant directs the respondent to page 359 of the **Applicant's Response to the Examining Authority's First Written Questions [REP3-128]** at GCT1.11 where maximum lease terms for the Solar PV Sites have been provided. Further clarifications on landowner negotiations engagement were provided in **The Applicant's Response to Written Representations [REP2-039]** at VJC-003, CFP-001, CFP-002, CFP-003 & CFP-004

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			2023. It is referred to as an example. This strongly suggests that the landowner concerned was not aware that the application would be for a scheme of up to 60 years of operation – plus around 5 years for construction and decommissioning. What the landowners were told by the Applicant when agreeing "voluntarily" to provide their land is relevant, particularly in the light of the importance placed on this in the context of the Applicant's stated basis for site selection. I welcome the ExA's written question seeking further information about the land rights the Applicant has for each part of the Lime Down site and whether the landowners were aware of the extent and duration of the Scheme and the size of the proposed panels.	

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
VJC-003	Description and DCO Process Climate Change and Energy Need	Scheme Duration and Climate Impact	The response at page 1424 refers to the 60 year operational period representing the reasonable worst case taking account of GHG emissions but if all or some of the land is only available for 40 years, of which 5 years will be construction and decommissioning, I question will this not only increase the damage by reducing the claimed clean energy benefit to 35 years rather than the 60 years on which the documents prepared by the Applicant are based?	The Applicant directs the respondent to page 359 of the **Applicant's Response to the Examining Authority's First Written Questions [REP3-128]** at GCT1.11 where maximum lease terms for the Solar PV Sites have been provided. The Applicant has included the GHG assessment at 40 years in the Climate Response to **Wiltshire Council Appendix B of Written Rep and SLD Appendix J1 [REP3-132]**. Furthermore, please see the **Written Summary of the Applicant's Oral Submissions and Responses at Issue Specific Hearing 1 and Responses to Action Points [REP1A-012]** which addresses this further at page 24. In a 40-year scenario, the total GHG emissions are predicted to be 736,869 tCO2e instead of 933,140 tCO2e for a 60 year period. However, there would also be less renewable energy generated during the operational life of the Scheme and this would reduce the net saving over the Scheme's lifetime from 253,839 tCO2e to 14,256 tCO2e using the methodology set out in **ES Volume 1, Chapter 7: Climate Change [APP-059]**.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
VJC-004	Arboriculture Construction and Decommissioning	Watering and Maintenance of New Planting	Watering and maintenance of new planting In my WR I raised the issue of the watering of newly planted hedges and trees and plants forming part of the mitigation and how the water was to be delivered, and how much and how often which is unclear. The Applicant's response (at page 1446) other than referring to a proposed LEMP does not properly address this and appears to be a stock answer – but not to the point raised.	The watering of new planting is principally a landscape establishment and maintenance matter. The detailed requirements for watering, replacement planting and aftercare will be confirmed through the detailed LEMP, secured by Requirement 12 of the **Draft DCO [REP3-005]** and prepared substantially in accordance with the **Outline LEMP [REP3-100]**. The **Outline Water Resources Strategy [APP-290]** provides an early-stage evaluation of quantities of water required for the Scheme during construction and operation and where the Applicant is likely to resource these demands. The Applicant recognises that the land is currently in agricultural use and that access for watering must therefore be managed to avoid unnecessary soil disturbance, rutting, compaction or interference with existing drainage features. From a hydrology perspective, establishment watering would be temporary, intermittent and dependent on weather and planting requirements. It would not represent a continuous operational water demand and would not require uncontrolled abstraction from watercourses or groundwater. Any water required for establishment would be obtained from authorised supplies. Where water

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				is delivered to planting areas, the method of access and delivery would be managed through the relevant construction, landscape and soil management controls, including the **Outline Construction Environmental Management Plan [REP3-092]** and **Outline Soil Resources Management Plan [REP3-098]**. The Applicant therefore does not consider that the watering of new planting gives rise to a material hydrology, flood risk or drainage effect.
VJC-005	Arboriculture Construction and Decommissioning	Watering and Maintenance of New Planting	I specifically asked "Where is the water going to come from? If by tanker, where are the figures for this in the Applicants' traffic and other chapters?" Once again the response did not address the question. Applicant's response "The Scheme is not a residential development and does not create a material operational water demand comparable to housing or domestic water use. The existing baseline is agricultural land. That land already receives rainfall and supports crop growth, with	The Applicant notes the comment. Water required for establishment of new planting would be obtained from authorised supplies. It would not rely on uncontrolled abstraction from watercourses, ponds or groundwater. The **Outline Water Resources Strategy [APP-290]** provides an early-stage evaluation of quantities of water required for the Scheme during construction and operation and where the Applicant is likely to resource these demands. The final watering regime, including frequency, method of delivery and duration, will be confirmed through the detailed LEMP, secured by Requirement 12 of the **Draft DCO [REP3-005]** and prepared substantially in accordance with the **Outline LEMP [REP3-100]**. This is appropriate because watering requirements will

