

Submission ID: SC9CECEC7

This combined document contains Stop Lime Down:
Post hearing submissions,
Comments on Deadline 3 Submissions, and
Comments on Responses to ExQ1.



LIME DOWN SOLAR PROJECT

DEADLINE 4 COMMENTS STOP LIME DOWN

July 2026





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1. Introduction

1.1.1. This document and the attached papers comprise Stop Lime Down's (**SLD('s)**) principal Deadline 4 submission. This document will address:

- Post hearing submissions
- Comments on responses to the ExA's first written questions ("**ExQ1**")
- Comments on any submissions received at deadline 3

1.1.2. In comments on responses to the ExQ1, SLD has taken a proportionate approach, providing comment in reply where there is something additional to make clear (whether by way of agreement or disagreement). SLD maintains its position as set out in the SLD WR and its Deadline 2 and 3 submissions, unless stated otherwise.

1.1.3. To update the ExA in respect of the SoCG between the Applicant and SLD, SLD provided a commented upon version of the draft SoCG on 8 June 2026. Meetings between the Applicant's and SLD's landscape, traffic, and glint and glare experts took place in the week commencing 22 June 2026. Currently the draft SoCG remains with the Applicant. SLD is seeking further meetings between its experts and the Applicant's. SLD welcomes engaging further with the Applicant.

1.1.4. This written submission uses the document reference for the tracked version of documents where multiple versions of the document exist in the Document Library.

1.1.5. In addition to this principal submission, SLD has also submitted a further version of its Appendix Z layered map. Included in this version of the map are layers related to equine matters. This information has been provided by another Interested Party to the Examination (Ms. January Farrington) and has been included to assist her in providing this information to the ExA.



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1.1.6. SLD welcome any questions that the ExA or any other party (including the Applicant) may have about this submission. SLD will continue to take steps to assist the ExA and advance its case throughout the remainder of the Examination.

1.1.7. This submission has not been produced with the use of AI.

2. Post hearing submissions

2.1. Open Floor Hearing 2

2.1.1. Mr. Daniel Kozelko, on behalf of SLD, made the following submissions at the Open Floor Hearing:

“SLD is a community group brought together by the concern that Lime Down is the wrong scheme in the wrong place. SLD is supportive of solar done right; it recognises the favourable policy in NPS EN-1, including in the Critical National Priority (“**CNP**”) infrastructure presumption. But that presumption, and therefore the Government, clearly recognises that some schemes will be designed in the wrong way or will be in the wrong place. That will be where the mitigation hierarchy is not applied appropriately (§4.2.14); that will be where there is an unacceptable risk to, for example, human health or flood risk (§4.2.15). Aside from that, the policy itself recognises some schemes should be rejected notwithstanding the presumption (§4.2.16). The presumption is, after all, a “starting point”, and there will be exceptional cases where the harms of a scheme clearly outweigh the benefits.

SLD, supported by its experts, say that is the case here. While the full case cannot be set out, it is hoped that some strands can be drawn together here to reflect how people will actually experience the scheme. We will do that by reference to something the Cotswolds is known for: its walks.

First, walking from Sherston to the Fosse Way along Sherston Walk 2, onto SHER/35 and then LUCK/57. We begin in the Cotswolds National Landscape (“**CNL**”), an area of the highest level of landscape protection. While the Applicant accepts some harm, SLD’s landscape expert says there will be significant adverse effects from running construction traffic through the CNL, and from building the solar farm in the CNL’s setting. Avoiding that traffic, a walker must choose to walk towards an energy generating landscape, along a PRoW enveloped by solar into what, historically, is a tranquil area which now



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faces audible electrical noise in the region of 50dB. Then, joining an ancient Roman Road connecting parts of the CNL; a key heritage asset the Applicant has underassessed the significance of and the effects on.

Second, walking from Hullavington to Corston along HULL/6, HULL/7 or HULL/8. Well-used routes are borne upon here by large numbers of HGVs with little space to pass. They walk along footpaths to Corston overlooked by a 132kV substation, with the Applicant accepting significant adverse visual effects on HULL/8 at all stages. They walk through a flood plain and Corston Brook which now far more regularly and excessively floods than it did before as a result of panel run-off.

Third, walking from Norton to Bradfield Manor along NORT/10 and HULL/1. Here we pass from a village surrounded on all major exit routes by solar and the noise of a 1GWh capacity BESS, along another footpath enveloped by solar which the Applicant itself accepts will experience significant adverse visual effects throughout the Scheme life. Solar infrastructure will be visible through fencing on what once was productive Best and Most Versatile agricultural land. The relationship between this agricultural landscape and Bradfield Wood is severed from the Manor itself, a Grade I listed building, the subject of the most significant planning protection and a dwelling, that the Applicant will just squeeze in under the SOAEL line instead of mitigating as far as it can in line with noise policy (and even then applying an artificially low background noise figure). The panels' glare on roads which the Applicant dismisses merely because of the number of road users that use them; not because of the actual safety risk posed by glare.

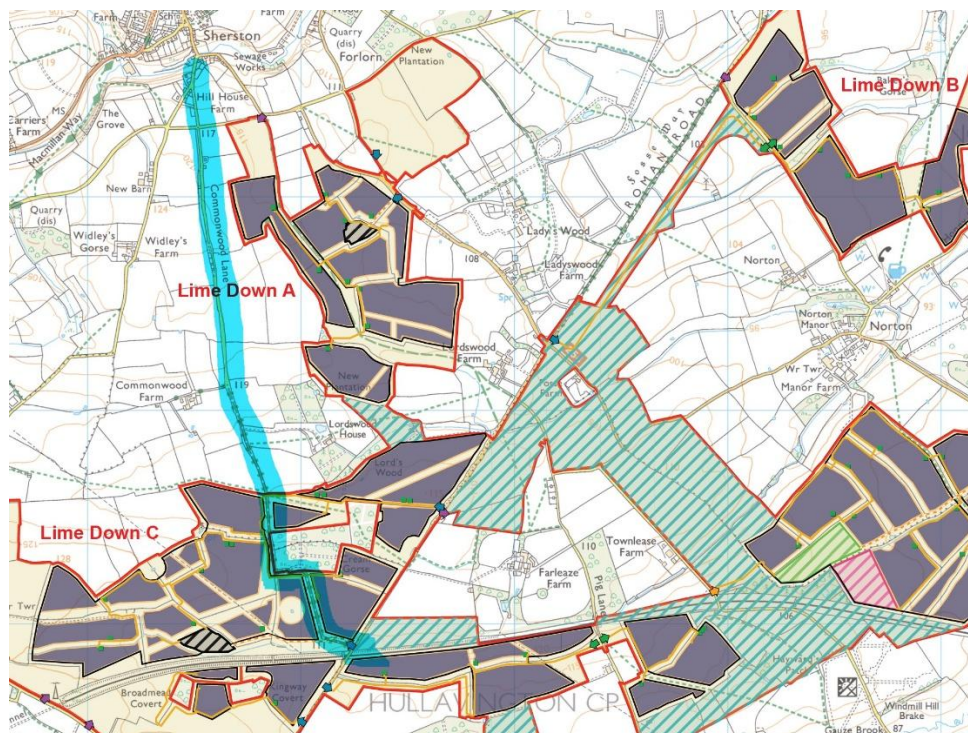
These three walks epitomise much of what you have already heard at these OFHs. The reality is, the Applicant hasn't avoided significant effects on assets of the highest protection; rather it has built what SLD understand to be the longest cable route at 22km to bring the Scheme into the heart of what is a sensitive location. Traffic and glint and glare effects are such that there is a real

risk to human health; flood is materially increased. And, ultimately, this scheme is exceptional in its harm to rural villages, heritage assets and landscapes of the highest value, and the setting for many peoples' homes. And that effects those who live here, but also those who visit and the income of businesses which depend on the landscape. All for a Scheme which the Applicant cannot even confirm will exist in full for 60 years and will not be commissioned or decommissioned piecemeal (with the loss of mitigation and energy generation that causes).

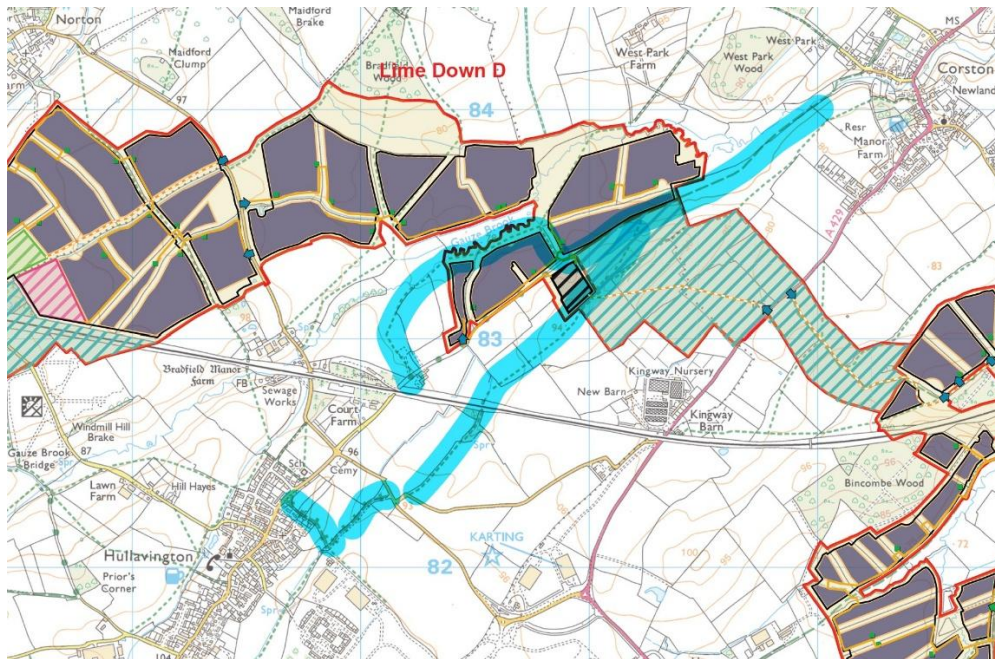
That is an exceptional case which calls for the use of the mechanism which Government has chosen to include in its policy. SLD consider that the recommendation to the Secretary of State should be to withhold consent."

2.1.2. Post-hearing submissions: the ExA requested that a map of the routes described in SLD's OFH submission be provided as Action Point 1 **[EV7-004]**:

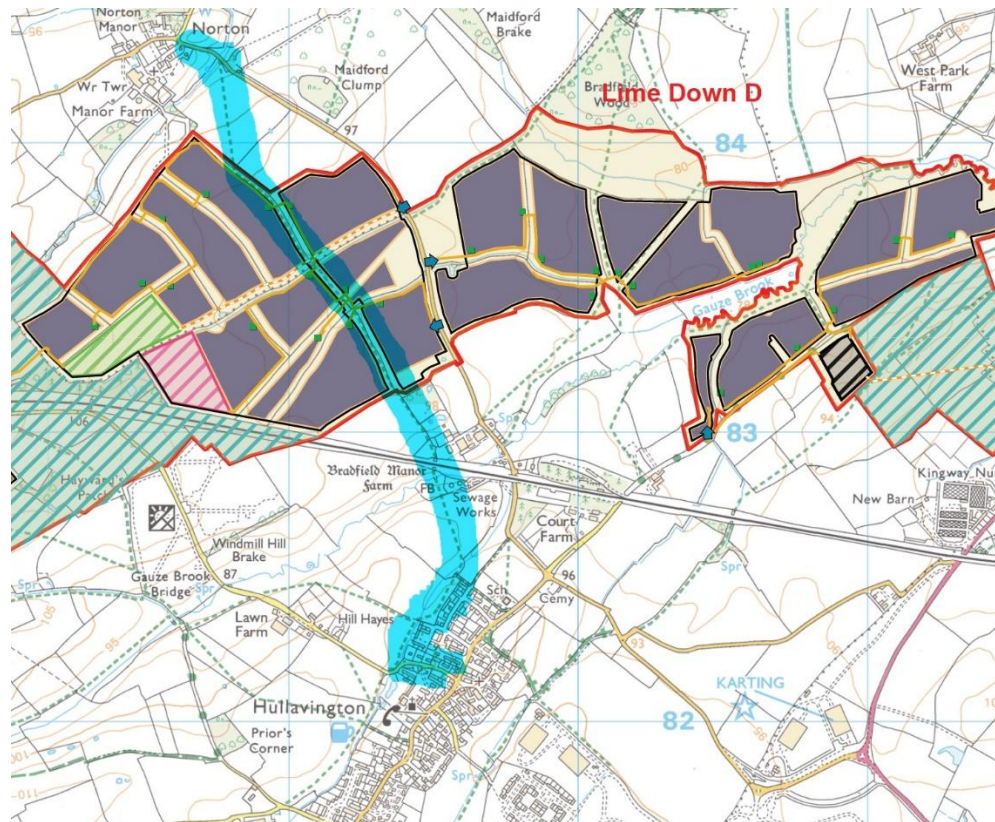
Sherston to the Fosse Way:



Hullavington to Corston:



Norton to Hullavington:





2.2. ISH2 – Landscape and Visual Impact

2.2.1. SLD attended ISH2 represented by Mr. Daniel Kozelko and Ms. Celia Reynolds. SLD's submissions were supported by its landscape expert, Ms. Carly Tinkler (author of Appendix B of SLD's WR [REP1-170]).

Landscape fabric

2.2.2. Under **Item 2**, Ms. Tinkler summarised the opinions set out in Appendix B of SLD's WR at [REP1-170] §§8.31-8.3.21.

2.2.3. Ms. Tinkler raised her concern that the Applicant's LVIA has double-counted mitigation measures as enhancement, which erroneously underpins the Applicant's conclusions that the benefits to fabric would further the purpose of the CNL designation.

2.2.4. The ExA raised §5.10.5 of NPS EN-1, and whether it aligned with the parties' approaches to landscape fabric. §5.10.5 states as follows:

"Virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape, but there may be beneficial landscape character impacts arising from mitigation."

2.2.5. Mr. Kozelko, on behalf of SLD, submitted that support for SLD's approach was found in GLVIA3, §3.39, which provides:

"Enhancement is not a formal requirement of the Regulations. It is often referred to incorrectly as an outcome of proposed mitigation measures – for example where planting is proposed to mitigate landscape and/or visual effects but will also achieve an enhancement of the baseline condition of the landscape. In practice enhancement is not specifically related to mitigation of adverse landscape and visual effects but means any proposals that seek to improve the landscape and/or visual amenity of the proposed development site and its wider setting beyond its baseline condition."

2.2.6. As Mr. Kozelko explained, under SLD's approach, mitigation measures such as screen planting which remain in situ post-decommissioning could result in

beneficial character impacts, so long as in themselves the measures do not give rise to adverse landscape / visual effects. This approach was one which read NPS EN-1 §5.10.5 and GLVIA3 §3.39 consistently together.

2.2.7. Additionally, support was also found in the Landscape Institute’s Technical Note on GLVIA 3 (published August 2024), at §4(4):

	“Issue/question	Advice/clarification
4(4)	Distinguishing between mitigation and enhancement	Care should also be taken to ensure that the terms ‘mitigation’ and ‘enhancement’ are correctly used. Mitigation is focused on measures to prevent, reduce and where possible offset any significant adverse effects while enhancement seeks to improve landscape and/or visual amenity beyond its baseline condition.”

2.2.8. In Ms. Tinkler’s opinion, interpreting §5.10.5, GLVIA3, and the Technical Note sensibly together, the Applicant cannot count the benefit of introducing additional landscape fabric in the character assessment and then also describe it as a benefit in fabric. GLVIA3 plainly distinguishes the difference between mitigation and enhancement, and their respective purposes, which cannot be conflated.

2.2.9. Ms. Tinkler further agreed with Wiltshire Council (“**the Council**”) that the Applicant is required to assess the “hard” and “soft” elements of landscape fabric. The Applicant has failed to fully consider the man-made elements of the scheme in its assessment of effects on and arising from landscape fabric. It was noted that the Applicant’s approach to “fabric” does not align with GLVIA3’s approach to “elements”, which are defined as (per the GLVIA 3 Glossary), “individual parts which make up the landscape, such as, for example, trees, hedges and buildings.”

2.2.10. Whilst the Applicant’s LVIA uses the term “fabric” instead of “elements”, it confirms that in the context of GLVIA3, here, the terms are used interchangeably, for example at §8.5.12, “Landscape Fabric being the individual

tangible elements or features of the landscape”, and §8.7.15, “Landscape Receptors, including the constituent elements of the landscape (the Landscape Fabric)”.

2.2.11. It is also relevant to note the difference between landscape “elements” and “features”, the latter defined in the GLVIA3 Glossary as “Particularly prominent or eye-catching elements in the landscape, such as tree clumps, church towers or wooded skylines or a particular aspect of the project proposal”.

2.2.12. As a consequence of the Applicant’s failure to assess man-made elements, its assessment of the overall “benefit” is skewed. Additionally, GLVIA3 requires the Applicant to consider the proportion of elements which would be lost and gained, then the degree to which aesthetic and perceptual elements of the character are altered. However, the Applicant has likewise failed to perceptually assess the individual components of the landscape.

2.2.13. Finally, it was noted that the Applicant’s LVIA “nods” (per the Applicant’s description) towards benefits to the legacy landscape in respect of the additions of landscape fabric. Ms. Tinkler and SLD agree with Wiltshire Council. Whether post-decommissioning impacts can be described as benefits depends upon whether the operational mitigation and enhancement ‘fabric’ planting measures are retained and, if retained, whether the operational hedge heights would be reduced to avoid the continuation of negative operational landscape/ visual impacts. Currently, none of these elements are secured or controlled under the draft DCO. Assessing the reasonable worst case, and where the proposed measures are correctly categorised as enhancement as opposed to mitigation, the benefits of new landscape fabric should be limited to the operational phase of the scheme.

2.2.14. **Post-hearing submissions:** The issue of double counting might helpfully be understood in the following (simplified) way. Where a fabric element is introduced (e.g. a hedgerow) it has an effect. If the element was introduced to

obscure views of a proposed development, the beneficial effect of that element is committed to that mitigation such that the overall effect to landscape character is zero sum (or as close to as the mitigation can provide). Where, as the Applicant does here, that fabric element is also separately assessed as having an effect which is of benefit to the site fabric, the effect is counted again as an enhancement. Thus, notwithstanding the beneficial effect of the fabric element is already accounted for in the assessment of landscape character, it is counted again (or double counted) for fabric. Whether or not the overlap between the effect as mitigation and the effect as enhancement of the fabric element is total, GLVIA3 requires the assessment essentially to 'pick a lane' so as to avoid substantial (if not total) double counting of the effect of that fabric element.

2.2.15. This also explains the approach to legacy landscape and Ms. Tinker's position that such a fabric element can in principle enhance at that stage (albeit, as has been explained elsewhere, it is considered that the Applicant is wrong to place any significant weight on post-decommissioning effects). By that point, the need for mitigation has entirely ceased. Thus, the effect is no longer needed for mitigation and can properly be described as having an enhancing effect. In that way, and as is described by NPS EN-1 para §5.10.5, what was mitigation has an enhancing effect. It should also be noted that that provision of the policy is directed to "landscape character", for which the Applicant accepts negative effects from the scheme.

2.2.16. As SLD understands it, it is this approach of the Applicant (splitting landscape fabric of the site out as a separate receptor from effect on the landscape character of the site, the latter of which the Applicant accepts experiences a Major Adverse (Significant) effect) which has been "developed" for the purposes of this exercise (using the words of the Technical Note on Landscape Fabric at **[REP1-121]** at §3.1.8). Ms. Tinkler considers that development to be a departure from the normal approach anticipated by GLVIA3 §3.39 and to not be appropriate.

2.2.17. During the hearing, Ms. Tinkler accepted that the solar arrays are not “hard” man-made “fabric” because even though attached, they “float” above the ground with grassland / other “soft” “fabric” underneath; however, where they obscure views of the grassland, they are perceived as hard “fabric”. Upon reflection, having considered the relevant parts of GLVIA3, Ms. Tinkler considers the Council’s conclusion that they are “hard” “fabric” better reflects the guidance.

2.2.18. Thus, Ms. Tinkler considers that the panels (and metal racking, frames, and foundations) are “hard” “fabric” / “elements” that would be introduced into the baseline environment, along with other “hard” elements such as substations, units, and access tracks, and “soft” elements such as grass, hedges and woodland. Note that also, in Ms. Tinkler’s opinion, whilst in themselves, panels are “elements” (as defined in the glossary to GLVIA3), the entire installation would become a new landscape “feature”, perceived as a distinct, prominent, and artificial characteristic at odds with the prevailing contextual landscape character.

2.2.19. This approach is also one which avoids the double counting issue identified above. In assessing the “hard” “fabric” comprising the scheme as part of the fabric assessment of the site, it would be properly recognised that “soft” “fabric” such as screening is mitigation (rather than it being mischaracterised as enhancement in respect of site fabric).

2.2.20. Also, Ms. Tinkler agrees with the Applicant’s opinion that the baseline situation in 60+ years is likely to be different from that of today therefore what is appropriate today may not be at that time. Therefore, what is appropriate should be established at that time through assessment.

The Cotswolds National Landscape

2.2.21. In respect of **Item 3**, SLD’s position on the setting of the CNL aligned with Wiltshire Council. Applying the CNL Board’s definition of the setting, it had to be construed as extending any impact arising from a specific development on the

national landscape, whether positive or negative. Accordingly, the first step is to consider the direct effect of any proposed development, then to consider the indirect effects, including the change in character associations when moving through the solar development to the CNL. The question then becomes the level of the effect and whether there could be an impact.

2.2.22. Ms. Tinkler proposed that it may be possible to reach some level of agreement in respect of the setting of the CNL by looking at zones of theoretical visibility plans from and towards the CNL. SLD notes that it is an Action Point for the Applicant to prepare additional ZTVs in respect of the CNL.

2.2.23. In respect of the layout of the scheme in relation to the CNL, SLD would welcome clarification in respect of whether the Applicant proposes to remove panels from the southern half of Field A1 (as apparently understood by the CNL Board). It is noted that this will be addressed as an Action Point arising out of ISH2.

2.2.24. SLD also notes Wiltshire Council's proposal that the Applicant remove all panels between the CNL and the Fosse Way. While SLD's primary position is that the Scheme should be refused, SLD agrees that panels in that location gives rise to major significant adverse effects and their removal would be welcome. However, in any event, the scheme would still give rise to major and major/moderate effects which would justify refusal. In respect of removals of panels in certain locations, SLD notes §5.10.26 of Policy EN-1.

2.2.25. In relation to the Secretary of State's duty to further the purpose of the national landscape (s. 85 Countryside and Rights of Way Act 2000), Mr. Kozelko underscored the relevance of how the s. 85 duty should have informed the Applicant's approach to site selection and alternatives.

2.2.26. **Post hearing note:** The ExA queried whether the parties considered the Secretary of State could comply with the s.85(A1) duty. Counsel for Wiltshire

Council referred to *New Forest NPA v Secretary of State for Housing Communities and Local Government* [2025] EWHC 726 (Admin). In that case, Mould J accepted that the scope of the “further the purpose” duty (which replaced the “have regard to duty”) “strengthened” the statutory protections (at §58). He went on to explain:

“61. As a matter of ordinary English, to “further” a stated purpose is to promote or to facilitate that purpose. Therefore, the duty imposed by section 11A(1A) of the 1949 Act upon a planning authority determining a planning application requires more than merely weighing the effect of the proposed development on the section 5(1) purposes in the overall balance. In order to discharge the strengthened duty, the planning authority must determine whether the proposed development is consistent with the promotion of the statutory purposes. If the planning authority determines that the proposed development is in conflict with the statutory purposes or would undermine the fulfilment of the section 5(1) purposes, they must the consider whether the grant of planning permission would be in accordance with their duty to seek to further those purposes.

62. The strengthened duty is expressed in qualified terms. The planning authority is required “to seek to further” the section 5(1) purposes. It is it not under a duty necessarily to fulfil those purposes. Nevertheless, in my view, in any case in which the planning authority determines that a planning application proposes development which is in conflict with the section 5(1) purposes or will undermine their fulfilment, the authority ought both to consider whether and to explain why they have decided that planning permission may justifiably be granted. The planning authority’s consideration of those matters will necessarily be informed by the circumstances of the given case, including the size and scale of the development under consideration and the extent and severity of its conflict with the section 5(1) purposes. These are matters of judgment, but a duty “to seek to further” the section 5(1) purposes necessarily invests the planning decision maker with the responsibility to judge, firstly, whether the planning application before them for decision proposes development which interferes with the fulfilment of those purposes; and if it does, whether and if so why the grant of planning permission is justified.

63. The planning authority may need to consider whether and if so, how the proposed development may be mitigated in order to address the identified conflict with the statutory purposes. They may need to consider whether any compensatory measures are available which might offset the identified conflict with the statutory purposes. They will need to consider the imposition of conditions or the need to obtain planning obligations to secure such measures.”

2.2.27. That case applied the equivalent of the s.85(A1) duty in the context of a National Park. The approach has been adopted in respect of National

Landscapes: *R (CPRE) v SSHCLG* [2025] EWHC 1781 (Admin); *Wadhurst PC v SSHCLG* [2025] EWHC 1735 (Admin).

2.2.28. SLD also notes the following paragraphs of the Secretary of State's Decision Letter for the North Falls Offshore Wind Farm Project (EN010119), referred to by the Applicant (emphasis added):

"4.124 The Secretary of State notes the general duty of public bodies to seek to further the purpose of conserving and enhancing the natural beauty of an area of outstanding natural beauty, in accordance with section 85(A1) of the CRoWA (as amended by section 245 of the Levelling Up and Regeneration Act 2023). The NPPF also promotes the duty to protect and enhance landscapes, and Local Plan policies reiterate this. The Secretary of State has also had regard to the DEFRA publication Guidance for relevant authorities on seeking to further the purposes of Protected Landscapes (2024). This advises that a relevant authority should take appropriate, reasonable, and proportionate steps to explore measures which further the statutory purposes of Protected Landscapes as far as reasonably practical and operationally feasible. NPS EN-1 paragraph 5.10.7 also states that the Secretary of State should be satisfied that measures which seek to further purposes of the designation are sufficient, appropriate and proportionate to the type and scale of the development. In considering this matter, the Secretary of State has also had regard to the representations made by IPs during and after the conclusion of the Examination. The Secretary of State agrees that the duty should be considered an active one and that, as worded, the duty is not restricted in its application only to effects deemed significant in EIA terms. The Secretary of State has carefully considered the evidence presented, including the Applicant's assessment, representations from IPs, the findings of the ExA, and the relevant statutory and policy framework. The Secretary of State agrees with the ExA that the duty does not require these purposes to be achieved but provides that the relevant authority must seek to further and enhance them. The Secretary of State also notes that the purpose of conserving and enhancing should be considered as disjunctive rather than conjunctive.

4.125 Due to the residual harms on the SECHNL, the Secretary of State agrees with the ExA that there should be consideration of how the Proposed Development would enable the decision maker to comply with the duty. The Secretary of State notes that a development of this scale, by its very nature, will struggle to conserve or enhance the special qualities of the SECHNL in terms of landscape and scenic qualities. The Secretary of State accepts that the Applicant has aimed to avoid, as far as possible, compromising the purposes of designation whilst having regard to various siting, layout, operational, and other relevant constraints. The Secretary of State has taken into consideration the design measures applied by the Applicant to mitigate seascape and visual effects, whilst maintaining the operability of the Proposed Development. These

have included the removal of the northern array which has increased the separation distance to the SECHNL, the reduction in blade tip height, and the reduction of the total number of turbines from 72 to 57. The Secretary of State has also taken into consideration that the Applicant's assessment assesses a worst-case scenario, which concludes that visibility of the Proposed Development from the SECHNL would be limited to the open coastal edge of the SECHNL and the Proposed Development would only be visible in excellent visibility conditions. When visible, the Proposed Development would be seen in the context of large-scale coastal views and that expansive areas of sea and sky would remain. Therefore, the intervisibility between the Proposed Development and the SECHNL would be limited.

4.126 Having regard to the nature of the Proposed Development and the absence of obligations under section 85(A1) of the CRoWA or NPS EN-1 to secure an improvement to the SECHNL or avoid any harm whatsoever, the Secretary of State considers that the Applicant has explored and applied appropriate, reasonable and proportionate measures to conserve the special qualities of the SECHNL in line with the DEFRA guidance and NPS EN-1 paragraph 5.10.7. The Secretary of State considers that the duty can be discharged on the basis of embedded mitigation measures. Actions taken to date on embedded mitigation would contribute to a continued conservation of the special qualities of the SECHNL, and in that way continue to be active in discharging the duty to seek to further the purpose of conserving the natural beauty of the special qualities of the SECHNL. Accordingly, the Secretary of State disagrees with the ExA and considers that the duty can be discharged without the need for further mitigation measures or enhancement in the form of compensatory financial contributions. Any such additional measures would be disproportionate as the Secretary of State considers that the duty to conserve and enhance does not require all adverse effects to be offset by enhancement measures."

2.2.29. Applying the two-stage approach in *New Forest NPA*, the Scheme is clearly in conflict with the statutory purpose of conserving and enhancing the natural beauty of the area. That is necessarily the case given the effects which Ms. Tinkler considers the scheme has on the CNL (which are significant indirect landscape effects). However, this position is also clear from the submissions of the CNL Board **[REP3-154]**, and even the Applicant itself which recognises the Moderate Adverse (significant) landscape effects in the 1km local study area which indirectly effects the CNL (**[CR1-035]** at §3.6.12).

2.2.30. In line with *New Forest NPA*, where such a conclusion is reached there must be consideration of whether consent would be in accordance with the duty to seek to further those purposes. On SLD's own evidence, it is clear that this is not the case because of the significant adverse effects that Ms. Tinkler considers are caused to the CNL (see Appendix B of SLD's WR **[REP1-170]** section 8.7). The same may also be derived from the conclusions of the CNL Board, including that it considers there to be Major/Moderate significant adverse effects from the scheme **[REP3-154]**. In such circumstances appropriate, reasonable, and proportionate measures have not been applied. As SLD has set out above, the setting of the CNL is significantly larger than the Applicant considers, and as a result there is a substantial amount of incongruous development within that setting which causes significant harm to the CNL. The construction traffic route is pathed through the CNL. The CNL Board's view of beneficial effects is that any are "negligible to minor".

2.2.31. SLD also repeat its point that compliance with the s.85 duty must be taken into account at the site selection stage. At the very least (given it appears in the Site Selection Assessment Report **[APP-185]**) the Applicant also appears to consider it relevant. SLD made submissions on this issue from §16 of Appendix L to SLD's WR (at **[REP1-186]**). In this regard the assessment of alternatives is an important issue, and SLD will comment further on the approach the Applicant has adopted (including in reply to any response received from the Applicant concerning Appendix 1 to SLD's Deadline 3 submission **[REP3-173]**).

Landscape character

2.2.32. Ms. Tinkler raised concerns in relation to the impact of the Scheme on the setting of the village of Norton. Mr. Kozelko noted (as set out in **[REP1-029]**), that the NORT/1 footpath runs through fields where solar infrastructure would be visible through the proposed security fence, which would affect how people experience Norton when they enter and exit it. Likewise, there is a similar effect on NORT/10 and HULL/1, where the Applicant accepts there would be a

significant adverse effect. Ms. Tinkler further agreed that any assessment of the setting of Norton should consider the impact on the minor roads (alongside the major roads) outside the scheme, as, due to being lightly-trafficked, they are used for informal recreation including as links between PRowWs. SLD differed from the Council to the extent that SLD does have particular concerns in respect of the effect on the road to the northeast of Norton, Honey Lane. Mr. Kozelko invited the ExA to take a view as to the relative height of the fields in relation to the road and whether the panels would be visible.

2.2.33. On cumulative effect, Mr. Kozelko agreed that there should be an assessment of the cumulative effect of the Scheme and those similar to it on the Hullavington Rolling Lowland North Wiltshire 2004 LCA. SLD would also welcome an assessment of the cumulative effect on the 2005 LCA 16A Malmesbury - Corsham Limestone Lowlands.

2.2.34. Mr. Kozelko further noted that, when considering the cumulative effect of “similar” development, development had to be scoped in which was not just a solar PV scheme, but also include BESS and electrical infrastructure, substations and road improvements. In Ms. Tinkler’s opinion, the assessment of cumulative effects should include any project that could markedly increase the levels of effects arising from the proposed development. All topics / receptors / effects should be considered e.g. ecology, heritage, water quality, noise etc (see for example GLVIA 3 at §7.7). A large-scale housing / commercial development under construction at the same time could result in higher levels of adverse effects on the road network (see, for example, GLVIA3 at §7.10). GLVIA3 at §7.15 explains that “cumulative effects deal with ‘other past, present or reasonably foreseeable actions’”.

Visual impact

2.2.35. Ms. Tinkler agreed that, given the Applicant could identify the likely amount of soil or material which would be produced by aspects of the

development, it was reasonable to expect the Applicant to be able to quantify the likely height of any soil stockpiles (notwithstanding a reasonable worst scenario height of 4.5m), the possible slope of any stockpiles and footprint. Such parameters were necessary to give an accurate visual impact assessment during the construction and operational phases of the scheme. Ms. Tinkler further cautioned that stock piling soil for such an extended period of the scheme would inevitably affect its quality and whether it could be reused again.

2.2.36. The ExA asked SLD to identify the two additional routes proposed for a sequential assessment in respect of SLD's response to ExAQ1, LV1.23 [**REP3-173**] on a marked-up map. The locations of the Order Limits, array areas, currently-identified cumulative sites and other relevant information can be found on the Combined Baseline and Project Information Plan v10.5 in Appendix Z of SLD's Written Representation [**REP1-188**] (and later iterations to be submitted). A further version of Appendix Z has been submitted at Deadline 4.

2.2.37. **Post-hearing submission:** further to ISH2 and Action Point 19 of [**EV8-010**], SLD provides the marked-up plan for minor routes below. The first route runs along the A429 between Chippenham (south) to Crudwell (north) (from Crudwell, the A429 continues north/north east to Cirencester). The A429 bisects Lime Down D and E.



2.2.38. The second route runs south-east to north-west between Chippenham and the CNL at Sherston (the latter being a village with good facilities including accommodation for visitors, especially walkers, so a popular destination).



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2.2.39. In respect of the possibility of the Applicant stockpiling soil at the solar PV Sites which was discussed during the ISH2, SLD liaised with its soils expert Mr. Sam Franklin. Mr. Franklin is sceptical that any kind of soil quality will be retained after such a long period of storage. The main evidence in support of such an approach being possible derives from sand and gravel quarries, where the topsoils are stripped, banded, and then replaced post-extraction. However, those soils are stockpiled over shorter periods (e.g. 5-20 years). It is noted that the issue of where and how long such stockpiling will occur for is not currently secured (see the Outline SRMP [REP3-099]). SLD consider that some outline parameters for location, length of storage, and approach to management should be provided now so that the ExA can consider the Applicant's approach. Mr. Franklin does, however, recognise that the Outline SRMP contains some positive provisions including the appointment of a suitable expert to consider restoration and soil handling.

2.2.40. Notwithstanding this, however, long-term storage of soil in bunds and mounds requires strict management to preserve the soil's structure, organic matter, and biological activity. Improperly stored soil can become compacted, waterlogged, or biologically dead. The goal is to prevent the soil from breaking down while it waits to be reused.

RVAA

2.2.41. Mr. Kozelko clarified that SLD accept that under the framework and parameters of the current guidance, Grain Store Barn is unlikely to require a "full" RVAA, having regard to the high threshold for such an RVAA to be required under the guidance. Given that it is not engaged for Grain Store Barn, it can be concluded that no "full" RVAA would be required in respect of any other properties.

Design and parameters

2.2.42. SLD repeated its suggestion for the Applicant to carry out an informal environmental colour assessment. Ms. Tinkler reiterated the importance of

identifying the right colour (hue and tone) to match the colour context. An informal assessment would involve surveying and recording the background colour, to establish which colours would help achieve visual integration. By way of example, Ms. Tinkler noted that a white BESS unit seen against a dark background would exacerbate landscape and visual harms due to the high level of colour contrast.

2.2.43. **Post-hearing submission:** This matter was discussed during the recent landscape SoCG meeting and the Applicant explained that whilst the proposed BESS units are white, the type of unit specified is not necessarily the preferred choice and other options could be selected which are available in other colours.

2.2.44. Clarification is sought as to whether the units could be coloured by other means if the manufacturer was unable to provide a unit of a sympathetic colour.

2.2.45. SLD would support the ExA's suggestion that the community liaison group be invited to engage with these design decisions.

2.3. ISH3 – Traffic and transport

2.3.1. SLD attended ISH3 represented by Mr. Daniel Kozelko and Ms. Celia Reynolds. SLD's submissions on traffic and transport were supported by its traffic and transport expert, Mr. Bruce Bamber (author of Appendix D to SLD's WR [REP1-172]).

Construction HGV and AIL Routes

2.3.2. **Item 2.1** asked the Applicant to explain the main construction routes to and from the solar PV sites, how they were chosen and which alternatives were discounted and why.

2.3.3. In response to the Applicant's comments that the construction routes proposed were the best available, Mr. Bamber clarified that he considered the routes to be "not the best routes but the least worst routes." Mr. Kozelko emphasised that this

was a product of the Applicant's flawed site selection process. The road network and the proximity to the CNL was an obvious planning constraint which could be clearly identified on a map, but was functionally ignored in the site selection process. A scheme could have been identified which would not have given rise to the same impacts on the CNL's tranquillity.

2.3.4. Mr. Bamber referred to Public Inquiries at Mitton (Appeal Decisions APP/H1840/W/22/3301732, APP/H1840/W/22/3301742) where impact on the CNL was an issue in relation to increases in traffic levels. The CNL Board identified the 10% threshold (ISEP Guidelines Rule 2) as the relevant threshold. Mr. Bamber stated that this supported the view that increases in traffic are relevant to the assessment of the level of impact on the tranquillity of the CNL. The applicant argued that the two developments are not comparable as this was a permanent development.

2.3.5. Mr. Bamber pointed out that the quoted consultation periods for transporting an AIL are not the same as the consultation periods for temporary traffic orders that would be required if sections of roads needed to be temporarily closed to general traffic (and parking suspended).

2.3.6. **Post-hearing submission:** SLD considers that the Applicant's attempt to distinguish the Mitton appeal is misguided. It is important to recognise that the assessment of the effects of the construction traffic is for the construction phase; within that phase such effects are not temporary or curtailed in length because they exist for the entirety of the phase. It is imperative that the effects of the scheme are assessed and understood properly vis-à-vis the phase in which they are assessed rather than being diminished by what subsequently occurs in a later phase.

2.3.7. SLD again notes the importance of the original selection of this site to this issue. SLD considers that this was a constraint which should and could have been taken into account (in line with the analysis at Appendix L of its WR **[REP1-186]** at §37.

As noted above, SLD awaits a further response from the Applicant given its Deadline 3 submissions, and will address this matter further in the Examination.

Construction Traffic – HGV Forecasting

2.3.8. **Item 2.2** asked the Applicant to explain the discrepancy in approach to trip calculation between SLD and the Applicant.

2.3.9. In response to the rebuttals of the Applicant's expert, Mr. Bamber defended the following aspects of his calculation:

2.3.9.1. **Solar Panels:** Mr. Bamber used an average of the number of HGV deliveries per hectare for five other solar farms with Works No. 1 areas between 292 and 1,157 ha (with an average at 784 ha; Lime Down's Works No.1 is 748 ha) and arrived at an average of 5.76 HGVs /ha (panels plus mounting structures). Lime Down is lower than all of these at 2.33 HGVs /ha. The Applicant has referred to the figures in §2.10.7 of NPS EN-3 (750-800 panels per acre/between 1,853 and 1,977 panels per ha). The Applicant identifies a panel area of 469 ha. This would lead to up to 927,138 panels or 55% more than currently assumed. This still would not explain the reason for the density of panels being so much lower than at other schemes (see Table 2 in Appendix D of SLD's WR **[REP1-172]**).

2.3.9.2. **Mounting Structures:** Mr. Bamber stated that if the number of panels increases, the number of deliveries associated with mounting structures increases. The Applicant has assumed no concrete footings despite these being required in areas with archaeological interest. The description of the scheme (see ES Chapter 3: The Scheme **[APP-055]**) identifies footings driven to a depth of between 1.5m and 4.0m. This will have a significant impact on the amount of material required. The Applicant has not made it clear what depth of footings has been assumed. The Applicant believed that Mr. Bamber had assumed that

some concrete footings would be used. Mr. Bamber corrected this statement to say that no concrete footings had been assumed in his calculations.

2.3.9.3. **Waste:** Mr. Bamber noted that conflicting information has been provided. It was clarified at the meeting that 10% of spoil would be removed from site using HGVs (not backfilled). This equates to around 700HGVs (1,400 HGV movements). This is included in the 2,685 HGVs allocated to “general”. The Applicant has suggested that spoil could be used for the BESS bund. On the basis of the Applicant’s drawings, Mr. Bamber calculated that this would accommodate around 12% of the spoil suggested to stay on site.

2.3.9.4. **BESS Containers:** The Applicant assumes 2 deliveries per BESS unit plus 16 deliveries for cabling ($270 \times 2 + 16 = 556$). Only 425 deliveries are allowed for. The Applicant states that the 50% uplift would allow 661 deliveries.

2.3.9.5. **Depth of BESS and Substation Foundations:** The Applicant assumes an average of 0.3m depth. The BESS foundations were originally identified (ES Chapter 3: The Scheme [APP-055]) as being up to 4.0m deep. [REP2-016] now states that foundations could be up to 12m deep. There will also be a requirement for volumes of gravel for fire water retention and concrete containment. Even if not all the area will be concrete foundations, the area that is not concrete is likely to be gravel with a thickness of 0.3m or more. Both the BESS and the substations will support very heavy components and there needs to be no risk of movement. The areas also need to be very stable to support the heavy equipment required to lift components into place.

2.3.9.6. **Electrical Components:** The Applicant makes no allowance for all the structural and electrical equipment associated with the BESS, 400kV substation and 132kV substations (see [REP1A-004]) apart from the BESS units and transformers. It is obvious from looking at the illustrative drawings of the 400kV substation (see [REP2-016]), for example, that the structures require significant amounts of components/structures/secure fencing. At §1.3.1 of ES Appendix 3-1 [REP3-041] the following components are identified:

- 400/132/33 kV power transformers and associated switchgear bays;
- Circuit breakers, disconnectors and earth switches;

- High-level and low-level busbars;
- 400 kV, 132 kV and 33 kV cable connection systems; and
- Current transformers, voltage transformers, earthing transformers and auxiliary apparatus as required.

2.3.9.7. **Access Tracks:** The Applicant is now suggesting that some of the access tracks will not be full construction. It is clear that the access tracks on the plans do not provide access to all parts of the site so it has been assumed that other tracks, not required to support large HGVs would be constructed to a lower standard. It is not reasonable to assume that the tracks identified are a worst case, and even if they were, that would be the basis for assessment. The Applicant stated that Mr. Bamber had assumed a construction depth of 0.5m. Mr. Bamber corrected this statement and explained that a depth of 0.3m had been assumed except in the case of those routes used by AIL vehicles.

2.3.9.8. **General:** The “general” category (2,685 HGVs) covers landscaping, spoil and compounds. Around 2,200 is allowed for construction compounds. Even with very conservative assumptions, this would not even allow for compounds. It also appears that no allowance has been made for compounds associated with the 400kV substation and the BESS.

2.3.9.9. **50% Buffer:** Mr. Bamber stated that the 50% uplift that has originally been used to reflect the fact that there are day to day variations in traffic flows is now being used to allow for areas where there may be under-estimates of HGV numbers. If this is the case a further allowance needs to be made to allow for day-to-day variations.

2.3.10. **Post-hearing note:** At the ExA's request in Action Point 6 [EV8-010], Mr. Bamber has provided an updated assessment of HGV trip generation for Deadline 4. That updated assessment is attached an Appendix A of this document.

2.3.11. It is important to recognise that the Applicant must assess on the basis of a reasonable worst case. Over the course of the Examination the Applicant has already modified its approach to assessment and increasingly relies upon the

50% buffer that it provided to account for its under assessment. As Mr. Bamber explains, however, that buffer also accounts for day-to-day variation which is lost as a result of this approach from the Applicant. The Applicant must assess a reasonable worst case (which is clearly different to that which the Applicant thinks is likely to happen); Mr. Bamber's assessments, which are clearly defensible for the reasons that he explains, take account of this reasonable worst case approach. That the Applicant thinks a smaller number of movements more likely does not make Mr. Bamber's approach unreasonable.

Construction Traffic – Light Vehicle and Shuttle Bus Forecasting

2.3.12. While **Item 2.3** was deferred to a future hearing, Mr. Bamber made a later point in the Hearing that there appears to be an under estimation of staff movements at Area D where the BESS and the 400kV substation would be built. There should be a concentration of workers in Area D, but Area C has more than Area D west. There is currently no proposal to limit car parking on the site. In fact, measures are proposed to ensure that all staff and contractors park on site suggesting that there must be sufficient parking to accommodate all possible demand. SLD would welcome this Agenda Item being explored further in the future.

Highway User Safety

2.3.13. Under **Item 2.4**, the ExA explored the robustness and validity of the Applicant's assumptions in respect of highway user safety.

2.3.14. In summary, Mr. Bamber's concerns in respect of the Applicant's approach were as follows:

- Plans are not clear enough to demonstrate that vehicles can pass.
- Forward visibilities do not demonstrate that all drivers are provided with an opportunity to pull in after passing a lay-by.



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- Plans are incorrect: lay-by dimensions are incorrect, in wrong place, and/or completely absent.