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			water used through evapotranspiration and, where undertaken, seasonal agricultural operations including irrigation during drier periods. The proposed solar use would not introduce a continuous household-type potable water demand. Operational water demand would be limited and intermittent, principally associated with maintenance activities such as occasional panel washing where required. Panel washing, if required, would be periodic rather than continuous and would be undertaken using authorised water supplies. It would not rely on uncontrolled abstraction."	depend on the final planting specification, planting season, weather conditions and establishment success. Where water is delivered by bowser or tanker, those movements would be temporary and intermittent. They would be managed through the relevant construction, access and landscape management controls. They would not represent a continuous operational water demand. Access for watering would also be managed to avoid unnecessary soil compaction, rutting, runoff or damage to drainage features, in accordance with the **Outline Construction Environmental Management Plan [REP3-092]** and **Outline Soil Resources Management Plan [REP3-098]**. The Applicant therefore does not consider that establishment watering gives rise to a material hydrology, flood risk or drainage effect.
VJC-006	Arboriculture Construction and Decommissioning	Watering and Maintenance of New Planting	There are references to watering in {APP-283} Outline Landscape and Ecological Management Plan (OLEMP) (but not in [REP1-107] Outline Ecological Protection	The Applicant apologises for the erroneous reference to the **Outline Protection and Mitigation Strategy [REP3-103].** The Applicant directs to para 1.3.30 of the **Outline LEMP [REP3-100]**, which states:

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			and Mitigation Strategy (OLPMS) (Rev 2) (Tracked), to which the response also refers. For example, OLEMP para. 1.3.45 states that 'All trees and shrubs will be regularly watered in the first summer and thereafter as required to ensure successful establishment', and the same applies to new woodlands (although I note para. 1.3.30 states that 'Newly planted hedgerows shall be regularly watered in their first summer' (emphasis added), but it's not clear if hedgerows count as 'trees and shrubs' and if not, whether they would ever be watered again.	*"Newly planted hedgerows shall be regularly watered in their first summer and weeds shall be controlled through the use of bark mulch. A 75 mm layer of bark mulch 0.5 m either side of the hedge will be spread along the length of the hedge immediately after planting to suppress weeds and retain soil moisture."* The Applicant confirms that the reference to 'trees and shrubs within paragraph 1.3.45 under the 'Hedgerow Tree Management' subheading in the **Outline LEMP [REP3-100]**, extends to all planted hedgerow stock. Monitoring of the establishment of newly planted habitats, including hedgerows is included as part of the outline monitoring strategy in section 1.4 of the **Outline LEMP [REP3-100].** This monitoring will identify any issues and will determine whether any remedial measures are appropriate to ensure habitats (including hedgerows) establish as intended. Appropriate remedial measures may include additional watering.
VJC-007	Arboriculture Construction and Decommissioning Transport and Access	Watering and Maintenance of New Planting	The Applicant appears to consider that young saplings and hedging can be treated in the same way as crops. Although there is reference to crops being irrigated during drier periods (not something I	The **Outline Water Resources Strategy [APP-290]** provides an early-stage evaluation of quantities of water required for the Scheme during construction and operation and where the Applicant is likely to resource these demands.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			am aware of happening in our area) there is no answer to my question about where the water is going to come from and, if by tanker, why this does not appear in their traffic and other chapters. There appear to be no plans in the OLEMP for watering after the first summer.	The final watering regime, including frequency, method of delivery and duration, will be confirmed through the detailed LEMP, secured by Requirement 12 of the **Draft DCO [REP3-005]** and prepared substantially in accordance with the **Outline LEMP [REP3-100]**. This is appropriate because watering requirements will depend on the final planting specification, planting season, weather conditions and establishment success.
VJC-008	Arboriculture Construction and Decommissioning Transport and Access	Watering and Maintenance of New Planting	Could the Applicant be asked to explain how it intends to ensure the regular watering of newly planted hedgerows, trees and shrubs and the source and amount of the water to be used, the method of transportation and delivery to be used and whether this is only to be in the first summer after planting. And, whether this will be during the construction phase or after it, and how they can ensure that this will not cause soil compaction.	The **Outline Water Resources Strategy [APP-290]** provides an early-stage evaluation of quantities of water required for the Scheme during construction and operation and where the Applicant is likely to resource these demands. The final watering regime, including frequency, method of delivery and duration, will be confirmed through the detailed LEMP, secured by Requirement 12 of the **Draft DCO [REP3-005]** and prepared substantially in accordance with the **Outline LEMP [REP3-100]**. This is appropriate because watering requirements will depend on the final planting specification, planting season, weather conditions and establishment success.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				In relation to soil compaction, the application commits to utilising best practice at the time the work is to be undertaken, i.e. DEFRA Construction Code of Practice for the Sustainable Use of Soils on Construction Sites in managing, and this will be secured through the **Outline Soil Resources Management Plan [REP3-098].** This will include measures such as the movement of vehicles and plant will be restricted to designated access and haul routes, no trafficking of vehicles/plant or materials storage will occur on reinstated soil wherever practicable and restricting vehicle movements during wet weather.
VJC-009	Arboriculture	Watering and Maintenance of New Planting	In the light of the recent week of hot weather, I am acutely aware that young plants die very quickly if not watered on a very regular basis and they require substantial amounts of water. If they did die, even if replaced, the planned mitigation and/or enhancements will not materialise.	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].**