2.3.15. In response to a question from the ExA, Mr. Bamber explained that on a straight road a passing-bay spacing of 200m is sometimes used. This allows drivers to see both an oncoming vehicle and the availability of a passing-bay. Where the road has bends or other features that limit drivers' visibility, shorter distances are appropriate.

2.3.16. Mr, Bamber identified the key links where there were NMU safety concerns as:

- Alderton Road and the Fosse Way (cyclists and equestrians);
- The lane east of Hullavington/Bradfield Cottages (pedestrians, cyclists);
- The road between the Fosse Way and Sherston (cyclists, equestrians); and
- The lanes and public rights of way near Rodbourne (pedestrians, cyclists, equestrians).

2.3.17. SLD likewise consider it unlikely that HGV drivers will stop and wait to let pedestrians past when meeting points arise. SLD agree with the comment from the ExA that either the drivers will reduce the space between the pedestrian and the HGV or the verge will be overrun.

2.3.18. In relation to the Applicant's survey of non-motorised users, Mr. Kozelko pointed out that the survey in May 2026 took place in the middle of an extremely hot period when a yellow heat warning was in place (from UKHSA). It is also noted that the original 2024 survey was undertaken in January. Mr. Bamber noted that the Applicant had promised to undertake further NMU surveys. The ExA requested that all survey locations be repeated.

2.3.19. **Post hearing note:** Given the high heat over the bank holiday weekend and following week on which the NMU survey was conducted by the Applicant in

May 2026 (referred to at WCWR-038 of [REP3-129]), SLD considers this would have depressed NMU figures. At Appendix B an extract from the govt.uk website reporting the UKHSA heat health alert is provided, along with Accuweather records for the relevant month. It is also noted that the January 2024 figures are similarly likely to be depressed as they were conducted in the depths of winter and after the Christmas holidays.

Highway Improvement Areas

2.3.20. Under **Item 2.5**, the ExA sought an update from the Applicant in relation to the intended works for each of the HIAs.

2.3.21. The Applicant agreed to submit further plans providing detail of the constrained sections of the construction access routes. Mr. Bamber requested that sufficient detail be provided to allow judgements to be taken as to the available carriageway widths. Mr. Bamber requested that widths be measured on site but the Applicant did not suggest that this would be done and that widths would be clearly identified on topographical survey base.

Construction Traffic Management Plan

2.3.22. **Item 2.6** was deferred to a subsequent hearing, and SLD would welcome this Agenda Item being explored at a further hearing.

2.3.23. **Post-hearing submission:** Among other things, Mr. Bamber would have made a point that the holding areas identified by the Applicant do not appear feasible. Existing lay-bys close to the M4 are heavily used by the public and therefore not necessarily available for Lime Down vehicles. The HGV parking at Leigh Delamere Services is distant for the sites (20 miles for west bound HGVs accessing Areas A, B and C, 25 miles for westbound HGVs accessing Areas D and E) and therefore very difficult to use effectively.

2.4. ISH3 – Ecology and Biodiversity

2.4.1. At the afternoon session of ISH3, SLD was represented by Ms. Celia Reynolds and Mr. Daniel Kozelko. SLD's submissions on ecology were supported by its ecology expert, Mr. Nicholas Valori (author of Appendix E to SLD's WR [REP1-173]).

Survey Work

2.4.2. Under **Item 3.1** the ExA explored how the Applicant's Cable Route Corridor ("**CRC**") Order Limits were initially informed and how it was influenced by habitat survey work. The ExA queried the Applicant's approach to assuming presence of species and undertaking pre-commencement surveys of species at a later stage.

2.4.3. Ms. Reynolds raised a primary concern that by the time the Applicant gets to the species surveys it comes too late. Mr. Valori expanded upon this point, explaining his concern with the high-level approach. He noted that by deferring species specific surveys to a later date, the Applicant was placing the onus of effective avoidance and mitigation in the CRC onto the shoulders of the Ecological Clerk of Works ("**EcoCoW**"). Without species-specific information, the EcoCoW risks being overburdened and underequipped practically.

2.4.4. Mr. Valori observed that, even assuming there is presence, there are risks clashing with other practical concerns. In addition to seasonal timing restrictions, points were raised by the Applicant during the hearing concerning the impracticalities of extensive use of HDD for avoidance, citing costs, timing delays for identifying/setting up entry/exit points for cables and access limitations. These concerns raised by the Applicant are relevant because, if the EcoCoW has any concerns or needs more information, there is a strong incentive to not survey further or avoiding, given these concerns about delay and the length of the overall construction period.

2.4.5. Mr. Valori pointed out that assuming presence everywhere and a mitigation first approach leads to the paradoxical effect of over-relying on known information. This is because the focus at the pre-clearance check phase becomes the unknown information (to the detriment to any changes to the known information). Without a wider picture to inform things you are relying on the robustness of a single day survey, the reliability of such a finding will of course vary for a particular species depending on the time of day or season. This makes works adopting this approach, even when temporary, particularly susceptible to underestimating off-site and long-term consequences from proposed works.

2.4.6. In such circumstances the EcoCoW would then have to apply that limited survey to make a significant decision under significant time pressures, carried out with construction people on site, who are also under pressure to continue the works. There will be significant pressure on the EcoCoW to justify stopping, pausing or changing works, which in turn is more difficult to justify without having figures to support his conclusion.

2.4.7. **Post-hearing submissions:** By way of example, if at any point the EcoCoW notices that a pasture that must be crossed has changed since the original surveys (or was missed), and is uncertain whether it may now support breeding or wintering birds, a standard bird survey alone would require a three-four month commitment of at least four monthly visits (for wintering birds) or six visits across the breeding season. Current precautionary measures across the CRC account only for early morning pre-clearance visits, re-routing around existing nests or halting until these are fledged. In the case of wintering birds, mobilisation will be postponed by approximately one day to avoid impacts (see the Outline EPMS [REP1-106] at section 11.2).

2.4.8. In the case of dormice, reptiles or invertebrates, for example, there is not a baseline the EcoCoW can refer to at all to avoid impacts beyond a single hedgerow/field edge inspection shortly prior to clearance. Given the proposed

timescales and the scale/extent of works, Mr. Valori doubts the effectiveness of the Applicant's proposed avoidance/mitigation, which would effectively require the ecologist to make snap-decisions without robust species-specific data to refer and point to.

2.4.9. Mr. Valori considers the Applicant's rationale for not undertaking the omitted species-specific baseline surveys to be weak overall. With regard specifically to the issues raised during the hearing, and the Applicant's justification for its rationale in respect of various species, the reasoning for not carrying out surveys for white-clawed crayfish ("**WCC**") and hazel dormouse is especially concerning. Suitable habitat for these two species is present within the solar PV sites: the wet ditch within Lime Down D for WCC, and the wider network of woodland parcels, species-rich hedgerows in moderate to good condition and scrub within and directly adjacent to the boundaries across all major on-site parcels for dormouse. Both species will see some level of permanent habitat loss within the solar PV fields, due to the necessary access requirements. Habitat suitable for either species is also present within the CRC, and the Applicant has acknowledged the potential for disturbance during this aspect of the works as well.

2.4.10. Factoring the above with the scope of proposed works, there could still be adverse impacts on the species, if present, despite the mitigation put forward. If appropriate surveys were undertaken, the Applicant could conclude that further mitigation and compensation over and above that proposed may still be required, possibly including even securing a mitigation licence to permit some of the work depending on survey results.

Approach to Habitats

2.4.11. In respect of hedgerow, Ms. Reynolds asked whether there is any control for the ecological richness when taking out hedgerow, and whether there is a method statement provides for this. Ms. Reynolds further raised a concern about

the updated widths of roads. If as SLD argue some of these roads are too narrow, and the concern about width losses due to hedgerows and trees.

2.4.12. **Post-hearing submissions:** While it is noted that the Applicant considers it will take into account the ecological value of hedgerow when making siting decisions (as one of a number of factors), SLD consider that this may underweight the importance of this issue and would welcome further clarity on the parameters to be applied in the Outline EPMS **[REP3-103]**.

2.4.13. Further, Mr. Valori observes that, outside of extremely deteriorated hedgerows of negligible value, with limited baseline data it will be difficult to make an informed decision on the quality of the section of hedgerow/field boundary being affected. Presently, the Applicant proposes only to consult Wiltshire Council in respect of the *quantitative* loss of hedgerow, but they will have limited to no information in respect of the *qualitative* loss of hedgerow. This should be of significant concern, given the age and species richness of much of the hedgerow within the CRC (as well as the solar PV sites).

Approach to Species

2.4.14. The issue of species was deferred to the ExA's second written questions and/or second round of hearings.

Monitoring

2.4.15. Under **Item 3.4**, the ExA considered the Applicant's approach to monitoring during construction, operation, replacement, and decommissioning.

2.4.16. Ms. Reynolds referred to the OLEMP **[REP3-101]**, and the promise to "monitor bird populations across the Solar PV Sites both within the array and potential mitigation areas" which will then be "compared to baseline bird survey data collected for the Scheme." Ms. Reynolds question what would happen in the

event that population numbers do not bounce back to reflect what the Applicant has promised in respect of the scheme. Mr. Valori made the point that an enhancement to allow for retention of a greater number is different to management for quality, and effective monitoring would be essential. Ms. Reynolds argued that some commitment to adaptive management needed to be given. Ms. Reynolds emphasised that the Applicant was promising quite ambitious gains, notwithstanding they are removing habitats within fields where a lot of skylark are habituating, and promising to have higher levels of skylark over a much smaller area. Given this is aimed at avoiding what would otherwise be a significant adverse effect, SLD consider that measures must be clearly set out in the control documents so that they can properly be examined.

BNG

2.4.17. Ms. Reynolds confirmed that SLD did not have any additions above its other submissions on BNG.

Sheep Grazing

2.4.18. Ms. Reynolds confirmed that SLD did not have any additions above its other submissions on sheep grazing.

2.5. ISH4 – Draft DCO

2.5.1. At ISH4 SLD was represented by Mr. Daniel Kozelko and Ms. Celia Reynolds.

2.5.2. **Article 2 (definition of “maintain”):** Mr. Kozelko noted that SLD had not taken a point on the definition of “maintain” because SLD understood the scope of any such maintenance to be constrained by Article 5(3) of the draft DCO. However, SLD do see the merit of the constraint described by the Council, and Mr. Kozelko noted that SLD was somewhat sitting on the fence on this issue. Under Action

Point 1 and 2 the Applicant and Council will provide further written submissions on this issue, and SLD will consider those submissions.

2.5.3. Article 9 (Highway Authority Permit Scheme): Mr. Kozelko confirmed that SLD did not have any points to make on this provision.

2.5.4. Articles 10 and 15 (Power to Alter Streets and Agreements with Street Authorities): Mr. Kozelko confirmed that SLD did not have any points to make on these provisions.

2.5.5. Article 11 (Construction and Maintenance of Altered Streets): Mr. Kozelko confirmed that SLD did not have any points to make on this provision.

2.5.6. Article 14 (Access to Works): Mr. Kozelko confirmed that SLD did not have any points to make on this provision.

2.5.7. Article 16 (Traffic Regulation Measures): Mr. Kozelko raised two small points in relation to this Article. First, he suggested that a (c) be inserted into Article 16(5) to provide for written notices on site. He explained that this would be consistent with the recently granted Springwell Solar Farm DCO. This was to give further local awareness of the relevant measures. Second, while recognising it might be for the control documents, Mr. Kozelko raised a concern about how long it could be that measures could remain in place within the scope of the provision. He suggested that, where a specific measure is directed to a specific work of construction, maintenance, or decommissioning, the traffic measure should be constrained so they could not (for example) remain in place for the entire construction period. He explained that more detail on this issue should be provided, either in the DCO or in section 2.4 of the Outline Construction Traffic Management Plan. The Applicant confirmed that it would look at whether further detail could be put in the Outline CTMP. This was welcomed by SLD, and SLD will review any output provided.

2.5.8. **Article 41 (Felling or Lopping Trees Covered by TPOs):** Mr. Kozelko confirmed that SLD did not have any points to make on this provision. However, SLD will review the documents produced pursuant to Action Point 3 and 4.

2.5.9. **Schedule 2, req 5 (details to be approved):** Mr. Kozelko noted that SLD had raised similar concerns to the Council about this issue. Following the submissions of the Applicant and the Council, he suggested that the Explanatory Memorandum to the DCO might be updated to include information concerning which details were approved where in the Requirements to the DCO. He raised this because of the residual concern that the approach adopted by the Applicant did not reflect recently made DCOs (including Springwell Solar Farm, Fenwick Solar Farm, and the Helios Renewable Energy Project). SLD will review the mitigation plan that the Applicant is producing and will comment on this further if appropriate.

2.5.10. **Schedule 2, req 6 and 20 (substantially in accordance with):** Mr. Kozelko recognised that the wording in the draft DCO was used in a number of made DCOs. He noted that SLD would welcome matters generally being secured as strongly as possible, but that there was also a balance to strike to give the Applicant some flexibility. He noted that the Council was taking away Action Point 5 and was content for the dispute to be resolved between the Council and Applicant in that way.

2.5.11. **Schedule 2 (permitted preliminary works):** Mr. Kozelko highlighted that the reason SLD had raised this in its submissions was because of the difference in approach to the made Springwell Solar Farm DCO. He also noted that an approach which includes permitted preliminary works in the various requirements (as was done in Springwell) meant that the issue was reserved back to the local planning authority for discharge. However, he recognised a PPW plan may be effective and reserved SLD's position upon having sight of the plan, and whether there is sufficient detail in that plan.

- 2.5.12. **Schedule 2, req 6 (BSMP review):** Mr. Kozelko confirmed that SLD had no point to make on this issue given the Applicant was going to consider whether to add further text to the Outline Battery Safety Management Plan.
- 2.5.13. **Post-hearing submission:** SLD notes the comments of the ExA in respect of the non-response from Dorset and Wiltshire Fire and Rescue Service. SLD expresses the hope that the Service will provide a response to the ExA in respect of the questions it has already asked, and also in respect of any further questions which might be asked.
- 2.5.14. **Schedule 2, req 15 (revisions to the oCTMP):** Mr. Kozelko confirmed SLD had no points to make on this issue.
- 2.5.15. **Schedule 2, req 20 (decommissioning):** Mr. Kozelko aligned SLD's position with the Council. He noted the previous submissions that the Council and SLD had made about the lifetime of the Scheme and the effect of the commissioning and decommissioning provisions. In respect of requirement 20, he also raised the concern as regards what would happen if the Applicant (or the undertaker with the benefit of the DCO at the relevant time) was dissolved prior to decommissioning. He noted this raised a real issue about who to enforce against.
- 2.5.16. Mr. Kozelko also noted, in respect of the issue of the lifetime of the Scheme, that the current Requirement 2(2) did not provide for the Council to approve the written phasing scheme. Mr. Kozelko considered that some of the concerns as regards the life of the Scheme and the timing of decommissioning would be resolved by including a discharge provision in Requirement 2. He noted that such approval was provided for in the Springwell Solar Farm DCO as made. Mr. Kozelko noted this went to SLD's concern as regards piecemeal decommissioning.

2.5.17. Finally Mr. Kozelko noted that in the Helios Renewable Energy Project DCO a requirement that the applicant in that case give notice to the local planning authority that a bond for landowners was secured was included. He explained, however, that this still raised the concern about how you could ensure that the landowners did use that money for remediation.

2.5.18. Following the Applicant stating that it would look at the commissioning date provisions and how Works No.1 was controlled, Mr. Kozelko invited the Applicant to also look at the same for Works No.2 to 10.

2.5.19. **Post-hearing submission:** SLD's concerns about the commissioning and decommissioning timing of the Scheme are set out in more detail at §2.1.3 of SLD's Deadline 2 submission **[REP2-051]** and sections 16.2-16.3 of SLD's WR **[REP1-167]**. SLD considers that this issue must be looked at so that the ExA can be satisfied as to what is secured for the lifetime of the Scheme. SLD notes that Action Point 8 concerns the lifetime of the Scheme and SLD will review the submission provided at Deadline 4. SLD will also review the submissions that the Applicant produces as regards securing decommissioning in the context of the undertaker (e.g.) becoming insolvent to be provided at Deadline 4. SLD remains concerned about these issues, and the value and security of a bond or similar to manage the issue of decommissioning.

2.5.20. SLD disagrees with the suggestion that a requirement for approval of the phasing plan does not meet the test for a requirement. It clearly is needed to manage the environmental effects of the Scheme so that the ExA can be satisfied as to the approach to commissioning taken (which will be in control of the local planning authority). Given such approval was provided for in the Springwell Solar Farm DCO (and is also a common provision in planning permissions) it is considered that such a provision is appropriate and should be included.

2.5.21. **Schedule 16:** Mr. Kozelko made no submissions on these provisions, albeit SLD supports concerns of the Council as proper discharge of requirements would be critical to the local community if development consent were granted.

2.5.22. **Post-hearing submission:** pursuant to Action Point 10, SLD notes the following matters on the DCO (in addition to those already highlighted above) which SLD considers should be considered further:

2.5.22.1. **Article 2(1):** This concerns the definition of “laying apparatus” for the purposes of “permitted preliminary works”. This is because the word “apparatus” is also defined in Article 2(1) and SLD notes that it includes “electricity cables”. This was addressed on p.79 of SLD’s Deadline 3 submission **[REP3-173]** (at §SLD-420) and SLD makes the same point here and will review any response from the Applicant at Deadline 4. SLD notes that this issue may be resolved by the PPW plan that the Applicant proposes to produce, and will comment further upon this.

2.5.22.2. **Article 6(3):** this concerns constraints on the power to remove hedgerow outside of Article 40. While originally SLD considered a change should be made to Article 6(3), SLD has now suggested in its Deadline 3 submission **[REP3-173]** that “only” should be introduced to Article 40(4) after the word “remove”. As this was addressed at p.80 of SLD’s Deadline 3 submission **[REP3-173]** (at §SLD-421) SLD makes the same point here and will review any response from the Applicant at Deadline 4.

2.5.22.3. **Article 7:** this concerns the defence included in this provision related to statutory nuisance for noise. While SLD understands it is typically included in DCOs, given the Applicant states there shall be no statutory nuisance caused by the Scheme SLD considers that it should be removed. The Applicant at Deadline 2 said that it would provide further detail in the Explanatory Memorandum. This was not included at Deadline 3 and SLD invites further explanation of the reason why this provision should be included at the next deadline.

- 2.5.22.4. **Article 17:** this concerns whether s.106 of the Water Industry Act 1991 should be excluded under this provision. SLD consider that s.106 should be excluded. This was addressed on p.80 of SLD's Deadline 3 submission **[REP3-173]** (at §SLD-423) and SLD makes the same point here and will review any response from the Applicant at Deadline 4.
- 2.5.22.5. **Article 47(4):** this concerns whether the time limit under this Article should be the same as that provided for in Schedule 16 of the DCO. At Deadline 3 SLD noted that some more time had been given under this provision, but that the Council's request had gone further. SLD remain of the view that this request should be acceded to.
- 2.5.22.6. **Schedule 2, req 4(3):** this concerns the suggestion that the liaison group should run for 5 years into operation. This was addressed on p.81 of SLD's Deadline 3 submission **[REP3-173]** (at §SLD-426) and SLD makes the same point here and will review any response from the Applicant.
- 2.5.22.7. **Schedule 14, art 8(2):** this concerns the confidentiality provision included in this requirement. SLD consider that, as a starting point, there should not be such a confidentiality provision. This was addressed on p.82 of SLD's Deadline 3 submission **[REP3-173]** (at §SLD-430) and SLD makes the same point here and will review any response from the Applicant at Deadline 4.
- 2.5.23. It is also noted that the Council has made a list of further suggestions, on which SLD commented in its Deadline 2 submission **[REP2-051]** in section 3.3. SLD would welcome those suggestions being considered further.

3. Comments on Deadline 3 Submissions

3.1. Landscape

Wiltshire Council Comments on Other Submissions at Deadline 2 [REP3-141]

3.1.1. Under the heading Point 4: The Benefits of Mitigation, at §4.23 the Council states, and SLD's landscape expert agrees, 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".

3.1.2. Para. 4.24 goes on to say 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."

3.1.3. However, LVIA Table 8-18 indicates that these measures are mitigation, not enhancement, and care should be taken to distinguish between the two.

CNL Board Comments on Other Submissions [REP3-154]

3.1.4. Among other things, SLD's landscape expert agrees with the CNL Board's comments and concerns under PMIE 4, about tranquillity, the Scheme's effects upon it, and the Applicant's approach to assessing the effects.

3.1.5. Appendix B to SLD's WR at [REP1-170] deals with this matter at §§6.2.6 – 6.2.18.

3.1.6. Ms. Tinkler notes that aspects of tranquillity include a sense of security, and feeling safe, which is very relevant to consideration of the effects of construction traffic using quiet lanes through the CNL which are regularly used for informal recreation.

3.2. Traffic and Transport

3.2.1. The Applicant submitted an updated Transport Assessment at Deadline 3 [REP3-066]. SLD notes that Table 13-12 has been amended to include a 50% uplift in total HGV movements. As discussed further below, previously the 50% uplift was applied to the daily HGV movements to represent day-to-day variation. Further, §1.5.12 asserts that a 50% uplift is being applied to reflect a peak day – however (again as discussed further below), the Applicant relies upon the 50% uplift as representing a variety of assumptions.

Applicant's Response to SLD WR – Appendix D Transport Report [REP3-133]

3.2.2. The below comments are also informed by a meeting that took place between the Applicant's expert and Mr. Bamber on 23 June 2026.

Para	Response
2.1.3: Weight of Mounting Structures	The Applicant clarifies that the figures within the analysis were derived from a detailed breakdown of construction activities provided by a contractor based on the draft layouts designs provided by the Applicant. However, Mr. Bamber's concern is that allowing 18kg per solar panel does not allow for concrete footings. No justification has been provided for this approach. The Applicant is relying on estimates provided by a potential contractor based on preliminary drawings.

2.1.7: Calculation of Numbers of Solar Panels:	The Applicant states that there will be 469 ha (1,159 acres) of panels although the source of this figure is not made clear. Para. 2.10.17 of NPS EN-3 states that 2-4 acres of solar farm are required for each MW of output and a typical 50MW solar farm will consist of 100,000 to 150,000 panels covering between 125 and 200 acres. This equates to between 750 and 800 panels per acre or between 1,853 and 1,977 panels per ha. An area of 469 ha would contain 927,138 panels on the basis of 800 panels per acre. The Applicant is assuming 600,000 modules. The Applicant therefore bases its calculations of transport movements on only 65% of the number of modules that would be calculated using the figures in EN-3.
2.1.8 Meaning of 50% buffer:	Reference is made in the Applicant's response to the 50% buffer allowance in relation to solar panels, mounting structures, BESS containers, access track aggregate, construction machinery and equipment, removal of spoil and the CTMP as a whole. Para. 1.5.4 of the TA makes it quite clear that the 50% uplift is not to allow for increased numbers of trips but to allow for day-to-day variation in trips: "it is acknowledged that there will be small peaks throughout the construction phase, especially during preparation of the Order Limits. To account for this, a 50% uplift has been applied for the purposes of assessment". The Applicant is now saying that the 50% uplift covers under-estimates of predicted trip generation. This would mean that what was originally a "worst case" day, is now the average day. The implication is that the worst case day would

	therefore require a further 50% uplift. At the meeting between experts the Applicant's transport expert did not make it clear whether or not there had been a change in the approach to the buffer but referred to aspects of the calculations where a worst case had been adopted (cable route and solar PV areas constructed simultaneously, over-estimate of density of aggregate).
2.1.12 BESS Containers:	It is stated that each BESS could be transported as two parts, each on a standard articulated vehicle. It is stated that a reasonable worst case of 425 containers has been assumed. A total of 270 BESS units would generate 540 deliveries plus 16 HGVs for cabling – 556 HGVs in total. The Applicant has not assessed a worst case and relies on the 50% uplift.
2.1.14 Depth of BESS and Substation Foundations:	The point is made that not all of the area will require foundations so 0.3m is a reasonable average. It is stated that the BESS is subject to detailed design. This introduces uncertainty into the assessment and requires a reasonable worst case that could require far more aggregate because of the need for fire water retention. The latest ES Appendix 3-1 states that foundations could be up to 12m deep (§1.2.11). Equally, applying the “reasonable average” is a failure to apply the reasonable worst case. The Applicant ought to have based calculations of depth on the worst-case scenario.
2.1.16: Allowance for electrical components:	The Applicant suggests that the only components in the BESS and substations are BESS units and transformers. This does not reflect the extent and complexity of the

	substation structure. Para. 1.3.1 of Appendix 3-1 [REP3-041] identifies the following components: • 400/132/33 kV power transformers and switchgear bays; • Circuit breakers, disconnectors and earth switches; • High-level and low-level busbars; • 400 kV, 132 kV and 33 kV cable connection systems; and • Current transformers, voltage transformers, earthing transformers and auxiliary apparatus.
2.1.18 Allowance for Conversion Units:	This is also assumed to be within the “buffer” of 50%. The same comments in respect of this above apply here.
2.1.19 Transport of Machinery and Equipment	The Applicant’s response states that “no specific allowance has been made for the delivery or movement of construction machinery and equipment, as these activities are already captured within the conservative assumptions applied to HGV activity” and that an allowance for the transport of machinery and equipment also falls within the 50% “uplift.” Again, this confirms that no allowance made and, in Mr. Bamber’s view, the Applicant has failed to assess the reasonable worst-case scenario.
2.1.20 Construction and Removal of Compounds:	An indicative 50m x 50m compound layout is provided. Mr. Bamber has concerns that this would not work because minibuses could not get into and out of spaces, the car park has insufficient aisle width to allow cars to manoeuvre, there is no area for equipment and machinery (only delivery

	storage area), generator, skips/waste containers, fuel storage, wheel washing or a compactor.
2.1.22 Spoil:	The Applicant suggests that all spoil will remain within the site, but also that traffic movements on account of spoil will be assessed within the 50% uplift. At the meeting it was stated that the assumption was that 10% of the 139,666m³ of excavated soil would be removed and that there would be no backfilling of aggregate vehicles. This, by itself, would require around 700 HGVs (1,400 HGV movements).
2.1.24 Off-site Highway Works:	It is stated that off-site highway works would be completed before the construction period. This suggests that there has been no assessment of the potential impact of these works within the Applicant's transport assessment, notwithstanding those being a clear effect of the Scheme.
2.1.28 HGV Types:	Reference is made to the HGV movements associated with the Network Rail site and it is suggested that HGVs have used the Fosse Way "without issue". It is not known whether this has been the case. Those works are associated with a single compound.
2.1.30 400kV Substation Construction Period:	It is stated that the 6-month construction timetable is adopted as a "worst case" for the construction of this substation. This is not the case because, if the period were longer, it would lead to cumulative impacts with Lime Down E. A simple internet search elicits the response "2.5-3.5 years" for the construction of such a substation. At the meeting the

	transport expert conceded that the timescale for the 400kV substation construction would likely be similar to the BESS, around 2 years. This means that the 400kV substation will be constructed concurrently with Lime Down D and E and the BESS.
2.1.34 Chances of HGVs meeting on Fosse Way:	It is suggested that there would be a 1 in 8 chance of HGVs meeting on the 3.1km section of road between Grittleton and the access to Lime Down C. A vehicle travelling at 25mph (40kph) takes 4.65 minutes to travel 3.1km. If there are 5 HGVs travelling south and 6 HGVs travelling south there would be, on average 2.3HGVs meeting every hour. It was agreed at the meeting that calculations would be exchanged with a view to agreeing the level of interaction. Following discussions between the transport experts, it was agreed that a figure of 2.3 HGVs meeting per hour is correct.
2.1.35 Chances of HGVs meeting on Road to Bradfield Cottages:	It is suggested that there would be a 1 in 26 chance of HGVs meeting on the 0.98km section of road between The Street, Hullavington to Lime Down D. A vehicle travelling at 25mph (40kph) takes 1.47 minutes to travel 0.98km. If there are 3 new HGVs and 7 existing HGVs travelling in the opposite direction, there will be one HGV every 6 minutes. There would be, on average, 1.7HGVs meeting every hour. The length of constrained road is more than 0.98km since it extends around the bends to the south of The Street. It was agreed at the meeting that calculations would be exchanged with a view to agreeing the level of interaction. Following discussions between the transport experts, it was agreed that the figure of 1.7 HGVs meeting per hour is correct.

2.1.37 Access to Area E south of Railway:	It is stated that all transport of materials and equipment to areas south of the railway would be by tractor and trailer. It is not clear how items such as compound construction, the delivery of large machinery etc, could be achieved in this way. It would also mean that the number of vehicle movements would be greatly increased, thus increasing the impacts on users of the lanes and rights of way.
2.1.39 Traffic Management and Monitoring System (“TMMS”):	It is stated that a TMMS will be “considered” for implementation as part of the final CTMPs. If the TMMS is considered to be essential to mitigate the adverse impacts of construction traffic, the Applicant should commit to delivering an effective TMMS.
2.1.44 Forward Visibility along Road East of Hullavington:	Reference is made to Drawing 51A. The intervisibility distances do not demonstrate that HGVs will not meet on narrow sections. At the meeting it was requested that the Applicant forward separate files showing swept paths of vehicles on the narrow sections of road. The latest drawings cannot be interrogated because the file crashes and the topographical survey lines are too thick to allow relative locations to be judged with confidence. A further site visit has been undertaken to measure road widths and intervisibilities where the applicant suggests that HGVs can safely pass. This confirms that the current plans do not provide sufficient confidence that construction vehicles can safely use the proposed routes.

2.1.45 Accident Blackspots:	SLD identifies two locations yet only one is discussed in the Applicant's response. The cluster of accidents at the junction of Sheldon Corner with the A420 is not discussed.
2.1.46 School Acton Turville:	The Applicant excludes the school since the route does not pass it directly. There will, however, be children crossing the construction route to and from the school. A site visit confirmed that school pupils do cross the B4039 in Acton Turville. An elderly resident was also observed crossing in both directions.
2.1.48 Burton:	It is stated that the B4039 is already well used by HGVs. This fails to recognise the fact that against this relatively high baseline, the proposed development will lead to at least a 100% increase in daily HGVs
3.2.2 Road Width and Sensitivity:	The Applicant states that road width is not considered in receptor sensitivity. Paragraph 2.7 of the ISEP Guidelines states: “2.7 The perception, experience and health effects of changes in traffic by humans, and the impact of traffic changes on various ecological systems will also vary according to such factors as: • Existing traffic levels • The location of traffic movements • The time of day • Temporal and seasonal variation on traffic • Design and layout of the road and pavement • crossing points • Landscape/townscape character. Designated status, land use and activities adjacent to the route • Ambient conditions of adjacent land uses.”

	This confirms the obvious point that the sensitivity of vulnerable road users does depend upon the characteristics of the road or footway. At the meeting the Applicant's transport expert stated that road width was allowed for in the magnitude of impact. Mr. Bamber does not agree with this approach. Where changes in the magnitude of flows (either total flows or HGV flows) exceed the thresholds set out in the ISEP Guidance (Rules 1 and 2) it is necessary to consider the impact on sensitive receptors and the sensitivity of those receptors to changes in flows will depend, to some extent, on the nature of the road environment.
3.2.5 Sensitivity of B Roads:	The Applicant states that B roads are classified as having low sensitivity except in the CNL or through residential areas. Both Acton Turville and Burton are residential areas and both are sensitive to changes in traffic flows (vulnerable highway users, narrow or absent footways, lack of pedestrian crossings) yet these areas have not been avoided.
3.2.6 Vulnerable Users:	The Applicant confirms that the assessments have been undertaken on the basis that "there was not a large concentration of vulnerable users on the construction access routes." SLD has produced evidence in respect of vulnerable road users, and Mr. Bamber has observed such road users when on site visits. Mr. Bamber has concerns that this substantially underplays the presence of such users. The Applicant's

	surveys of vulnerable highway users have been undertaken at non-representative times and, following discussions at ISH3, the Applicant proposes to repeat the surveys over the summer.
3.2.10 Severance:	The Applicant quotes the definition of severance in the ISEP Guidelines (at §3.13): “the perceived division that can occur within a community when it becomes separated by major transport infrastructure” that “separate people from places and other people”. The Applicant goes on to state that severance is to do with gaps between vehicles and is not, therefore affected by HGVs. The Applicant has overlooked the clear requirement to consider the “perceived division that can occur”. The Applicant has therefore failed to undertake an acceptable assessment.
3.2.15 NMU Amenity/ Fear and Intimidation:	The Applicant dismisses this on the basis that there are “low numbers of NMU movements”. At the meeting Mr. Bamber requested the raw data from the recent NMU surveys. The transport expert stated that the recent surveys confirmed the findings of the January 2024 surveys. SLD has set out its concerns in respect of the NMU surveys in its post-hearing submissions for ISH3 above. The Applicant agreed at ISH3 to retake these surveys.
3.3.4 Highway Code	The Applicant presents an interpretation of the safe passing widths for NMU/HGVs. The Applicant adopts the same dimensions as adopted by Mr. Bamber but omits to allow any clearance between the off-side edge of the HGV and the side

	of the road. This is not safe. If the HGV allow any clearance the minimum safe margins around the NMU are reduced.
3.4.1 PRoW Measures:	The Applicant's reference does not correspond to the content of SLD's Transport Report (at Appendix D of SLD's WR [REP1-172]).
3.5.2 HGV Trip Numbers:	It is stated that "trip numbers are subject to change". This calls into question whether a reasonable worst case has been assessed.
3.5.3 Cumulative Impact:	It is stated that the calculation of construction vehicle numbers assumes that all solar PV sites and the cable route corridor are constructed concurrently. This is not correct since the cable route trips are not accounted for on the routes where they combine with PV traffic. The Applicant will provide details to explain how the cumulative impact has been assessed.
Table 3-1 HGV Trip Calculations:	It is stated that a compactor will be provided on site. The latest Outline CEMP ([REP3-093], p.67) states that waste compactors will be located within each solar PV site. It is stated that some compound material will be retained on site for maintenance access tracks. No access tracks are identified connecting the maintenance access points with the solar array areas. If tracks are to be laid, they should be included as elements of the site. The "general" category includes compounds, waste, spoil, fencing and landscaping. It appears to be a "catch-all" for anything that has been overlooked. It is stated that spoil will only be removed from site if it is contaminated. This has not been suggested before and does not appear to be consistent with other statements about the possibility of spoil being removed from site.

3.6.2 NMU Surveys:	It is stated that the Applicant has undertaken its own surveys of NMU on Alderton Road, Fosse Way, unnamed road opposite The Street and Rodbourne. See comments above.

Outline Construction Traffic Management Plan [REP3-109]

3.2.3. At Deadline 3, the Applicant submitted an updated outline construction traffic management plan [REP3-109].

3.2.4. Para. 2.2.10 states that all solar PV accesses will be retained in their altered state/size. This may lead to difficulties as the site accesses generally comprise wide areas of hard surfacing that will be treated as informal lay-bys, encouraging drivers to pull into places that may not be appropriate for parking.

3.2.5. Para. 3.2.7 states that deliveries to and from access points 123 to 127 (Gastard to Melksham substation) will avoid school start and finish times. This appears to be to avoid impacting on the Shaw Primary School that is located on the eastern side of the A365 south of Whitley. Para. 3.4.3 states that workers will also be advised not to travel past the school at start and finish times. The Applicant has not, however, sought to avoid routeing HGVs through Acton Turville at school finishing times.

3.2.6. In respect of HGV management, §4.7.2 states that incoming vehicles would contact the site manager when approaching the site and departing HGVs would be held back. This would mean that HGVs would need to be held back from all compounds that were operational at the time. This significantly increases the logistical difficulties in implementing an effective HGV management system.

3.2.7. In respect of HGV holding locations, figure 4.3 now shows possible holding locations on construction routes. These include two lay-bys on the B4044/B4039

route. These are relatively small lay-bys. If one other vehicle is in the lay-by the HGV would not be able to stop. This is likely to lead to HGVs pulling into inappropriate places. Two lay-bys are identified on the A429 just north of the M4 Junction 17. These are larger but would also become inaccessible if a small number of other vehicles were using the lay-bys. There are 13 Google Maps image of the northbound lay-by and every image shows the lay-by being used by at least 1 vehicle and often many more. There are 14 Google Maps images of the southbound lay-by and all show more than 1 vehicle parked in the lay-by. Leigh Delamere services is identified. This would not be viable for many journeys. An HGV travelling west on the M4 would be 20 miles from Areas A, B and C, and 25 miles from Areas D and E. The holding locations would not guarantee that HGVs could successfully and safely stop. At the meeting the Applicant's transport expert stated that the main location to hold HGVs would be the M4 services, which raises the concerns set out above.

Applicant's Response to Comments Received at Deadline 2 [REP3-129]

Para	Response
WCD1-087 Depth of BESS and Substation Access Tracks	The depth will vary between 0.35 and 0.65m depending on soil conditions. A depth of 0.5m has been used as a "reasonable assumption". It is not, however, a likely worst case assumption
WCWR-038 Impact on Vulnerable Road Users	The TRICS database and National Travel Survey have been used to estimate the number of walk trips on Bradfield Cottages (17 per day). Although this methodology identifies the likelihood that there would be walking trips, no judgement is made as to the impact of construction vehicles on them. It is suggested that surveys of cyclists on Bradfield Cottages in January 2024 included bank holiday peaks. This appears

	mistaken (unless it included the New Year Bank Holiday), and is also in the depths of winter.
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3.3. Ecology and Biodiversity

Outline Ecological Protection and Mitigation Strategy [REP3-103]

3.3.1. A recurring question from the ExA during the hearing, raised when referring to the lack of species-specific surveys within the CRC in favour of a mitigation-based approach with input from general habitat condition and desk-based data, was: (outside of encountering EPS species) where works cannot proceed without securing a licence beforehand, what are the risks and issues with proceeding under this EcoCoW-led mitigation basis?

3.3.2. Two important considerations arise: practical limitations in being able to effectively identify and address sources of impact (and, therefore adjust the mitigation measures accordingly even when carrying these out within individual 'microsites'), and limitations, oversights or inadequacies with the current schedule of mitigation measures of this approach.

3.3.3. **Limitations identifying sources of ecological impact:** As already raised during the hearing, the most obvious limitation of a pre-clearance lead approach is the relatively short amount of time afforded to data gathering, often limited to a single site inspection shortly prior to construction works commencing. This approach is susceptible to changes in seasonal behaviour for different species being monitored, as well as effects of weather conditions.

3.3.4. Weather in particular can have a significant impact on the effectiveness of individual searches. Rainfall, even within the days directly preceding the inspection, can wash away critical identification features such as tracks, feeding remains and droppings. Temperatures and sunlight will instead dictate the times

of day where reptile basking behaviour, concealment or torpor will be at their highest. A mitigation decision (such as trench route selection, in the case of the proposal) informed exclusively by a brief inspection under outlier weather/seasonal conditions for a particular species can result in disproportionate impacts and/or legal infractions during works.

3.3.5. Another major limitation, raised during the hearing, is in fully identifying and addressing off-site impacts. In the case of the Applicant's proposal, and the CRC in particular, the features where this would be most relevant would be hedgerows, tree lines and watercourses, which form part of a wider linking parcels of woodland, streams, ditches and ponds within the wider landscape. Possible example of sections which link potentially sensitive features east and west of the corridor include crossing points: 23, 25, 26, 27, 31, 34, 35, 38, 40 in the Hedgerow Removal Plans rev A **[REP3-103]**.

3.3.6. An example of where this limitation becomes apparent can be seen within the Applicant's precautionary avoidance approach to ditches within the CRC (see §7.5.1 of **[REP3-103]**). The decision as to whether use HDD or not to avoid impacts will rely on factors such as identifying a protected species which would be impacted.

3.3.7. While preliminary habitat appraisal within the CRC has accounted for a wider buffer than required, due to the linear nature of the cable works these can only account for limited sections of a particular ditch being crossed over. While these can be searched to identify protected species, it would not be able to directly observe or identify sensitive species located further downstream, and therefore gauge whether standard good practice sediment/silt trapping alone would be appropriate over more specialised measures or avoidance entirely.

3.3.8. Similarly, the approach opens itself to a risk of underestimating the value of individual, seasonally wet ditches; atypical weather patterns can result in a

temporary, dry condition for a ditch that is otherwise a critical commute route or breeding feature.

3.3.9. Limitations with current schedule of mitigation measures: It is important to caveat that comments on the adopted mitigations are significantly constrained by the lack of baseline data available for many species of conservation interest; depending on actual levels of activity, population size and species presence across the various work areas, it may be that some of the working approaches and measures being proposed are still adequate and proportionate to the actual degree of risks present. By the same token, it may be that measures that would be otherwise reasonable and proportionate for similar works elsewhere are inappropriate within the context of Lime Down, when concerning species where no targeted surveys have been carried out yet.

3.3.10. Birds: No specific bird surveys were carried out within the CRC. Instead, results from the Solar PV site surveys were assumed to apply as well, due to similarities in the broad rural character of the two development areas.

3.3.11. As no surveys have been carried out within the fields or those adjacent to the CRC's order boundaries, it is currently unknown whether these temporary disruptions and exclusions from fields may force them into adjacent areas already at full carrying capacity. While rural bird species are mobile, and can adapt to disturbances, this is relevant in the context of the development due to the requirement for undeveloped fields and pastures for many species. If developed these may be surrounded by less suitable, actively worked crop fields or woodland habitats which cannot support the species. The degree of these habitat-loss impacts will depend on the duration of the CRC works, particularly if subject to unexpected delays.

3.3.12. While this is notable for skylark and similar ground-nesting birds, this can also have implications on the foraging behaviour for declining, BTO Red- and Amber-listed birds of prey as well, which are similarly territorial. This is notable in

the context of this proposal due to the number of these species identified within the solar PV sites, including notably merlin.

3.3.13. Mr Valori also has concerns about the framing of operational impacts (in the oOEMP **[REP3-095]**) as being solely from a point of view of local foraging benefits, when effectively the degree of displacement even in ideal conditions of post-development enhancement will see a significant loss of habitat for over 70% of the local breeding population for the scheme's duration.

3.3.14. **Dormice:** Due to the lack of surveys, dormouse presence has been assumed by the Applicant across all suitable habitat within the order limits. The mitigation measures outline the carrying out of single-stage clearance preceded by a pre-commencement search for all works which affect these habitats, adhering to relevant Mammal Society guidance. Hedgerow gaps will be maintained up to 12m width on average, and up to 10m within the Wiltshire Impact Zones for Bat Species.

3.3.15. Public Records from the Wiltshire and Swindon Biological Records Centre show two records of dormouse nests being found north of Grittleton (ST 85150 81450). Habitats within this area are linked to the woodland parcels adjacent to Gauze Brook, and are adjacent to a proposed highway improvement area along Alderton Road. These linked habitats are adjacent to proposed crossing points 23, 24 and sections of 25. While relatively more distant, this population may also be relevant for hedgerow clearances at parcel 9, which is both adjacent to wooded habitat along the railway line, with the solar PV field enclosing a number of small woodland parcels within its boundary.

3.3.16. Under Mammal Society guidelines for single-stage clearances, the approach to be adopted limits works to May (accounting for potential clashes with nesting birds) and from mid-September to October in order to not result in significant impacts. This gives a window of at most 2.5 months a year where these single-stage clearances can be carried out. These can also be further restricted

by changes in seasonal weather, such as an especially cold autumn or an early summer.

3.3.17. While highway improvement works will not require hedgerow clearances, partial cutting back will be included for safety and visibility splays (see at §1.1.17 of **[REP3-101]**). Partial clearances of sensitive hedgerow such as this, while less impactful in the autumn prior to winter hibernation, can result in a significant decrease in available nesting and foraging habitat for dormice if carried out in the spring/summer, affecting local population. This is relevant for the proposal, as the necessary extent of these partial clearances along the various highway improvement areas are yet to be defined, and may be more extensive than the individually smaller gaps associated with the trench CRC and Solar PV sites. The north Grittleton highway improvement section is particularly sensitive in this case, as it is directly adjacent to the location of past dormouse nest records.

3.3.18. The submitted dormouse mitigation measures note the requirement of pre-clearance searches for all works affecting suitable dormouse habitat, the above timing considerations should be factored as well for the associated traffic works within the wider landscape.

3.3.19. While individual hedgerow clearance gaps will be limited where feasible, the scope of the scheme and linear nature of the CRC results in impacts and disruption taking place across a lengthy portion of the landscape. Mr. Valori therefore questions the assessment of direct harm being limited to the Site level, and not at the higher Local level. Even the temporary impacts on the species, currently assessed to be at the Local level, can be argued to be towards the higher end of this category given the scope of the corridor being considered; the linear requirements of the cuts result in clearances separating hedgerow sections at both the northern and southern boundaries of the majority of individual fields, increasing the cumulative degree of fragmentation.

- 3.3.20. Assuming dormouse presence across all hedgerows, woodland and scrub within the scope of the proposal, factoring alongside the limited seasonal window available for up to 1.7km of total hedgerow clearances, with possibly additional supervision required for associated highway improvement works, the proposal affords very limited flexibility in implementing its dormouse mitigation schedule. The proposal risks being in a position of requiring either long delays (which may clash with timing requirements outside the scope of ecology as well) or carrying out clearances at suboptimal times of year, significantly increasing the degree of disturbance and risk of injury/killing dormice and thus necessitating a licence beforehand regardless.
- 3.3.21. Assuming consistent dormouse presence at all required hedgerow crossings, the proposal is at risk of requiring further surveys and potentially a licence mid-works during the development. As the species is particularly elusive, and factoring in seasonal/weather limitations to pre-clearance searches previously raised, the main risk of this approach over carrying these out as a full baseline survey prior to works is the higher likelihood of discovering an infraction only once it has been accidentally committed, particularly injury or killing. Halting mid-works has also a knock-on effect on other aspects of ecological mitigation such as birds or reptiles, potentially requiring further re-surveys and amendments to other mitigation strategies with strict seasonal/timing requirements.
- 3.3.22. **White-clawed Crayfish:** While no species-specific surveys or trapping have been carried out within the solar PV fields or the CRC, presence of WCC has been assumed within all wet ditches and streams within the order limits. Precautionary mitigation methods will include pre-commencement searches prior to any works which will require sections of the ditch and watercourse to be removed.
- 3.3.23. The species is noted to be sensitive to pollution impacts from silt and sediment deposition. Associated run-off prevention measures of measures will

include use of silt fencing, temporary attenuation and siting of washdown and chemical storage areas, detailed in full within the oCEMP **[REP3-093]**.