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				The final watering regime, including frequency, method of delivery and duration, will be confirmed through the detailed LEMP, secured by Requirement 12 of the **Draft DCO [REP3-005]** and prepared substantially in accordance with the **Outline LEMP [REP3-100]**. This is appropriate because watering requirements will depend on the final planting specification, planting season, weather conditions and establishment success. Where water is delivered by bowser or tanker, those movements would be temporary and intermittent. They would be managed through the relevant construction, access and landscape management controls. They would not represent a continuous operational water demand.
VJC-010	Arboriculture	Watering and Maintenance of New Planting	I also asked the Applicant "How if the saplings and hedges die, as already seems to be anticipated in the OLEMP, the statements as to effects of this type of planting mitigation can be accepted?"	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**

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				LEMP [REP3-100], is secured through Requirement 7 in Schedule 2 of the **Draft DCO [REP3-005].** The final watering regime, including frequency, method of delivery and duration, will be confirmed through the detailed LEMP, secured by Requirement 12 of the **Draft DCO [REP3-005]** and prepared substantially in accordance with the **Outline LEMP [REP3-100]**. This is appropriate because watering requirements will depend on the final planting specification, planting season, weather conditions and establishment success. Under General Management Prescriptions, the **Outline LEMP [REP3-100]** sets out that: *"any plants and trees which are found to be dying, damaged or diseased following planting will be replaced with the same species and specification for Years 1-5 of the Scheme, as per the timetable in Annexe A. Thereafter, replacement planting will be required for any significant failures (i.e., extensive areas of plant or tree mortality leading to gaps, or mortality of a significant proportion of the overall number of plants or trees within a habitat feature), identified through monitoring, and the*

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				specification for replacement planting will be appropriate to the conditions on site, acknowledging the potential for conditions to change over the 60-year lifetime of the Scheme."
VJC-011	Arboriculture	Watering and Maintenance of New Planting	The Applicant's response was not satisfactory. It makes assumptions that all planting will grow at 0.4m pa in order to reach the heights anticipated at year 15. Although it appears to be accepted that not all saplings will grow at this speed as it is an average which the Applicant considers to be a reasonable approach rather than being site specific. It is not clear on what basis it has concluded this is a reasonable approach.	**ES Volume 1, Chapter 8 Landscape and Visual [REP3-025]** has assumed a uniform rate of growth is allowed for trees, shelterbelts, and woodland mitigation planting of 0.4m every 1 year. At Year 15 this will result in new trees, shelterbelts, and woodland plantings having reached a minimum height of 7.5m. A uniform growth rate is also allowed for new hedgerows of 0.4m every 1 year, resulting in hedgerows being able to be maintained at a height of 4.5m by Year 15. Existing hedgerows are to be allowed to grow out and will be managed to a height of 4.5m. Changes in management of existing hedgerows to allow for managed vertical growth would allow for existing hedgerows to reach a height of 4.5m sooner than proposed new hedgerow, however the Year 15 time period allows for both the proposed and existing to have reached the desired 4.5m.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				The **Outline LEMP [REP3-100]** prescribes that the shrubby element of hedgerows (excluding hedgerow trees) would be maintained to an optimum height of 4- 4.5m tall. This prescription applies to both new and existing hedgerows. The 0.4m per year growth rate has been calculated based on professional experience and through consultation with national nurseries such as Hilliers. The 0.4m growth rate has been provided to give a uniform worse case average across the 15-year establishment period, with expected growth rates considered in actuality to be greater. However, it is likely that growth rates could fluctuate year on year depending upon external factors such as climate and weather, and so the 0.4m growth rate is used to provide a uniform worse case average. The **Outline LEMP [REP3-100]** sets out the framework for the planting, management and monitoring of landscape mitigation. The **Outline LEMP [REP3-100]** is secured through Requirement 7 in Schedule 2 of the **Draft DCO [REP3-005].**