3.3.24. When considering appropriate buffer zone widths from water features, such as those outlined in the context of BPF installation (in the oEPMS **[REP3-103]** at §3.3.8), these specify 8m minimum buffers from ditches, and wider buffers 10m-15m in width for minor watercourses depending on their ecological value. When the buffer specification widths were discussed at the hearing, it was noted that the 8m width specifically was decided in a context of BNG riparian zone definitions and flooding prevention.

3.3.25. Mr. Valori queries why, if WCC presence is assumed within all suitable water features, the more ample 10-15m buffer was not considered for the majority of wet ditches, or at least when these risked being associated with access and haul routes where risk of dust and sediment entering the feature are higher. If buffer width is instead to be amended upon discovery of a WCC during the pre-commencement search shortly prior to works, Mr. Valori is concerned that impacts within said watercourse will have likely already arisen by then in order for machinery and crews to access the area. This is relevant within the context of the project, as access requirements will entail a degree of permanent culverting across watercourses, which in turn could be a source of further silting throughout the construction and decommissioning phases, and to a lesser extent during operational maintenance.

3.3.26. This is also an example of how assuming presence can lead to underestimating impacts, as the lack of a precise location data/population size makes it difficult to apply mitigation measures that are not practical. This can lead to mitigation measures that are excessive where not required, and insufficient where they should be focused on.

Outline Construction Environmental Plan [REP3-093]

3.3.27. Table 3 discusses the need for construction site lighting during the winter months, with the EcoCoW to be consulted to determine best luminary specifications and locations to minimise light spill impacts. The Applicant has further outlined a preliminary ecologically sensitive lighting strategy, conscious of the sensitivity of light disturbance within Lime Down C and within the Wiltshire Impact Zones for Bats within the CRC.

3.3.28. In respect of Table 3 of the oCEMP, Mr. Valori queries the approach to lighting and has concerns about the extent to which this lighting will be required within the CRC. Works within this section will be taking place at the same time at various points along the corridor. Seasonal restrictions for hedgerow clearance, and preferable avoidance when crossing undeveloped fields, suggests that the bulk of works would need to be carried out in autumn or late spring.

3.3.29. Given the extent of the CRC and number of individual ongoing construction areas within it, Mr. Valori questions whether there could be a risk of cumulative lighting impacts within the CRC. Mitigation states precautionary measures such as directing mobile lighting towers away from hedgerows, woodland and watercourses as possible (see at §5.2.3 of [REP3-103]). Mr. Valori, however, would question the proximity and frequency of these towers between different work sections; while ideally lighting specifications will help limit lux levels on flight corridors, if low levels of disturbance are consistently present across multiple adjacent sections of the CRC this could still represent a lengthy flight barrier across the landscape for particularly sensitive species, such as lesser horseshoe bats.

3.4. Heritage

3.4.1. At [REP3-129], the Applicant has provided comments on the submissions made by SLD at Deadline 2. At SLD-071, the Applicant provides a response to SLD's submission that the specific condition relating to highway improvements

and site access southwest of Rodbourne to be a relevant requirement to assist in mitigating the effects identified by the Council and SLD on that heritage asset. It is noted that the Applicant has updated the Outline CEMP to include provision that the Wiltshire Council Conservation Officer should be consulted on the approval of design for the access. However, SLD's heritage expert remains concerned over the ability of the conservation officer to comment and control the Outline Construction Traffic Management Plan to mitigate against harm to the Rodbourne Conservation Area, particularly where heritage concerns conflict with highway operational needs.

3.4.2. At SLD-118, the Applicant responds to SLD's concern that the letter from Historic England confirms that winter views may reveal more of the development. SLD note that both Historic England and Wiltshire are now in agreement with the approach taken and the accuracy of the visualisations. While SLD has some remaining concerns, it is accepted that these are relatively minor and SLD does not take a further point on this.

3.4.3. At **[REP3-141]**, Wiltshire Council has provided comments on the other submissions received at Deadline 2. SLD agrees with the concern expressed by the Council's heritage officer at §4.31:

"The council has 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."

3.5. Glint and Glare

3.5.1. To contextualise the information that has been provided by the Applicant, this section refers to a meeting took place between the Applicant's glint and glare experts, Pager Power (James Plumb and Hannah Lucey) and SLD's expert John

van Hoogstraten (of Straten CSL) on 25 June 2026. During that discussion, the parties explored the Applicant's Photovoltaic Glint and Glare Study **[APP-261]** and the accompanying Glint and Glare Modelling Outputs Part 1 and 2 which had been submitted at Deadline 3 **[REP3-137]** and **[REP3-138]**.

3.5.2. The methodology relied upon for assessing impact significance in Annex D was explored. Mr. Van Hoogstraten sought to clarify how the set of thresholds were determined for impact significance. Pager Power explained that they were derived through their experience and from publicly available guidance they had drafted. SLD has now been provided a copy of this guidance, but notes that it includes a confidentiality clause; SLD consider the Applicant should secure confirmation that the guidance can be submitted to the Examination and then submit it as soon as possible.

3.5.3. SLD would question the integrity of relying upon this guidance given it was produced solely internal to Pager Power, as opposed to being industry verified. Mr. Van Hoogstraten is unable to verify the integrity of the thresholds relied upon by Pager Power in the absence of verifiable information being provided. This includes understanding how both sensitivity of receptors but also magnitude of effect is assessed. Additionally, given the scale of the proposed scheme, standard guidance is not sufficient for properly assessing the scheme. Consideration must also be made to the size and disaggregated nature of the proposed development.

3.5.4. In relation to cumulative and multi-directional effects, the size and scale of the proposed development was again raised and how the quantitative thresholds were evaluated against their own guidance. The Pager Power reports do not provide any clear evidence of expanding the cumulative or multi-directional aspect of this proposed development. The Applicant explained that the reality is that solar reflection was recorded for each receptor and the latest modelling outputs (Parts 1 and 2) provided that data. Mr. Van Hoogstraten stated that this data was not available in the original submission and that verifying the textual content of the report against actual data made validation impossible. Pager Power

explained that they used their own software, as opposed to ForgeSolar which is widely used internationally. Mr. Van Hoogstraten again queried whether the Pager Power software had been independently validated; it would appear it has been adopted internally at Pager Power rather than being assessed in the industry.

3.5.5. In Mr. Van Hoogstraten's view, Pager Power's approach causes concerns for the reliability of the data and understanding the conclusions reached. Pager Power has produced an extensive report using software that has not been validated and without providing a full set of data. That is inconsistent with industry expectations (as per ForgeSolar software) that allow for independent checking of results and the interpretation of these results.

3.5.6. Mr. Van Hoogstraten queried whether the Applicant's accepts that a receptor may experience glare from multiple arrays during the same flight or journey. Pager Power explained that they considered it unlikely that two arrays would cause solar reflection at the same time. Mr. Van Hoogstraten disputes this. The proposed development surrounds a large area rather than being to one side. As a result, some receptor points are subject to multiple arrays (one behind another), and a moving receptor would result in arrays impacting at different points in the transit.

3.5.1. SLD note that technical modelling was not completed for local roads. At the meeting, Pager Power explained that local roads were excluded on the basis of low use and the likelihood of a multi-car pile up as a result. Mr. Van Hoogstraten disputes this approach. The probability of an occurrence is not calculated on volume but on an event occurring. A narrow, local road with a similar speed limit (60 mph) to regional or national roads could result in a higher potential for an accident especially given the narrow road/lane environment often shared with other road users (cyclists, walkers, horses). The Pager Power reports discounted local roads on the basis of frequency without evidence of what volume of traffic is considered applicable. The assumption is that local roads are not busy but that is not validated in the Pager Power reports. Overall, it is considered that the apparent conclusion that the sensitivity of local roads is low is an

underassessment given the susceptibility of the receptor and the severity of any effect that might eventuate.

3.5.2. In relation to aviation, Mr. Van Hoogstraten asked whether Pager Power accept that pilots at uncontrolled airfields rely entirely on visual separation. Pager Power explained that their guidance applies additional considerations for these types of airfields. Mr. Van Hoogstraten reiterated that, given the size and spread of the proposed development, the guidance should form part of the analysis, but the cumulative and multi-directional nature of the environment needs to be the primary areas of focus to determine impact.

3.5.3. Pager Power stated that the probability of an aircraft being impacted by visual impairment is low. Mr. Van Hoogstraten stated that this mistakes the proper approach to aviation safety management; a proper hazard and risk assessment must be considered on the assumption that glare is encountered consistently with the probability not evidenced at number of flights but the probability of glare (size and direction) be considered together with consideration towards severity. This case is not the straight application of FAA guidance due to the size and disaggregated nature of the proposed development.

3.5.4. In respect of the quantitative thresholds applied by Pager Power in their reports, these thresholds focus purely on visual disturbance to a receptor without providing clear evidence of the cumulative and multi-directional impact of this particular proposed development. Solar farms must use guidance in a proportionate and reasonable manner reflecting the magnitude of the development. Applying a single guidance mechanism to a single roof array to a development the size of Lime Down requires extensive analysis and robust arguments with an evidence-based approach.

3.5.5. In conclusion, Mr. Van Hoogstraten considers that the Pager Power report and modelling outputs lack sufficient data and robust evidence specifically around quantitative thresholds, hazard and risk analysis, sufficient evidence

demonstrating impact as a result of cumulative and multi-directional impact of solar reflections. The fact that this study was undertaken using Pager Power-developed software that has not been independently validated brings into question the validity of the results together with the interpretation of these results. The Pager Power guidance is essentially their own internal guidance made available to others as requested. Given the safety-critical nature of this issue, such guidance needs to be independently assessed against industry-recognised criteria. Mr. Van Hoogstraten does not consider it is enough to point to the use of the guidance in the past without it being tested by external expertise. This guidance has apparently not been peer-reviewed; the acceptance of the guidance by clients must not be perceived as expert acceptance. The Pager Power report and supporting modelling outputs provide more of an opinion-based paper, based on Pager Power guidance and software, than industry accepted systems and processes (e.g. safety assessment). For a peer review to be effective, it must follow an evidence-based approach.

3.5.6. SLD would welcome written confirmation of Pager Power's responses to the following questions:

- Have the relevant qualitative thresholds been published, and if so where?
- What quantitative thresholds separate "No Impact", "Low", "Moderate" and "High" impact?
- How many minutes of green glare or yellow glare would trigger a Moderate or High impact within Pager Power's guidance?
- If no thresholds exist, is the assessment ultimately based on professional judgement rather than objective criteria?
- Has Pager Power assessed cumulative glare from all arrays combined or largely on an array-by-array basis?
- How was the overall scale of this solar development accounted for?
- What is the cumulative/ multi-directional threshold that triggers a Moderate or High impact?

- How is cumulative/multi-directional exposure incorporated into the significance assessment?
- Why is low traffic volume considered a factor indicating local roads are low sensitivity given the context of such roads and when the consequence of visual impairment could still be severe?
- Pager Power frequently argues that glare occurs when the sun is already low and therefore pilots or drivers are already exposed to bright sunlight. Can they provide evidence showing the reflected glare and the sun occupy the same visual sector given the expanse of the proposed development? Can they demonstrate this geometrically rather than through qualitative statements?
- At Badminton Airfield, how many annual minutes of yellow glare are predicted?
 - In which months and at what times of day does it occur?
 - Why was the impact classified as "Low" given the cumulative/multi-directional nature of the glare?
 - What evidence supports the statement that effects can be "operationally accommodated"?
 - Has Pager Power consulted Badminton Airfield pilots regarding operational acceptability?
- At Bowldown Farm Airfield:
 - Did Pager Power assess cumulative glare across all contributing arrays?
 - Does Pager Power consider over 12,000 minutes of annual green glare to be insignificant?
 - What evidence supports that conclusion?

3.6. Hydrology

3.6.1. At Deadline 3, the Applicant made various revisions to Chapter 11 of the ES in response to questions raised by the ExA and the Environment Agency [**REP3-**

016]. It is noted that at §11.9.2 the Applicant provides further information around watercourse crossings, provision of SuDS and sediment control measures and the Water Management Plan. Under “Drainage and Surface Water Management” it is clarified that pre-commencement ground investigation will inform any subsequent detailed assessment construction methodology “where groundwater may be encountered.” Given groundwater may be encountered anywhere, SLD seeks further clarity as to when such investigations will be conducted.

3.6.2. Within the Applicant’s Flood Risk and Drainage Strategy Covering Report **[REP3-048]**, the Applicant characterises infrastructure into four types with different levels of drainage: 1. Large infrastructure requiring formal drainage; 2. Permeable structures like tracks; 3. Small infrastructure where gravel-filled soakaways are sufficient; and 4. Panel areas, which will have no drainage. While this information assists in understanding the Applicant’s approach to the drainage strategy, SLD’s criticism persists in respect of the lack of drainage strategy for panel runoff.

3.6.3. At Deadline 3, the Applicant has provided updated flood risk and drainage strategies for the individual sites **[REP3-050]**, **[REP3-052]**, **[REP3-054]**, **[REP3-056]**, **[REP3-058]**, **[REP3-060]**, and **[REP3-062]**. It is noted that the design event assessment as shown in the FRAs is still the 0.1% AEP plus climate change Manning’s assessment which produces absurd results. Additionally for all sites (save for E2), an identical summary has been provided of flood risk:

“During the construction phase, 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, and construction activities will be undertaken in accordance with the Outline CEMP **[REP2-019]** to ensure flood risk is not increased elsewhere.”

3.6.4. This raises the question as to what would happen when it is not “reasonably practical” to store material outside flood-susceptible areas, and whether there

should not be a commitment to design the scheme so that construction compounds and significant material storage is always outside such areas.

3.6.5. SLD note that Appendix 11-6 for Lime Down D BESS **[REP3-058]** and Appendix 11-8 for Lime Down E2 **[REP3-062]** have changes relating to equipment resilience in flooded areas and the BESS. The Applicant explains:

“For both fixed and tracker panels, all sensitive electrical equipment mounted on the Solar PV Panels will be elevated by the supporting legs or frame 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 does not comprise sensitive electrical equipment and may sit lower depending on the final fixed or tracker arrangement.”

3.6.6. SLD notes that the panels could therefore sit below 0.6m above the design flood level.

3.6.7. The Applicant has also updated its site fluvial and surface water flood risk maps **[REP3-027]** to **[REP3-033]**. The Flood Risk maps have been updated to show fluvial and surface water risks on the same map (two separate maps previously). Additionally, 2m contour intervals and the direction of overland flow routes have been added. However, there is no statement of how the overland flow routes have been calculated. Additionally the Rodbourne Brook is mis-labelled “Sutton Benger Brook” on Figs. 11-6 **[REP3-032]** and 11-7 **[REP3-033]**.

3.6.8. In respect of the table at FHW1.2-1 in **[REP3-128]** representing the Applicant’s response to Table 1 of Appendix F1 to SLD’s WR **[REP1-174]**, SLD has produced a table in response at Appendix C to this document.

3.7. BESS Fires

3.7.1. At **[REP3-107]**, the Applicant has provided an updated outline battery safety management plan. The following comments are made.



Stop Lime Down Deadline 4

3.7.2. Clarity is sought as to whether a BESS supplier has been identified. At §1.2.2 of **[REP3-041]** (the Applicant's updated Appendix 3-1 Substations and BESS Description), the Applicant explains that it anticipates using "the Sungrow 'ST5015UX-3H 314 Ah' BESS Containers or similar." At §§4.1.30-4.1.36, the Applicant has referred to several possibilities and criteria for the identification of an appropriate BESS. The Applicant should clarify why the Sungrow model is considered to meet its criteria for safe BESS design.

3.7.3. SLD is concerned by the Applicant's proposal to defer a further Plume Study to the detailed design stage. It is unclear why a Plume Study cannot be carried out at this stage, given the location of the BESS and the likely model have been identified. Plainly, the conclusions of such a Plume Study will detail relevant effects of a BESS fire incident which the ExA should take into account at the DCO stage. It would also provide the Applicant with the opportunity to model ultrafine particulates and address some of the other criticisms made below.

3.7.4. At **[REP2-042]** the Applicant has provided a detailed response to SLD's Deadline 1 submission on BESS fire emissions. SLD's response is provided in turn below.

Only One Container Affected (2.1)

3.7.5. The original risk assessment **[APP-239]** modelled a "fire" (thermal runaway event) in only one container. SLD's Appendix I2 to its WR **[REP1-181]** submitted that a worst-case scenario should involve all 270 containers. The detailed response explains that modern BESS systems are designed to restrict the fire to one container and these have been proved to work using Large Scale Fire Testing. Use of such systems will be secured in the DCO. A fire involving all containers (or even more than one) is thus not a credible worst-case scenario. It is asserted that the two incidents cited from 2025 did not have these modern protections and are thus not relevant. SLD maintains its position is a reasonable worst case as at the least account must be taken of the very measures to stop

spread failing, and thus a fire involving a reasonable number of containers should be modelled.

3.7.6. The Applicant's assertion that even at the Moss Landing fire "air quality impacts in the surrounding area were generally transient and below public health thresholds" (§2.1.15) is doubtful. Although monitoring of gas concentrations in the area started remarkably quickly, it was still the day after the fire started, and monitoring understandably concentrated on places where people lived rather than the position of the pollutant plume (see Applicant's Ref 8). A few exceedances of the PM_{2.5} standard were in fact detected. Technically it is very difficult to capture localised effects from an acute pollutant event in real time, but it does not follow that effects do not occur.

3.7.7. The Applicant's relies upon an assessment by the Fire and Risk Alliance in 2025 at Reference 9, entitled "Assessment of Potential Impacts of Fires at BESS Facilities." SLD have been unable to identify this paper. SLD requests this paper be provided to SLD outside of the Examination (or submitted to the Examination), as well as all the references referred to in the detailed response are provided by the Applicant. Reference 9, in particular, is relied upon by the Applicant at seven points, and is clearly an important reference for the ExA to be aware of.

Dispersion Distance (2.3 and 2.4)

3.7.8. SLD's Appendix I2 to its WR **[REP1-181]** criticised the original BESS Fire emission modelling for restricting the analysis distance to 1 km from the source, when it was clear that the pollutants would travel further, and the concentration peak could well be further than 1 km. In response several points are made:

- At §2.3.3, the Applicant explains that "a 1 km study area was selected based on professional judgement and precedent from similar schemes, including published assessments for comparable BESS developments, such as Green

Hill Solar Farm.” This is not a response to the concerns raised and an objective and reasoned justification for this approach should be provided.

- Additionally, at §2.3.3 the Applicant explains that “the NFCC’s latest guidance (Ref 4) identifies a 1 km distance as appropriate for emergency planning purposes”. The NFCC guidance mandates that sensitive receptors within 1 km must be mapped, not that the analysis should be restricted to this distance.

3.7.9. At Annex A the Applicant provides a contour plot of pollutant concentrations round the modelled fire, per SLD’s suggestion in Appendix I2. The plot shows modelled 1-hour hydrogen fluoride (“HF”) concentrations resulting from a fire in one BESS container, using meteorological data for 5 years. The Applicant uses the data to show that “the contours demonstrate that modelled HF concentrations peak within 1km of the BESS and decrease rapidly with distance beyond this ...The modelling therefore focuses on the zone where concentrations are highest and most relevant to exposure, which is in close proximity to the source” (§2.3.4). That concentrations are highest closest to the source is not surprising for a fire at ground level. Rather, the crucial point is whether receptors are being put at risk, whatever distance from the area. Restricting the analysis distance to 1 km prevents this question from being answered, whereas the contour plot allows an analysis.

3.7.10. The plot shows that concentrations around the source are about 400 $\mu\text{g m}^{-3}$. The concentrations at the nearest permanently-occupied receptors are around 55-70 $\mu\text{g m}^{-3}$ (Bradfield Manor, Townleaze Farm and houses in Hill Hayes Lane). Hullavington Primary School also appears to be within this range, although it is difficult to tell because the base photograph is of poor quality.

3.7.11. In this instance, concentrations of HF outside the 1 km zone do not exceed exposure standards, given emissions from only one module. It does not follow that this could have been deduced *a priori*. Analysis needed to be done at a greater distance in order to demonstrate this. The Applicant also claims (§2.3.4)

"The characteristics of dispersion (relationship between concentration and distance from the fire) is the same for every pollutant emitted...". This is unlikely to be true. HF is very reactive and very soluble in water. It will thus deposit more quickly, and under wet conditions, be rained out more effectively, than less reactive pollutants such as CO and NO₂. These will therefore travel further than HF relative to their concentrations close to the source. It is the low concentrations close to the source (relative to health standards) which imply, in this case, that it is not necessary to investigate concentrations further afield.

Selection of Assessment Criteria (2.5)

3.7.12. This concerns particulate matter ("**PM₁₀**"). It is agreed between SLD and the Applicant's consultants that there is no directly-applicable short-term standard for PM₁₀ comparable to the AEGL values used in the rest of the assessment. The Applicant therefore substitutes an occupational health guideline of 4000 µg m⁻³ for respirable particles. SLD suggested in SLD WR Appendix I2 [**REP1-181**] that occupational health standards were inappropriate because (a) they assume healthy adults; (b) they assume exposure only during the 8-hour working day; and (c) they assume a degree of worker acceptance of the conditions. For (a) people who may be more vulnerable to pollution because they are unwell, children or elderly; (b) potentially exposed for more than the working day and (c) having the pollution imposed on them; a more restrictive standard is needed. SLD suggested the World Health Organisation ("**WHO**") 24-hour standard of 45 µg m⁻³ was more appropriate, noting that 3 exceedances a year are allowable. Alternatively, the UK National Air Quality Objectives, which are slightly less stringent, could be used (50 µg m⁻³ with 35 exceedances in England, 7 in Scotland). The Applicant disagrees, stating "The main purpose of the air quality objectives and WHO guideline levels is to protect the population over their lifetime" (§2.5.5). This is incorrect. The purpose of a 24-hour standard is to protect the population over 24 hours. If it is necessary to hold concentrations below 45 µg m⁻³ to protect people over 24 hours it is inconceivable that concentrations can be allowed to reach 4000 µg m⁻³, almost 2 orders of magnitude higher, over an 8-

hour period and still be protective. While it is accepted that there is no appropriate standard, the 24-hour standards are a much closer approximation to what is needed. Given that BESS fires often burn for longer than 24 hours, a 24-hour average is not unrealistic.

Assessment of Near-Field Receptors (2.6)

3.7.13. SLD queried why there was no assessment of pollutant concentrations in Hill Hayes Lane and the main line railway, given that that these are the closest receptors involving people. The Applicant explained (§2.6.2) “Human health receptors were not included in the model on Hill Hayes Lane because it has no pavement...”. The lack of a pavement is not a basis to exclude this receptor. Hill Hayes Lane is used frequently by dog walkers out from Hullavington and also by cyclists seeking a quieter road than the one through Norton. In response to Appendix I2 **[REP1-181]**, the Applicants have supplied an assessment of the concentrations due to a single-container BESS fire (Table 1). The PM₁₀ concentrations are below the 4000 µg m⁻³ occupational health guideline, but as noted above, this is not an appropriate standard to use. The modelled concentrations are considerably higher than the 24-hour standard of 45 or 50 µg m⁻³, and as noted in Appendix I2, the modelled fire could be generated for 24 hours to obtain a 24-hour mean for a valid comparison. Although no-one will be present on the road for 24 hours, there are residential receptors not far away.

3.7.14. The Applicant states (§2.6.4) “The railway was not included as a human receptor for pollutant concentration assessment because it is not a publicly accessible location where individuals would reasonably be present for sustained periods, and any interaction between a passing train and a buoyant fire plume would be brief and transient in nature.” This is acknowledged, but trains do stop, not least because there is a fire in a BESS adjacent to the line. Assessing a stationary train in the railway cutting adjacent to the BESS would be a properly precautionary approach.

Emissions Data and Assumptions (2.7)

3.7.15. In Appendix I2 **[REP1-181]**, SLD criticised the use of a diesel fire as a proxy for a Li-ion battery fire as a source of particulates, and pointed out that there were data which allowed the calculation of particulate emissions from Li-ion battery fires directly. These gave emissions which were 2.5 to 4.66 times greater than the Applicant's method. The Applicant notes that the direct measurements were based on cell-level testing rather than a whole BESS container, which would probably generate different concentrations. While this is acknowledged to be very likely, it still seems better to us to use data from real Li-ion fires rather than a surrogate. The Applicant concludes (§2.7.10) "Final risk assessments, consequence modelling, and Emergency Response Plans can only be developed once the selected BESS design is defined, including system configuration, operating parameters, and test data." SLD would suggest that there should now be enough information to select a detailed BESS design and test it appropriately, which would resolve some of these issues.

3.7.16. SLD suggested in Appendix I2 **[REP1-181]** that ADMS was not a suitable model for situations such as a cloud of heavy vapour being produced in humid conditions and sinking into the adjacent railway cutting. The Applicant agrees (§2.8.3) but states that such conditions are unlikely for various reasons including thermal plume rise and wind direction. They state (§2.8.10) "evidence from real-world BESS fire incidents indicates that emissions are short-lived, highly dispersed, and localised to the vicinity of the fire, with no empirical evidence of hazardous vapour clouds forming or accumulating in low-lying areas at distances relevant to public exposure". However, the majority of BESS installations are in warm, dry places. A conceivable scenario is a release on a misty night in the Cotswolds, when the HF dissolves in the mist to form the even more toxic hydrofluoric acid, rapidly loses its thermal buoyancy, and flows into the adjacent railway cutting.

Additional Pollutants (2.10)

3.7.17. SLD's experts pointed out in Appendix I2 **[REP1-181]** that some pollutants had not been considered, notably ultrafine particles ("PM_{2.5}") which ADMS is capable of modelling. The Applicant agrees that these are produced, but cites the absence of short-term standards to compare them with as a reason for not modelling them. SLD's experts suggested that the precautionary principle should be applied here, and they should not be neglected because this is an evolving field and data are scarce. We note that the Applicant states in conclusion (§2.10.9) "Finally, it should be noted that a further Plume Analysis Study would be undertaken at the detailed design stage, based on BESS-specific fire testing data for the selected system. This would allow refinement of emissions characterisation (including particulates and trace compounds where measurable) and ensure that the Emergency Response Plan is informed by the most up-to-date and representative data available." We agree with the suggestion to include particulates (including PM_{2.5}) and trace elements in this final assessment, and suggest it should be included as a requirement in the DCO.

3.8. Human Health

3.8.1. The proposed development raises significant concerns in respect of public health, most notably in respect of its potential impact on community identity and culture, and the associated mental health challenges, stress and anxiety this will cause those who live near the Scheme.

3.8.2. Requirement 4 of Schedule 2 of the draft DCO provide for a community liaison group ("**CLG**") to be established prior to the commencement of the authorised development which must be administered by the undertaker and operated in accordance with the approved terms of reference. The CLG is expected to meet until "the date of final commissioning of the authorised development unless otherwise necessary."

3.8.3. It is very important that the CLG provide communities a genuine opportunity to engage in collaborative dialogue with the promoter of the scheme, allowing the

community to shape the emerging project effectively. In addition, and as is already noted in SLD's post-hearing submissions for ISH4, SLD considers that the period for which the CLG operates should extend into the operational part of the lifetime of the scheme.

3.8.4. SLD would welcome further information in respect of the CLG, including clarity as to the involvement of the local community in the design process. In particular, it is noted that there have been Relevant Representations from 23 parish councils. SLD would welcome a commitment from the Applicant in its communication strategy that the CLG will liaise directly with local parish councils. Parish Councils will often be best placed to effectively communicate matters with local communities.

3.8.5. However, for the avoidance of doubt, SLD does not consider the CLG to be an effective forum for resolving the mental health issues arising out of the proposed development. SLD remain concerned that the scheme will lead to rising rates of stress, anxiety and depression throughout the construction phase and as a consequence of the drastic changes to the landscape. This will inevitably place a strain on local health resources.

3.8.6. SLD supports the requirements proposed by Wiltshire Council in its Local Impact Report **[REP1-137]** at p.224, as follows (SLD previously expressed support at §3.2.8 of **[REP2-051]**):

- No part of the authorised development may commence until a communication strategy be submitted and approved, with measurable and accountable outcomes for the mitigation on community identity and resilience impacts.
- No part of the authorised development may commence until a Decommissioning Strategy is submitted and approved, to include mitigations for the impact on community identity and resilience.

3.8.7. In respect of both of these provisions, SLD consider that the requisite inclusions should be made in the Outline CEMP (at section 2.1) **[REP3-093]** and Outline Decommissioning Strategy (at section 2.10) **[REP3-097]**. This should set out, at the outline stage, parameters within which the CLG and the Community Liaison Officer will operate, but also measures in outline to manage community to identity and resilience.

3.8.8. In addition, and as reflected in SLD's comments on the Applicant's response to question HW1.1 (set out below), SLD consider that the Applicant should explore additional proposals to mitigate the harm which the Scheme will have on the local community, up to and including:

- Investing in the development of community assets and events as mitigation and enhancement; and
- Funding local mental health organisations to enable them to mentor those who volunteer to undertake wellbeing support roles.

3.9. Climate

3.9.1. At Deadline 3 the Applicant produced a Climate Response paper **[REP3-132]**. A response from SLD's experts is provided at Appendix D to this document.

3.10. Soils, agriculture and ground conditions

Outline Soil Resources Management Plan **[REP3-099]**

3.10.1. At Deadline 3, the Applicant provided an updated outline soils resources management plan ("**SRMP**").

3.10.2. Mr. Franklin has further considered this Outline SRMP. He notes that the Plan should consider a pre-entry schedule of condition for the soils, to include soil health assessment alongside the ALC report. Mr. Franklin considers that this will provide a more detailed benchmark against which to judge post-decommissioning

status and also to assess the progress of the site during operation. Particular attention should be paid to areas where soils will be stripped for any significant period of time.

3.10.3. In respect of the Outline SRMP, Mr. Franklin has had regard to the relevant code of practice. The main document is the Defra Construction Code of Practice for the Sustainable Use of Soils on Construction Sites. It describes the following key points:

- Key -management principles:
 - **Storage Limits:** Limit stockpile heights to maximums of 3 meters for topsoil and 5 meters for subsoil to prevent severe compaction.
 - **Site Selection:** Choose dry, level, and protected ground, keeping a minimum 10-meter distance from any local watercourses or steep slopes.
 - **Separation:** Keep different soil types strictly separated. Store "like-on-like" (e.g., store topsoils on pre-stripped topsoils) and use geotextiles between distinct layers.
- Handling and Shape
 - **Dry Conditions:** Only strip and move soils during dry, workable weather. Wet soil handling destroys soil tilth and structure.
 - **Angle of Repose:** Shape bunds with stable, manageable side slopes between 25 degrees and 45 degrees.
 - **Firming:** Mound with tracked equipment (to spread weight) and avoid running heavy machinery over the stored piles.
- Long-Term Maintenance
 - **Vegetation Cover:** If storing for longer than 6 months (or over the winter), immediately seed bunds with a suitable grass mixture (e.g., non-aggressive, native perennial grasses) to bind the soil and prevent erosion by wind and water.
 - **Weed Control:** Regularly cut the grass (at least twice a year) and treat for noxious weeds to stop them from taking over the mound.

3.10.4. Above all, wet soils should not be placed in stockpiles, so as to minimise the risk of compaction. Soils should not be handled when wet – that is consistent with the DEFRA and AHDB soil guidance, and would avoid the issue altogether. The SRMP should make it clear that this is a ‘golden thread’ running through the document. Soils should be stockpiled according to the recommendations in the final detailed SRMP – which should include a height range for different soil types, considering their wetness characteristics and susceptibility to damage, including by compaction.

3.10.5. Soil health is a key issue and whether soils can maintain or improve soil health whilst in a bund, is considered unlikely. A key factor which Mr. Franklin has increasingly requested in respect of developments is a schedule of condition of the land before construction starts so that there is a benchmark against which future restoration can be judged. This should be included in the SRMP. This should include the recognised series of tests and assessments that can be conducted on site as part of a visual evaluation of soil structures:

- Soil texture and depth of each horizon
- Earthworm counts
- pH
- Nutrient status (typically N, P and K and some micronutrients and any contaminants)
- Soil organic matter / soil carbon percentage
- Bulk density
- Infiltration/ hydraulic conductivity
- Water holding capacity
- Aggregate stability
- Porosity
- Soil structure and aggregate distribution



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3.10.6. Each of these can be assessed or measured fairly easily from representative samples taken during the ALC or at a similar time. Some of the information is contained in the ALC reports but not specifically aligned to soil health and a schedule of condition. Mr. Franklin notes that it is in the interests of the landowner that will ultimately retain the land after decommissioning that these steps are taken.

3.10.7. The above will enable a preparation of a suitable baseline of soil health, against which a soil handling programme – including proposals for stockpiling – and any future restoration can be assessed.

Outline Landscape and Ecological Management Plan [REP3-103]

3.10.8. Mr. Franklin notes that, at §1.3.9 provides for the planting of wildflower seed directly onto the stubble of previous arable crop. This raises concerns about the fertility of these soils and whether an appropriate wildflower seed could establish on this land. The Applicant should clarify how it intends to manage this issue, including the risk that the use of species of grass that can tolerate higher fertility may come to dominate the pasture and make reaching a true biodiversity mix difficult or even impossible to establish.

4. Comments on Responses to ExQ1

Reference	Question	Comment on Response
CH1.2 Applicant	Heritage Visualisations 1 Paragraph 4.5.1 of ES Appendix 12-1 (Heritage Statement) [APP-219] states that heritage visualisations were agreed with Wiltshire Council on January 2024 (Annex E). However, Annex E only provides a list of heritage viewpoints. Can the applicant please direct the ExA to where the visualisations for these viewpoints are provided? If they have not been provided with the application material, then these are to be provided in response to this ExQ. Historic England and Wiltshire Council are also invited to suggest additional visualisations which they consider should be provided by the applicant to assist the	4.1.1. Further visualisations have been provided in response to the Examiners' question CH1.2. The Applicant's response clarifies that these visualisations were not issued as supporting figures to the Heritage Statement, but that finalised versions have since been prepared. Clarity is sought whether, given those visualisations, the Applicant maintains their assessment. 4.1.2. SLD's heritage experts note that the Applicant has provided a technical addendum to Chapter 12 to include heritage viewpoints in [REP3-135] and [REP3-136]. SLD's expert notes that these viewpoints show the existing view and the extent of the proposed infrastructure on site, however an indication of the appearance of these proposals within these views (e.g. by a wireframe showing what is blocked, even if the screening is total) is not provided. It would be helpful to have updated comments from Wiltshire Council and Heritage England on these viewpoints.

	examination, and may find the following documents helpful to inform their consideration – ES Figure 8-10 [APP099] and ES Figure 12-1 [APP-143]. The applicant is subsequently requested to provide the additional visualisations or justification as to why not.	4.1.3. SLD further agrees with Wiltshire that an additional viewpoint should be provided to allow for a full assessment from Farleaze Farm.
CH1.3 Applicant	Bradfield Manor Visualisations At D1A the applicant submitted visualisations showing the view of the proposed development from Bradfield Manor [REP1A014]. The visualisations appear to just highlight the footprint of where solar development would be located. Given the height of the solar PV panels, the applicant is asked whether, at both year 1 and year 15, the existing field	4.1.4. Clarity is sought as to whether the existing field patterns which will be seen at year 15 will be the existing (historic) field patterns – as these are part of the setting of the Grade I Manor.

	pattern would be legible from these views or would the collection of fields where solar PV panels are proposed appear as a single mass of solar development?	
FHW1.1 Applicant	Policy Compliance - Larger PV Panels Paragraph 2.10.84 of NPS EN-3 (2023) states: ‘Where a Flood Risk Assessment has been carried out this must be submitted alongside the applicant’s ES. This will need to consider the impact of drainage. As solar PV panels will drain to the existing ground, the impact will not, in general, be significant.’ The ExA note the applicant’s need for flexibility leading to the lack of confirmation	4.1.5. The Applicant responds [REP3-128] that “...the use of larger or tracking PV panels would not give rise to significant hydrology, flood risk or drainage effects beyond those assessed for the Scheme”. They do however accept that “panel size, height and tracking behaviour can alter the local redistribution of rainfall within a field, including drip-line location, local concentration beneath panel edges and the height from which water falls”. They state “The distinction that matters for flood risk is between redistribution of rainfall within a field and generation of additional runoff at the field boundary.” “...For redistributed water to leave the field as increased runoff, it must travel across the ground surface and reach a field boundary or watercourse as connected overland flow, at a greater rate or volume than under the existing condition. Whether that occurs is governed by ground cover, soil condition, soil compaction, erosion risk

	regarding the type of PV panels to be used. However, the use of larger PV panels, never used in the UK before, introduces uncertainties to their hydrological impact which cannot currently be supported one way or another with evidence on the ground. The applicant's assessment of Hydrology, Flood Risk and Drainage (Chapter 11 of the ES [APP-063] and supporting appendices seem to assume that the hydrological effects of different PV panels would be the same, regardless of panel dimensions. SLD submitted detailed analysis and research regarding surface water redistribution and concentration along the panels, the creation of drip lines, increased kinetic	and surface flow connectivity." "...The mechanisms identified by SLD in [REP1-174], [REP1-175], [REP1-177] and [REP1-183] are recognised risk pathways, but they are conditional. They may occur where ground cover is degraded, soils are compacted, or connected bare-soil flow paths are allowed to form. They are not unavoidable consequences of larger panels." 4.1.6. Stop Lime Down concurs with the essence of this analysis, while pointing out that overland flow is not the only mechanism whereby water can leave the site, and subsurface runoff (throughflow) through the upper soil horizons is also likely to be a significant contributor to water output and flood peaks. 4.1.7. The Applicant goes on to claim these risks are controlled through the Outline CEMP, Outline SRMP, Outline LEMP, and various management measures. SLD disagrees. The Applicant has made no attempt to assess the risks and simply assumes that the plans will be effective. The risk factors highlighted by SLD in [REP1-174], [REP1-175], [REP1-177] and [REP1-183] are not considered. The increased concentration of water by
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	energy of water falling from the panels, potential soil erosion, significant reduction of evaporation and increase of soil moisture [REP1-174, REP1-175, REP1-177 and REP1- 183]. This highlights potentially different impacts of larger PV panels which, coupled with the soil's sensitivity to compaction and low permeability, could lead to faster displacement of surface water runoff and potential increase of flood risk on and off site. <u>The Applicant:</u> As the ES does not include site specific analysis of the impact of different types of PV panels, the applicant is asked to explain their potential effect to demonstrate that	the larger panels, the greater kinetic energy of drops falling from a greater height leading to soil erosion, the sensitivity of local soils to compaction, the inevitability of some compaction whatever mitigation measures are used, and the low permeability of many of the local soils all need assessment as the ExA requests. That the Applicant has failed to assess this is a flaw. SLD will bring forward an analysis of these factors for discussion at the next deadline. 4.1.8. The Applicant does not accept SLD's reduced evaporation argument as a basis for concluding that the Scheme would increase flood risk (now at [AS-020]). Though they accept that the mechanism will lead to increased water availability, they state that as it operates on an annual water balance basis, and thus "this does not demonstrate a material increase in design storm runoff or downstream flood risk." In [AS-020], SLD proposed a mechanism whereby increased soil wetness due to reduced evaporation, particularly in the Autumn, would be likely to lead to increased flood risk, particularly offsite, and the Applicant has not addressed this argument. They assert that "Design events are already assessed using conservative antecedent conditions and climate change
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	they would not have significant impacts. <u>The LLFA:</u> The LLFA is asked to submit comments on the documentation provided by SLD (referenced above).	allowances”, but this mechanism will change the antecedent conditions and thus the result of the assessment. SLD will attempt to quantify this by the next deadline, and assess the cumulative effects.
FHW1.2 Applicant	Policy Compliance - Signposting The ExA note the contents of ES Volume 3, Appendix 5-1 National Policy Statement Requirements [APP-186]. However, SLD’s submission [REP1-174] includes a list of flood risk assessment requirements in pages 20-23. The applicant is asked to provide a detailed response to this table, but if the information is already contained within the application documents, please signpost the ExA to the specific relevant part of the	4.1.9. The Applicant does not agree with SLD’s conclusion that the Flood Risk Assessment meets only 6 of the 23 minimum requirements of NPS EN-1 §5.8.15. They state “SLD applies a binary pass or fail scorecard that does not reflect the proportionate, risk-based and mechanism-specific nature of the FRA process...”. This is incorrect. Table 1 in §51 of [REP1-174] contains a brief discussion of most points where the conclusion is that the requirements of EN-1 have not been met, making it clear that in some cases they have partially been complied with. The Applicant appears keen to avoid dynamic modelling except in the two areas where they feel it is appropriate, even though it is apparently mandated by EN-1 §5.8.15. The LLFA in its response to Section 2 Submissions ([REP3-141] section 7) notes that “The absence of integrated catchment-wide modelling limits understanding of system behaviour” and SLD agrees.

	documents, rather than just cite the document reference.	4.1.10. The Applicant has provided a point-by-point response to SLD's table with signposting to the relevant application documents." The response was eventually located as Table FHW1.2-1 on p.556 and is addressed in Appendix C to this document.
FHW1.3 The Applicant The LLFA	Flood Risk Assessment – Quantification of surface water and SUDS The outline drainage strategies [APP-210 to APP-218] provide no or little quantification of the impact of the proposed development on surface water runoff. This has been consistently raised as a concern by SLD and it is included in the SoCG as under discussion with Wiltshire Council [REP2-025]. The LLFA includes in [REP1A-017] information regarding Section 19 investigations for	4.1.11. The Applicant does not agree that the drainage strategies provide little or no quantification of the impact of the proposed development on surface water runoff, but in its defence cites only its assessments of what it calls "formal impermeable infrastructure", such as the BESS and substations. There is no quantitative assessment of runoff from the panel areas or the sites as a whole, which make up the majority of the site area. Instead, the Applicant relies on the assumption that its mitigation measures will be adequate to reduce any increase in runoff to insignificant levels (see answer to FHW1.1 above). 4.1.12. The Applicant persistently misdescribes SLD's position on runoff from panel areas as involving "connected impermeable hardstanding". Variants of this phrase occur seven times in the Applicant's response to this question. Neither SLD, the LLFA, or anyone else has ever suggested