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
VJC-012	Arboriculture	Watering and Maintenance of New Planting	There are references to replacement planting which strongly suggests that the Applicant anticipates that many of its planned mitigation and enhancement planting will not survive. In those circumstances, how can the assurances about the effectiveness of the mitigation be accepted?	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].** The final watering regime, including frequency, method of delivery and duration, will be confirmed through the detailed LEMP, secured by Requirement 12 of the **Draft DCO [REP3-005]** and prepared substantially in accordance with the Outline Landscape and Ecology Management Plan [APP-283]. This is appropriate because watering requirements will depend on the final planting specification, planting season, weather conditions and establishment success. Under General Management Prescriptions, the **Outline LEMP [REP3-100]** sets out that: *"any plants and trees which are found to be dying, damaged or diseased following planting will be*

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				replaced with the same species and specification for Years 1-5 of the Scheme, as per the timetable in Annexe A. Thereafter, replacement planting will be required for any significant failures (i.e., extensive areas of plant or tree mortality leading to gaps, or mortality of a significant proportion of the overall number of plants or trees within a habitat feature), identified through monitoring, and the specification for replacement planting will be appropriate to the conditions on site, acknowledging the potential for conditions to change over the 60-year lifetime of the Scheme."
VJC-013	Operation and Maintenance	Cleaning of solar panels	The reference in the Applicant's answer to occasional panel washing is noted. Details of how often this is to occur and how this is to be achieved – and whether it would cause further compaction of the land – is not provided.	The Applicant notes the comment. Panel washing, if required, would be occasional and maintenance-led rather than a continuous operational activity. The frequency would depend on panel performance, soiling, weather conditions and manufacturer or operator requirements. Any water required for panel washing would be obtained from authorised supplies. It would not rely on uncontrolled abstraction from watercourses, ponds or groundwater.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Panel washing would be managed through the operational maintenance arrangements, including the detailed OEMP secured by Requirement 14 of the **Draft DCP [REP3-005]** and prepared substantially in accordance with the **Outline Operational Environmental Management Plan [REP3-094]**. Access for maintenance vehicles would use the operational access arrangements where practicable and would be managed to avoid unnecessary soil compaction, rutting or damage to drainage features. Where ground conditions are unsuitable, maintenance access would be deferred or managed using appropriate low-impact methods.
VJC-014	Operation and Maintenance		There is reference in the press recently that the panels at Cleve Hill (the largest solar NSIP currently built) are using huge amounts of water: [REDACTED]	The Applicant cannot comment on the operational water use of another solar project. That does not establish the likely water demand for the Scheme. For the Scheme, panel washing would be occasional and maintenance-led, if required. It would not represent a continuous operational water demand and would not rely on uncontrolled abstraction from watercourses, ponds or groundwater. Any water required would be obtained from authorised supplies and managed through the operational maintenance arrangements secured

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				by Requirement 14 of the **Draft DCO [REP3-005]**.
VJC-015	Operation and Maintenance	Cleaning of solar panels	Could the Applicant be asked to provide details of the panel cleaning regime, the source of water, the amount required and how this will be delivered to the various sites.	Panel washing, if required, would be occasional and maintenance-led. The frequency and method would depend on panel performance, soiling, weather conditions and manufacturer or operator requirements. Any water required would be obtained from authorised supplies. It would not rely on uncontrolled abstraction from watercourses, ponds or groundwater. The final panel cleaning arrangements would be managed through the operational maintenance regime, including the detailed OEMP secured by Requirement 14 of the **Draft DCO [REP3-005]** and prepared substantially in accordance with the **Outline Operational Environmental Management Plan [REP3-094]**. Access for cleaning vehicles would use the operational access arrangements where practicable and would be managed to avoid unnecessary soil compaction, rutting or damage to drainage features.