	Whitley and Beanacre. Its conclusions are that flood risk is pathway-driven and catchment-based (rather than limited to mapped fluvial floodplains) and that ditch networks and overland flow routes act as conveyors. The outline drainage strategies do not include mapping of ditch networks or overland flow routes. Furthermore, the proposed development would introduce many impermeable elements (PV panel supports, smaller electrical infrastructure associated with PV panels, substations, BESS area, etc) which could potentially have important cumulative impact if not addressed on each site. The ExA note that the access tracks would be permeable but, due to soil	this as a method of calculating runoff from the panelled areas at Lime Down. Instead, SLD would like the Applicant to assess the effects of the oversized panels on rainfall redistribution and the consequential effects on runoff given the specific soil conditions at Lime Down, given the known propensity of the area to flooding. This needs to be calculated rather than assumed to be minimal. 4.1.13. The Applicant says it “will submit revised versions of the relevant ES Volume 2, Figures 11-1 to 11-8 [APP-135 to APP-142] at Deadline 3 with additional drainage information added where relevant and proportionate. The revised figures will show, where applicable: a. existing ordinary watercourses, ditches and drainage features where that detail is available; b. mapped surface water flood risk and overland flow routes; c. fixed or committed infrastructure with potential drainage implications; d. indicative permanent SuDS features or drainage zones where these are sufficiently fixed;
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	compaction, they could also become impermeable. The applicant proposes to use sustainable drainage systems (SUDS) and current site drainage to reduce surface water runoff to agreed rates. However, NPS EN-1 (paragraph 5.8.15, page 129) clearly requires the Applicant to <i>‘set out (approximately) the existing rates and volumes of surface water run-off generated by the site’</i>. The lack of quantification of the volume of water to be attenuated and lack of information regarding the SUDS to be implemented do not demonstrate that flood risk would not be increased and can be managed. We note the applicant’s response to the LIR [REP2-038] and Response to	e. conceptual drainage layouts for the BESS and substation locations, including indicative attenuation, discharge, containment or isolation principles where relevant; and f. indicative exceedance routing principles. g. High-level calculations and treatment of Scheme components” 4.1.14. The revised figures submitted at Deadline 3 (Figures 11-1 to 11-7: Site Fluvial and Surface Water Flood Risk Maps Rev 2 [REP3-027] to [REP3-033]) show items (a), (b) and (c) from the list above, but not (d) or (e), and is difficult to understand how items (f) or (g) could be shown on a map. The position of the SuDS features (item d) is important information given that they will need to be in lower parts of the sub-catchments, but will be ineffective in the Flood Zones. It is queried whether the Applicant is able to demonstrate that there is sufficient room for an adequate amount of SuDS. This can only be done by calculation of the required retention volumes, as the ExA requested.
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	D1A Submissions [REP2-040] which state that existing topography, drainage features, overland flow routes, surface water flood risk and watercourse connectivity across solar PV sites have informed the assessment. However, as outline drainage layouts or mapping of existing drainage features have not been submitted, it remains unclear how SUDS would interact with existing drainage features and other proposed mitigation measures. <u>The Applicant is asked to:</u> 1) Provide a high level calculation of the effect of all impermeable areas for each site, setting out the existing rates and volumes of surface water run-off	4.1.15. SLD notes that the revised flood risk maps show the direction of overland flow at different locations, but there is no explanation of how these are calculated. Also Rodbourne Brook / Gabriel's Well is mislabelled as "Sutton Benger Brook" on Figures 11-6 [REP3-032] and 11-7 [REP3-033]. 4.1.16. SLD notes that the Applicant intends to provide further information on this question at Deadline 4, but does not intend to update the landscape and Ecology Mitigation Plans [REP1-029] to [REP1-032], as requested by the ExA, at this stage, which would have enabled an assessment of the adequacy of the SuDS arrangements and their potential use in mitigating biodiversity loss. 4.1.17. On the final part of the ExA's question to the LLFA: the ExA asks the LLFA whether this would alleviate their concerns or whether they still require the hydraulic modelling they requested previously. The LLFA reply [REP3-142] that they still require the hydraulic modelling. SLD supports the view of the LLFA that hydraulic modelling for all significant catchments on site to meet the requirements of NPS EN-1 §5.8.15.
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	generated by the site and to provide information regarding the type of SUDS and/or any other drainage features that could be used to drain the site. 2) Provide outline drainage layouts for each site showing potential SUDS connections with existing drainage features and exceedance routing. 3) Include any other information required by NPS EN-1, paragraph 5.8.15, bullet point 11 (i to x). 4) Add all SUDS features to the figures within the Landscape and Ecology Mitigation plans [REP1-029 to REP1-032] and provide an explanation of the	
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	multi-use purpose of each SUDS feature and how they contribute to water management and ecology. <u>The LLFA:</u> The ExA note the LLFA request for further hydraulic modelling in the Council's LIR [REP2-025]. 5) The LLFA is asked to confirm if the information requested by questions 1 to 4 above would address the key sensitivities listed in paragraph 2.21 of [REP1A-017] and negate the need for further modelling in principle. 6) If the answer is negative, the LLFA is asked to explain why not and what further	
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	information is needed considering the need for proportionality. 7) If the answer is affirmative, the LLFA is asked to confirm if this information could be included in the outline management plans secured through the dDCO. If so, the LLFA is asked to explain which management plans and provide the proposed wording changes.	
FHW1.4 The EA The Applicant	Flood Risk Assessment – Flood Zone 3b and Floodplain Impacts. The LLFA considers in Wiltshire Council's LIR [REP1-137] that Flood Zone 3b needs to be defined for effective planning, design and operation of site.	4.1.18. SLD notes that the Applicant confirms the freeboard allowances for electrical equipment at 0.6 m, but also states that "The lowest leading edge of the panel itself is not sensitive electrical equipment and may sit lower, depending on the final fixed or tracker arrangement". This statement has implications for the maximum height of the panels in Flood Zone areas, which would otherwise be the panel height plus the design flood depth plus the freeboard allowance, i.e. 5.1 m in Area D and 5.3 m

	The applicant explains in its D2 submission [REP2-045] and response to the LIR [REP2-038] that detailed hydraulic modelling for the Gauze Brook and the Unnamed river has been undertaken at Lime Down D, and that at Lime Down E2 further hydraulic modelling is being progressed in relation to Gabriel's Well to define local flood behaviour, including Flood Zone 3b where relevant. We understand that the details of the modelling are currently with the Environment Agency (EA) for review. <u>The Environment Agency:</u> 1) The EA is asked to explain if there are any concerns regarding the parameters and outputs of the modelling done	in Area E. It also raises the possibility that floating debris will be caught on the lower edge of the tracking panels during an extreme flood. SLD requests that the Applicant should clarify the position and address these concerns. 4.1.19. In relation to the question about whether SLD's submission in [REP1-176] could support an extension to Flood Zone 3b, the EA responds [REP3-146] that designation of Flood Zone 3b is up to the LLFA and SLD should submit [REP1-176] to the LLFA if we wish it to be considered, which SLD will do. However, the EA also state that the extent of Flood Zone 3b is normally determined by modelling a 3.33% AEP event, and the Applicant is committed to doing this for the two major sites of fluvial flooding in Areas D and E2. [REP1-176] showed that the flooded area during Storm Bert was greater than the modelled functional floodplain, but Storm Bert was a more severe event (approximately 1% AEP). 4.1.20. The EA's concerns about modelling parameters will be discussed under FHW1.5.
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	so far and the modelling being progressed by the applicant for Lime Down D and E2. 2) The EA is asked to explain if the information submitted by SLD, specifically in document [REP1-176] could support an extension to Flood Zone 3b in Lime Down D and if so, to which fields. <u>The Applicant:</u> 3) The applicant is asked to confirm the freeboard allowances requested by the EA in their document [REP2-049]	
FHW1.5 The LLFA The EA	Flood Risk Assessment – Manning Calculations Results	4.1.21. The EA responds to this question [REP3-146] by saying that SLD’s analysis of the Manning’s flows is correct and the Applicant’s flow calculations are an order of magnitude or more greater than they should

The Applicant	Figure 1 (page 10) of SLD's representation [REP1-174] shows the flows calculated using Manning's open channel flow formula. It is in section 'Fluvial Flooding' which discusses in detail the information submitted in the flood risk assessments submitted by the applicant. <u>All Parties:</u> 1) The LLFA, the EA and the applicant are asked to submit a response to the analysis done by SLD and its conclusions. In your response, please set out the implications for the interaction with surface water flood risk and the potential impact to on site and off site flood risk.	be. They confirmed this on the most extreme value by doing their own calculations using their standard modelling approach. 4.1.22. The EA then point out that the small watercourses crossing the site have catchment areas too small to generate a Flood Zone, the limit being 3 km², and thus Flood Zones may not be designated in these areas even though they are at risk. The Applicant proposed to the EA to use the surface water flooding map, known as Risk of Flooding from Surface Water ("RoFSW") instead of the fluvial flooding map in these areas. The EA appears to agree to this, and use the Mannings flow calculations to justify it, saying that they show that the amount of flooding is not very sensitive to rainfall event probability. Professor Skeffington's opinion is that a precaution approach would use a model producing realistic results before drawing such conclusions. 4.1.23. The Applicant however does not agree with SLD's interpretation of the Manning calculations or with the conclusions drawn from Figure 1 of SLD's WR, Appendix F1 [REP1-174], though they do reluctantly accept that the explanation of the process in the FRAs could be clearer.
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	<u>The Applicant:</u> 2) Paragraph 25 of the SLD representation refers to inconsistencies/mistakes between references to the 0.1% Annual Exceedance Probability (AEP) and the 1% AEP events in the flood risk assessments. The applicant is asked to review, confirm and address any inconsistencies in the flood risk assessments.	They proceed to provide an explanation which does not appear at all even in the third revisions of Appendix 11-1 Flood Risk and Drainage Strategy Covering Report [REP3-048] and Appendices 11-2 to 11-8 [REP3-050], [REP3-052], [REP3-054], [REP3-056], [REP3-058], [REP3-060], and [REP3-062], respectively the Flood Risk and Drainage Strategy for Individual Sites, supplied at Deadline 3. The Applicant “started from the Environment Agency’s published flood mapping, including the 0.1% AEP surface water mapping, which was used as a conservative indication of the wider potential flood extent. The Manning calculations were then used to estimate indicative flood levels for the 1% AEP event plus climate change at selected smaller watercourses and drainage features”. The Manning calculations presented should therefore be for the 1% AEP event, but Annex B in each FRA states that it shows values for the 0.1% event. The ambiguity noted by the ExA is thus unresolved. 4.1.24. The Applicant devotes a lot of space to refuting claims which SLD has not in fact made, such as that the Manning’s calculations show that solar panels increase runoff volume or lead to an increase in off-site
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		flooding. Rather than address these in detail, we review below our original criticisms of the Manning's calculations and where they stand after the Applicant's response. Our criticisms were: (a) That the results of the modelling were unrealistic – this view is supported by the Environment Agency; (b) That the descriptions of the process in the main text and Annex B of the FRAs are confusing and contradictory – this is still the case; (c) That it was unclear what, if any, use had been made of the modelling. This is now a little clearer in the Applicant's response though not in the revised FRA documents. (d) How the Applicant had used the modelling results in their assessment that the flood risk was "negligible to low" when the model results showed that extreme rainfall events would produce devastating flooding. This is still unexplained. In [REP1-174] at §26, SLD suggested that: "In terms of the Applicant's Impact Assessment Methodology set out in Chapter 11 of the ES, Tables 11-
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		3 to 11-5, the impact magnitude should be “high”, the sensitivity should be “high” as there are residential properties at risk downstream, and the significance should thus be ‘major’. This is not compatible with a low risk rating.
HW1.1 The Council	Mental Health and Wellbeing The ExA note that in your submission at Procedural Deadline A [PDA-014] there is reference to a good practice Supplementary Planning Document by Suffolk County Council relating to community engagement and wellbeing. Please submit this document into the examination and advise if any discussions have been had with the applicant on producing something similar and securing it within the dDCO.	4.1.25. The Applicant’s response is not satisfactory and, in SLD’s view, fails to meaningfully engage with the SPD referenced in the ExA’s question and the Council’s submission at Procedural Deadline A. It is right that the guidance primarily focusses on pre-submission community engagement – however, the suggestions proposed are obviously <i>also</i> relevant to the post-consent engagement process. SLD does not understand on what basis the Applicant has dismissed the proposals in this document. The SPD is likewise clear that “project promoters have a duty to take effective and robust measures to minimise and mitigate adverse impacts on community wellbeing, during the pre-application, consenting, construction and decommissioning phases of their project.” The SPD is plainly relevant to all stages of the project.

		4.1.26. The SPD observes that communities in Suffolk which are experiencing the impacts of multiple NSIP schemes “feel the project promoters have, in forming and promoting their proposals, overlooked the adverse impact this has on community well being.” Further, “feelings of fear, mistrust, anger and frustration are all reported, along with impacted sleep, and inability to plan for the future, due to the uncertainty created by the proposed development.” Parish councillors, in particular, reported “increased levels of emotional distress, because of the demands of the role they play, in supporting the community to navigate the NSIP process” and also “by technical information that is challenging to understand and interpret, and by the amount of time that needs to be invested in the process.” The SPD demonstrates that community engagement processes in response to NSIP regimes have so far been ineffective. 4.1.27. A robust and detailed communication strategy should be interrogated at this stage, when local communities have the most opportunity to be involved in the process.
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		4.1.28. There are a variety of recommendations within the SPD that SLD consider are reasonable and appropriate for both the pre and post consenting process (and some of these have been done, albeit to too limited an extent). For example: • To establish a panel made up of a group of engaged individuals, who have the confidence of the communities they represent, and who can engage and work with the promoter, without prejudice to any objections they may have to the scheme. • Delivering information regarding the infrastructure programmes to community leaders, supported by face-to-face conversations to ensure that community leaders can ask questions, and get responses, in a timely manner. • To recognise that prior to determination of the Development Consent Order and the appointment of lead contractors, design outcomes will remain provisional. Therefore, development of the detailed designs used for the Discharge of Requirements will need to be finalised, in discussion with the panel, before submission to the discharging Local Authority.
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		• Maintaining proactive, regular, in person contact with communities, via attendance at parish council meetings. Acknowledging the concerns of the community and working with them to develop a supportive and collaborative dialogue. • Project promoters should consider how parish councils will be supported to understand the technical and complex nature of these projects. Support should be provided from the outset of any proposals and should be consistent throughout the process. • Consideration should be given to the employment of an independent third party to act as a “relationship manager” between the developers, local authorities, and the impacted communities, to ensure conversations remain positive and helpful. • Project promoters should invest in the development of community assets, as mitigation and enhancement. The identification of relevant assets should be undertaken in close collaboration with the community, and may include for example, proactively investing in supporting local community events, the enhancement of community buildings such as village halls or places of worship, or public spaces
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		and community organisations, so supporting communities to continue to foster a sense of pride, allyship and belonging. • Consideration should be given to the funding of local mental health organisations, to enable them to mentor those who volunteer to undertake wellbeing support roles. This would ensure that volunteers receive appropriate training, support, and guidance, and would also reduce the feelings of isolation and overwhelm often described by community leaders in these roles. 4.1.29. Additionally, in the appendix to the document, the SPD sets out a variety of key performance indicators for indicators of community engagement and the safeguarding of community wellbeing. SLD considers that these proposals may offer an effective form of monitoring. 4.1.30. It is noted that other NSIPs have proposed mental health support services for residents in compulsory purchase areas, such as for Heathrow's third runway. It is unclear why the Applicant does not propose to replicate such services here.
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HW1.3 The Council The Applicant	Mental Health ES Chapter 18 table 18-7 [APP-070] states that emergency hospital submissions resulting from self-harm in the study area are higher than the UK average. <u>Wiltshire Council:</u> Given the level of public concern and interest generated by the proposed development, the Council is asked to comment on whether the applicant's proposed mitigation of signposting those concerns to existing mental health services is sufficient? <u>The applicant:</u>	4.1.31. The Applicant's response outlines those health services and health bodies which the Applicant has had communications with. It is noted that no responses were recorded by any of the contacted consultees. The Applicant then asserts, "the absence of interaction from service providers indicated to the Applicant that said service providers were not specifically concerned with the Scheme having an impact on their ability to deliver their services to the affected population." 4.1.32. SLD disputes the inference the Applicant has proposed to draw from their silence. Many of the health services contacted are already overstretched and underfunded and may struggle to engage with the DCO consenting process. Their lack of response cannot be inferred as a lack of concern. It is also noted that since September 2024, a significant amount of local interest has been generated in respect of the scheme and it may be their responses would be different now.

	You are asked to detail any discussions you have had with the existing services referenced in ES Chapter 18 that have informed the approach.	
LV1.6 The Council SLD The Applicant	Landscape Character – Assessment Methodology In the ES [APP-060] the applicant has assessed effects to landscape character relative to each study area (1km, 2km, 5km) as a single receptor rather than each of the separate landscape receptors (LCTs, LCAs) that make up each study area. The ExA understands that the intention of this approach is to look at the effects of the proposed development on the holistic patchwork of landscape character within each study area.	4.1.33. The ExA asks whether landscape character areas / types should be included as receptors in the LVIA, which has grouped landscapes by geographical area rather than by landscape character area / type. 4.1.34. SLD's landscape expert's opinion, as expressed in the response to this question in [REP3-173], is that the Applicant's approach is acceptable for the purposes of this exercise, but it could be improved, and would be helpful. 4.1.35. The Applicant's response to the question states that the exercise is not considered necessary, but could be carried out if of assistance to the ExA.

	However, it is not clear to the ExA that this approach captures the impacts on the different landscape receptors and the individual characteristics identified in the relevant landscape character assessments. <u>Wiltshire Council and SLD:</u> Wiltshire Council and SLD are asked if they consider that the applicant's approach is acceptable? <u>The applicant:</u> The applicant is asked to either: 1) Provide further justification for its approach including reference to relevant guidance and precedent from other Nationally Significant Infrastructure Project (NSIP) scale solar projects; or	4.1.36. The reason why the Applicant does not consider the exercise necessary is stated as being because "GLVIA3 does not suggest that an LVIA should consider individual Landscape Character Areas (LCAs) or Landscape Character Types (LCTs) as individual Landscape Receptors, rather that LCAs / LCTs are used to identify the Baseline". 4.1.37. SLD's landscape expert does not agree that GLVIA3 does not suggest this approach. In her opinion, GLVIA3 is clear that the main purpose of the baseline studies is to identify the receptors which could be affected by the development. The Applicant has identified the LCAs / LCTs in the baseline but has decided not to treat them as 'receptors' in the assessment of effects. 4.1.38. GLVIA3 para. 5.2 states that "... The study area should include the site itself and the full extent of the wider landscape around it which the proposed development may influence in a significant manner. This will usually be based on the extent of Landscape Character Areas likely to be significantly affected either directly or indirectly..." (emphasis added).
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	2) Provide an updated assessment defining the effects relative to the separate landscape receptors rather than to each study area as a whole	4.1.39. Para. 5.34 states (with emphasis added), “Once the baseline information about the landscape is available this can be combined with understanding of the details of the proposed change or development that is to be introduced into the landscape to identify and describe the landscape effects. • The first step is to identify the components of the landscape that are likely to be affected by the scheme, often referred to as the landscape receptors, such as overall character and key characteristics, individual elements or features, and specific aesthetic or perceptual aspects.” 4.1.40. Para. 5.44 notes that following the baseline studies, “the value of the Landscape Character Types or Areas that may be affected” should be established (emphasis added). 4.1.41. Para. 5.50 states that “The geographical area over which the landscape effects will be felt must also be considered’, which may be ‘at the scale of the landscape type or character area within which the
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		proposal lies', or 'on a larger scale, influencing several landscape types or character areas ' (emphasis added).
LV1.7 The Applicant	Landscape Character – Local 1km Study Area The applicant is asked to confirm whether the assessment of landscape character effects within the local 1km study area included the land within the boundary of Lime Down A to E? and: 1) If so, the applicant is asked to justify the reduction in the significance of effect at year 15 of operation given the scale of land-use change within the boundary of Lime Down A to E? If not, the applicant is asked to explain why the landscape character effects	4.1.42. The Applicant's response states that "the local 1km study area (and indeed all the study areas) includes the land within the boundary of Lime Down A to E". 4.1.43. However, LVIA §8.5.14 states that "The... Local 1km Study Area... is the 1km area extending as a radius from the outer boundary of Lime Down A to E". 4.1.44. Para. 8.5.13 states that "The Landscape Fabric of the Solar PV Sites is considered a landscape receptor which will be assessed separately to relevant the following Study Areas" ('fabric' is indeed considered separately as a receptor, but not in isolation, it is an integral part of overall character, so it should also considered in that context, or at the least considered in a manner that avoids double counting).



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	within the boundary of Lime Down A to E have not been assessed?	4.1.45. Yet, §8.5.12 states that “The land associated with the Solar PV Sites A-E themselves is defined as the Landscape Fabric... and the local landscape character”, with ‘fabric’ appearing to have been defined as a combination of landscape elements and overall character. 4.1.46. Clarification of the above would be helpful. 4.1.47. The Applicant’s response goes on to say that the reason for the reduction in the overall level of effect that would occur within the local 1km study area is due to maturing screening vegetation. 4.1.48. SLD’s landscape expert does not agree that all adverse effects on character can be mitigated by screening views, as many are non-visual - see Appendix B to SLD’s WR [REP1-170] §§8.5.18 – 8.5.22. Also, note SLD’s comments about over-reliance on vegetation to screen views in the longer term in section 7.5 of Appendix B. 4.1.49. Most importantly, the reduction in the level of effect only applies to indirect landscape effects, which here would occur a) within the parts
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		of the Order Limits where no infrastructure / associated development is proposed, ie excluding the majority of sites A - E, and b) beyond the Order Limits. 4.1.50. The Applicant's response to this question does not state the levels of direct adverse landscape effects which would occur within the developed parts of Lime Down A – E. 4.1.51. This matter is dealt with in SLD's Appendix B at §§8.4.3 – 8.4.7, but in summary, the Applicant's LVIA did not assess the direct effects that would occur on sites A – E, only on the sites' landscape 'fabric', which it concluded would be Moderate Beneficial (significant). SLD's landscape expert considers this approach to be a departure from the Guidance. 4.1.52. However, subsequently, in [PDA-009], the Applicant's response to item ref. SLD-024 states, "It is fully acknowledged that at the Site level, the character of the Site itself (where there is infrastructure) would be Significantly Adversely affected with the land now presenting as a large scale solar scheme, as with the development of any green field Site".
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		4.1.53. At the recent landscape SoCG meeting, SLD's landscape expert asked the Applicant's landscape expert if they could say what the level of the direct effect would be, and the response was that it would be the "highest possible level". In the LVIA method (Appendix 8-1 [APP-187]), Table 8.1.1.14, the highest possible level of effects is Major. SLD's landscape expert agrees with this conclusion.
LV1.9 The Applicant The Council CNLB SLD	Cotswold National Landscape – Setting The parties are asked to define in spatial terms the extent of the area outside of the boundary of the Cotswolds National Landscape (CNL) that is considered to form the setting of the CNL.	4.1.54. The CNLB's response appears to assume, as originally did SLD's landscape expert, that the Applicant considers the setting of the CNL to extend across the whole of Sites Lime Down A, B and C. 4.1.55. However, SLD's landscape expert queried why, in places, the LVIA had also stated that 'parts' of Sites A, B and C are within the setting. 4.1.56. In the response to this question, the Applicant has now confirmed that 'parts' of Sites A, B and C are within the setting, and has produced plans showing the locations of these parts.

		4.1.57. This matter was addressed at ISH2 and is commented upon in the post-hearing submissions above.
LV1.12 CNLB	Cotswold National Landscape – Special Qualities In its RR, the CNLB states [RR-0944] that it considers it likely that construction traffic would have a significant adverse impact upon the tranquillity of the National Landscape (one of its special qualities). Other than disagreeing with the applicant's assessment of the impact on the special quality of tranquillity, do the CNLB agree with the applicant's conclusions on the assessment of effects on the CNL's other special qualities as summarised in table 18 of	4.1.58. The CNLB's response refers to CNL Special Quality 5. "Distinctive dry-stone walls", and states that "the restoration of some short stretches of dry-stone wall within the CNL's setting as part of the proposed embedded mitigation... comprises an indirect, negligible beneficial effect to this special quality". 4.1.59. However, in SLD's landscape expert's opinion, this is an example of landscape / visual mitigation being double-counted as landscape / visual enhancement. 4.1.60. The CNLB's response also refers to CNL Special Quality 6. Flower-rich grasslands.... The CNLB considers this to be "an enhancement associated with the Scheme. Therefore, this comprises an indirect, minor beneficial effect to this special quality".

	the applicant's ES Appendix 8-6 [APP-197]?	4.1.61. However, it appears that in LVIA Table 8-18, flower-rich grasslands are in fact mitigation (assuming this is the same as "diverse wildflower meadow"). 4.1.62. SLD's landscape expert agrees with the CNLB's conclusion with reference to Special Quality 9. that "the Scheme would lead to a direct, major/moderate (significant) adverse effect on the tranquillity of the part of the CNL through which construction traffic is to be routed during the Scheme's construction and decommissioning periods".
LV1.19 The Council SLD	Visual Impact - Residential Visual Amenity Assessment SLD explains in its Landscape and Visual Impact Report [REP1-170] that it disagrees with the applicant's approach that a residential visual amenity assessment (RVAA) is not required and states that the level of effect that would be experienced by receptors at Grain Store Barn does	4.1.63. The Applicant's response states that the RVAA concludes that the high levels of adverse visual effects that would be experienced by receptors at Grain Store Barn (which is likely to be the residential property where levels of effects would be highest) would still not trigger the requirement for a 'full' RVAA. 4.1.64. SLD's landscape expert agrees it is unlikely that the Applicant's RVAA would conclude that a 'full' RVAA would be required for Grain Store Barn, and considers it unlikely that this would be required for any of the

	cross the threshold for 'full' RVAA. SLD also states that may also be the case for other residential receptors. <u>Wiltshire Council:</u> 1) Do Wiltshire Council agree with the applicant's approach that a RVAA is not required? If it does not, provide reasoning and identify the residential receptors that you consider should be scoped into a RVAA and why? <u>Stop Lime Down:</u> 2) SLD are asked to identify any other receptors they consider should be subject to a full RVAA.	residential properties adjacent to / in proximity to the Scheme. See also the ISH3 submission above.
LV1.20 The Applicant	Visual Impact – Sequential Views The applicant's assessment of sequential effects in the ES [APP-060]	4.1.65. The Applicant's response states that "The visual effects on individual Bridleways has been fully assessed in the LVIA and considers the more elevated views experienced by horse riders".

	only identified recreational walking routes for assessment. The applicant is asked: 1) To provide an assessment of the sequential effects on the Wiltshire Cycleway. 2) To comment on whether cyclists may be differently susceptible to sequential visual effects due to the speed and therefore reduced time between views of different parts of the proposed development. 3) Whether the applicant has identified the commonly used routes for horse riders and considered the sequential visual effects on these routes taking into account the more elevated position of a person on horseback	4.1.66. SLD's landscape expert cannot find in the LVIA any evidence that "the more elevated views experienced by horse riders" have been considered, and it would be helpful to know exactly how and where this was factored in. For example, the Applicant's Zone of Theoretical Visibility (ZTV) plans (see for example [APP-097] Figure 8-8) are based on observer height of 1.7m, so eye-level c. 1.6m, whereas the average eye-level of an equestrian is c. 2.4m.
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LV1.28 The Applicant SLD	Glint and Glare – Stop Lime Down Assessment SLD provided a Glint and Glare Assessment at D1 [REP1-178]. The applicant is asked to consider the conclusions and recommendations set out in SLD's assessment, and in the forthcoming SoCG between the parties, the applicant and SLD are asked to set out where agreement can be found in relation to the assessment methodology, including but not necessarily limited to: • The model output data.	4.1.67. See the Glint and Glare section above which discusses key outputs from the meeting between the Applicant and SLD. SLD will continue to engage with the Applicant on these matters, and considers important considerations remain to be explored in respect of the Glint and Glare assessment and the guidance adopted by Pager Power.
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	• The assessment of impact on local roads. • Impact significance definition. • How the cumulative footprint of the proposed development is assessed, including in relation to Badminton and Bowldown Farm Airfields. • The assessment of train driver safety.	
NV1.3 The Applicant	132 kV Substation Operation Paragraph 14.4.20 of ES Chapter 14 [REP1-021] states that the 132kV substations are only to be operational during the daytime. Can the applicant explain why this is the case and whether any controls are required or in place to regulate this?	4.1.68. It is noted that in noise assessment terms night time is typically described as 23:00 to 07:00. SLD invite the Applicant to specify the hours which have been assessed as “daytime” or “daylight” for the purposes of the noise assessment.
NV1.5 The Council	BS 4142:2014 and Operational Noise Effects	4.1.69. In respect of the Council’s comments that “Background sound levels during the daytime did not fall below 30dB _{LA90} at any noise-sensitive receptor”, SLD points to its WR at Appendix H [REP1-179]



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	Paragraph 14.6.33 of ES Chapter 14 [REP1-021] states that 'where background levels are low, the absolute levels might suggest a more acceptable outcome than would otherwise be suggested by the difference between the values (existing and proposed noise rating levels). As such, where background noise levels are identified as being below the 'very low' threshold of 30dB, a background noise level of 30dB L_{A90} has been adopted with respect to the setting of operational noise LOAEL and SOAEL.' The ExA note in row 3 of Table 14-2 of ES Chapter 14, that the Council confirmed the use of 30dB as a minimum background noise level to be	where such figures for LT12 are identified. It is also noted that the Applicant's approach to background measurement, including the locations chosen, mean the most tranquil locations may have been missed. SLD refers back to its Appendix H.
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	appropriate at the scoping stage. However, SLD's expert's submission at D1 [REP1-179] casts considerable doubt on the appropriateness of this methodology and the applicant's justification for it. SLD's expert states (amongst other things) that the applicant's methodology ignores the context of a very quiet rural area and adopts a "one size fits all approach", which artificially elevates the baseline and thus minimises the noise effects of the development on sensitive receptors. It also provides examples of this in action for several residential receptors (Townleaze Farm and Bradfield Manor). The Council is requested to review SLD's submission [REP1-179] and	
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	advise the ExA whether it still agrees with the applicant's justification for using an absolute background noise level of 30dB, or if (and why) it now agrees with SLD's concerns that raising the baseline in this way modifies the relevant thresholds for the LOAEL and the SOAEL and thus underplays the noise effects.	
NV1.6 The Applicant	Operational Noise Results Summary Table 14-23 of ES Chapter 14 [REP1-021] presents the operational noise results summary. It records zero receptors above SOAEL during the day and night-time periods. However, Table 9 of ES Appendix 14-4 [REP1-061] reports Receptors R10 (Bradfield Farm) and R20 (Townleaze Farm)	4.1.70. Without repeating all of SLD's submissions, it is noted that the Applicant only undertakes to avoid SOAEL effects in the final design. SLD again have concerns that this does not demonstrate proper compliance with the NPSE and the obligation to mitigate LOAEL effects. Mitigation measures should be considered and assessed so that the ExA can be satisfied of the avoidance and mitigation now.

	experiencing a SOAEL at night-time. The applicant is required to review this discrepancy along with the statement made in paragraph 14.10.51 of ES Chapter 14, which states these receptors experience adverse effects between LOAEL and SOAEL during the night-time. If on review, the operational noise at the aforementioned receptors would be above or equal to SOAEL, the ExA requires an additional analysis setting out proposed mitigation to reduce the noise impact (this is without prejudice to the methodology positions raised in ExQ1 NV1.5 above).	
NV1.7 The Applicant	Receptors R10 and R20 The applicant is required to explain the statement made in paragraph	4.1.71. It is noted that, even in the Applicant's own assessment, the 35 dB $L_{A,T}$ is described "at the higher end of what may be termed low". It is clear that the Applicant itself recognises it is taking the most favourable

	14.10.52 of ES Chapter 14 [REP1-021] that the night-time rating level at Receptors R10 and R20 can be defined as being a low rating level, particularly in light of paragraph 14.6.31 which states that 'BS 4142 does not define 'low' in the context of background sound levels nor rating levels. The note to the Scope of the 1997 version of BS 4142 defined very low background sound levels as being less than about 30 dB LA90, and low rating levels as being less than about 35 dB L_{Ar,Tr}.' (Bold text is ExA's emphasis).	interpretation it can adopt to reach this conclusion. SLD does not agree with that interpretation in any event.
NV1.9 The Applicant	Receptors Table 14-11 of ES Chapter 14 [REP1-021] defines the types of receptors that sit within high, medium and low	4.1.72. Without repeating all of SLD's submissions on noise on PRowWs, it is noted that the Applicant aligns the noise that will be experienced to "range from imperceptible to the level of regular conversation (50-60 dB)". SLD consider being in that range means that the electrical noise of

	noise sensitivity categories. The applicant states it has used ISEP Guidelines for Environmental Noise Impact Assessment (2014) to define potentially affected receptors and their sensitivity level; however, the ISEP Guidelines includes farms, open air amenities (for example public rights of way and areas of landscape value) and wildlife sites and fauna as possible receptors that may need to be considered. Such receptors are notably absent from the applicant's Table 14-11 and the noise and vibration assessment generally. NPS-EN-1 recognises at paragraph 5.11.30 that 'Public Rights of Way, National Trails, and other rights of access to land are important	the Scheme will have the propensity to also interrupt such regular conversation on a PRow, significantly interrupting enjoyment and dissuading use.
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	recreational facilities for example for walkers, cyclists and horse riders. The Secretary of State should expect applicants to take appropriate mitigation measures to address adverse effects...' Similarly, NPS EN-3 at paragraph 2.10.42 provides that applicants 'are encouraged to design the layout and appearance of the site to ensure continued recreational use of public rights of way where possible during construction, and in particular during operation of the site.' The applicant is required to rectify the deficiencies noted above in the applicant's noise and vibration assessments with regard to potential effects on walkers, cyclists and horse riders within close proximity to the	
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	Order limits and the construction traffic routes. Whilst the ExA acknowledge that the use of PRow or roads by those receptors may be linear and transient, we note that plant noise hum is expected to be permanent and continuous throughout the 60 year operational period, such that it could reduce the use, tranquillity and enjoyment of the area. As such, the ExA expects the noise effects of the proposed development on those receptors to be appropriately considered by the applicant or robustly justified in its absence.	
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5. Conclusion

5.1.1. This submission has summarised the submissions made at the hearings taking place 30 June 2026 – 3 July 2026 and commented upon the documents submitted by the Applicant and other parties at Deadline 3.

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 development consent should not be granted for the Scheme.



6. Appendixes

6.1. Appendix A: HGV Trip Generation Report

Revised Construction Trip Generation Calculation

Mr. Bruce Bamber – Railton TPC Ltd

1. This paper is produced following the discussion at ISH3 on 2 July 2026, and Action Point 6 in [EV9-010].
2. **Table 2** below summarises the assumptions that have been made to derive a revised estimate of HGV movements associated with the PV sites.
3. Where possible, reasonable worst case assumptions have been applied. Where no significant evidence to the contrary is available, the Applicant's assumptions as set out in the Scheme Description and other sources have been adopted. In some cases, where there is greater uncertainty, a more conservative estimate is made that leads to a lower level of HGV trip generation that might otherwise be adopted. Although a departure from the reasonable worst case approach, it is deemed reasonable to err on the side of caution. In the cases of landscaping and the cable route corridor, the Applicant's estimates of vehicle movements have been used given the current absence of reliable evidence of alternative outcomes.
4. **Table 2** accompanies the summary spreadsheet calculation and two link flow diagrams; the first link flow diagram shows changes in light and vehicle flows on key links and the second shows the % changes in daily HGV flows when the 'average + 50%' approach is applied to account for day-to-day variations in trip generation. The flow diagrams include cable route HGVs allowing for the fact that only 4 cable route access points are expected to be operational at any one time.
5. The results of the revised calculations are summarised in the following table:

Table 1: Summary of Revised Trip Generation Calculations

Quantity	Applicant's Calculation	Revised Calculation	% Difference
Total HGV movements (PV sites)	26,086	47,501	+82%
Total HGV movements (cable route corridor)	20,160	20,160	0% (Applicant's estimate used)

Note: The figures do not include a 50% uplift

Table 2: Construction HGV Trip Generation: Revised Assumptions (Solar PV Sites)

Item	Allowance in Revised Trip Generation Calculation	Notes
Number of solar panels	927,213 panels	The Applicant's stated area of panels (469 ha) has been assumed and a panel density of 1,977 panels /ha. The panel density is derived from the EN-3 para. 2.10.17 that states that a typical solar farm comprising 100,000 to 150,000 panels would cover between 125 acres (50.6 ha) and 200 acres (80.9 ha). The higher resulting density (100,000 panels/50.6 ha) has been used. The use the figures of 150,000 panels on an area of 80.9 ha

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		would lead to a slightly lower density of 1,854 panels /ha. Case basis: REASONABLE WORST CASE
Number of panels per HGV	500 panels	The Applicant suggests that 720 panels could be transported in a single load in a 'high cube' container. A high cube container is one foot (30cm) higher than a standard container. This would increase its volume by around 12% (a high cube has a height of 2.9m and a standard container has a height of 2.6m). It is not, therefore, clear how this would lead to an increase in capacity of 44% (i.e. from 500 panels to 720 panels). Notwithstanding this discrepancy, a likely worst case would be to assume that the smaller load size would be used. Case basis: REASONABLE WORST CASE
Mounting structures	73% of panel HGVs	The Applicant suggests that the number of HGVs required to transport mounting structures would constitute 43% of the number required to transport solar panels. The average ratio for Botley West, Green Hill and Heckington Fen (see Table 3 of Appendix D to SLD's WR [REP1-172]) where all relevant information is available shows an average of 73% of panel HGV numbers. Case basis: CONSERVATIVE ESTIMATE (on the basis of assumptions adopted for other schemes)
Note on solar panel and mounting structure HGV trip generation		This approach to calculating the number of HGVs associated with panels and mounting structures leads to an average of 4.7 HGVs /ha of Works No. 1. This is the same as the average for Green Hill, Cottam and West Burton as calculated by the applicant (4.7 HGVs /ha). The averages are set out in Appendix D to SLD's WR [REP1-172] at Table 2.
Concrete footings	3.4% of mounting structures	The Applicant advises that 16.03 ha (3.4% of the 469 ha of panel area) is potentially archaeologically sensitive. The Applicant has suggested that each footing could be held down with ten 17kg blocks. This is not considered to be a realistic approach and is not consistent with most other non-intrusive support systems that rely on much more substantial footings. It has been assumed that one concrete sleeper (4.0m x 0.3m x 0.3m) would be required per 6 panels. The number of standard mounting structures is reduced accordingly.

		Case basis: REASONABLE WORST CASE
Waste (packaging)	186 HGVs	The Applicant's Deadline 3 Response to SLD's WR [REP3-133] states at para. 2.1.10 that compactors would be located "within each parcel". It is stated that tippers would be able to remove 11.1 tonne loads of compacted waste or 20m³ of compacted waste. The Applicant identifies 1,474,017kg of solar panel packaging and 589,607 of mounting structure packaging (Annex E of Transport Assessment [REP3-066]) Case basis: CONSERVATIVE ESTIMATE (Applicant's estimate assuming compactors)
General access tracks	3,721 HGVs	The Applicant identifies the need for 28.1km of general access track with a width of 3.5m widening to 6.0m at passing places. The track would also need to be widened on bends. A 5% widening allowance has been assumed. The Applicant assumes tracks would be constructed with 0.3m of compacted aggregate. No allowance has been made for the removal of tracks after construction. Case basis: REASONABLE WORST CASE (assuming that no tracks would be removed after construction)
Substation/ BESS access tracks	1,872 HGVs	The Applicant identifies the need for 3.8km of a higher standard of access track that would accommodate AIL and larger vehicles accessing the substations and the BESS; 6.0m wide increasing to 8.0m at passing places, widening at bends with a construction depth of 0.65m (see Appendix 3-3 [APP-184]). A 5% widening allowance has been assumed. No allowance has been made for the removal of tracks after construction. Case basis: REASONABLE WORST CASE (assuming that no tracks would be removed after construction)
Compound surfacing	108 HGVs per compound (similar removal)	The Applicant makes no separate assessment of the HGV movements associated with compound construction and removal. It has been assumed that each compound will be 50m x 60m (slightly larger than the 50m x 50m that has been suggested as the minimum size by the Applicant – see Plate 2-1 of Applicant's Response to SLD's WR [REP3-133]) with a 0.3m depth of aggregate. The surface needs to be of sufficient strength to support heavy vehicles and equipment passing over and turning. The surfacing would be removed after construction. Case basis: REASONABLE WORST CASE

Compound s (other)	100 HGVs		Other structures that will be associated with compounds include office, welfare, water tank, fuel tank, fencing, security, compactor, generator and skips. Regular HGV movements would be associated with water and fuel delivery, waste removal (foul water, chemicals solvents and oils) and the transport and movement of equipment and machinery. An allowance of 100 HGVs per compound over the whole of construction period is assumed. Case basis: CONSERVATIVE ESTIMATE
Spoil	10% excavated material transported site	of off	The volume of excavated material is derived directly from the volumes of material used for access roads, compounds, foundations of substations and the BESS. This amounts to 122,699m³. The Applicant's estimate is that 139,666m³ of soil would be excavated and that 10% of this would be taken off site. The Applicant has suggested that excavated material, if from access tracks, could be stored adjacent to tracks and that spoil could be used in bunds around the site. An initial assessment of the possible volume of the bund around the BESS, shown in the illustrative plan [REP3-041], suggests that it would only accommodate around 12% of the total excavated material. If larger amounts of spoil were to be used around the BESS and 400 kV substation (although the latter is not shown on the illustrative plan [REP3-041]) it is possible that material would need to be imported from other areas, thus generating HGV movements on the local highway network. Alternatively, if excavated material from the construction of large structures in Area D exceeds the capacity of the area to accommodate excess material, off-site HGV movements would again be generated. This uncertainty and the lack of any detailed strategy suggests that the estimate of 10% of spoil removed from site is not a reasonable worst case but a conservative estimate. Case basis: CONSERVATIVE ESTIMATE
33kV conversion units	332 HGVs		The Applicant appears to have allowed for 68 HGV deliveries associated with 'skids'. It is suggested that there would be 166 conversion units (ES, para. 7.10.21 [APP-059]). Each unit could either be a single integrated unit (see Plate 3-7 of Chapter 3 of the ES [APP-055]) or standalone equipment (Plate 3-8 [APP-055]). A best case would be one HGV delivery per conversion unit. A likely worst case could be 2 HGVs per conversion unit. Case basis: REASONABLE WORST CASE

Conversion unit foundations	1,129 HGVs	Each conversion unit would sit on a concrete slab and a levelling layer of aggregate (ES para. 3.3.23 [APP-055]). It has been assumed that each unit would site on a 6.0m x 16.0m slab and the total depth of foundations would be 0.4m split between concrete and a levelling layer of aggregate. The relative proportions of concrete and aggregate may alter but the total depth of construction is a reasonable worst and the proportional split between concrete and aggregate has only a minimal impact on overall HGV generation. Case basis: REASONABLE WORST CASE
132 kV substations	359 HGVs per 132 kV substation	The indicative size of the 132 kV substations is 3,455m² (see Applicant Response to SLD's WR [REP3-133], para. 3.5.5). Given the need to support heavy components and equipment, it is assumed that the average thickness of concrete over this area would be 0.5m. There would be a need for numerous other components that the applicant has made no allowance for (security fencing, electrical and structural infrastructure, control room, lighting, security). Assume an additional 100 deliveries associated with these items. Case basis: CONSERVATIVE ESTIMATE
400kV substation foundations	3,959 HGVs	The indicative size of the 132 kV substations is 38,037m² (see Applicant Response to SLD's WR [REP3-133], para. 3.5.5). The foundations are required to support very heavy components and the equipment that handles them. It is assumed that an average of 0.8m thickness of concrete is used over 75% of the site and 0.3m of gravel is used over the remaining 25%. Case basis: CONSERVATIVE ESTIMATE
400kV substation compound	0	The Applicant has not identified a construction compound for the substation. It has been assumed (see below) that there would need to be a compound for the BESS and it may be possible for the area to be used for both the BESS and 400kV substation construction. Only one additional compound has therefore been allowed for. Case basis: CONSERVATIVE ESTIMATE
400kV substation other	250	An allowance needs to be made for other electrical and structural components, control building, security fencing, lighting, security and the movements of equipment and machinery.

		Case basis: CONSERVATIVE ESTIMATE
BESS Units	540 HGVs	The Applicant recognises that each BESS unit would be too large to be transported by a single standard HGV so there will need to be 2 deliveries associated with each BESS unit. Case basis: REASONABLE WORST CASE
BESS Power Conversion System (PCS) units	90 HGVs	Appendix 3-1 to the ES [REP3-041] shows the proposed layout of the BESS. This includes 45 PCS units comprising 90 inverters and 45 medium voltage transformers (Appendix 3-1, para. 1.2.1 [REP3-041]). The Applicant has made no allowance for these components. It is assumed that two inverters could be transported with a single HGV and that one inverter could be carried by a single HGV. Case basis: REASONABLE WORST CASE
BESS foundations	3,236 HGVs	The indicative size of the BESS area is 27,096m² (see Applicant Response to SLD's WR [REP3-133], para. 3.5.5). BESS foundations (BESS units and PCS units) are expected to be concrete piles up to 12m in depth (see revised Scheme Description [REP2-016]). Both BESS and PCS units would sit on concrete platforms that would be supported on concrete piles. Assume an average depth of concrete for BESS and PCS foundations of 0.8m. The need to contain fire water from the entire BESS area will necessitate the provision of a further impermeable concrete structure, likely to be filled with gravel. Assume 0.3m depth of concrete and 0.5m of gravel over areas not occupied by BESS and PCS platforms. Case basis: CONSERVATIVE ESTIMATE
Other BESS components	100	The Applicant makes no allowance for the BESS control room, the minimum of two fire water tanks, security fencing, equipment and machinery. Assume 100 deliveries. Case basis: CONSERVATIVE ESTIMATE
BESS compound	316	The Applicant has made no allowance for a compound serving the BESS. Assume the number of HGV movements would be the same as for the solar array compounds (see above). It is likely that the BESS compound would be operational for up to 2 years. Case basis: REASONABLE WORST CASE

Cable	50 HGVs	The Applicant has allowed for 50 deliveries associated with cable associated with the solar array areas. Case basis: CONSERVATIVE ESTIMATE
Landscaping	489 HGVs	The Applicant identifies 489 HGVs associated with landscaping. Case basis: APPLICANT'S ESTIMATE
General	0	The Applicant identifies 2,685 HGVs associated with compounds, spoil removal and landscaping. These items are dealt with individually above so no additional allowance is made. Case basis: CONSERVATIVE ESTIMATE
Highway improvements and site accesses	0	The Applicant states that these would be constructed before the main scheme construction period. Case basis: CONSERVATIVE ESTIMATE
Drainage infrastructure	0	Site access roads and all hardstanding would require drainage and some of this would require structures (SUDS, pipes, tanks/containment). Some allowance has been made in relation to the BESS elsewhere, but no allowance has been made for other structures. Case basis: CONSERVATIVE ESTIMATE
Cable route corridor		The Transport Assessment [REP3-065] states that each cable route access point would attract 4 HGV deliveries (8 movements), 4 LGV deliveries (8 movements) and 10 staff, all of whom are assumed to drive (20 movements). There are 28 cable route access points each operational for 90 days. This leads to a total of 20,160 HGV movements (28 accesses x 90 days x 8 HGV movements) and 70,560 light vehicle movements (28 accesses x 90 days x 8 LGV movements plus 28 accesses x 90 days x 20 car movements). At any one time, 4 access points are expected to be operating (4/28 of total). This gives an average of 32 HGV movements on a single day (4/28 x 20,160 HGV movements/90 days) and 48 HGV movements when a 50% uplift is applied to account for day to day variation. Similar calculations yield an average of 32 light vehicle movements on a single day and 48 with a 50% uplift. Car trips on an average day would be 80 (4/28 x 50,400 car movements/90 days) and 120 car movements with a

		50% uplift. No additional allowance is made for AIL deliveries. Case basis: APPLICANT'S ESTIMATE
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Assessment of Construction Traffic Movements (Solar PV Areas only)

1. PV Modules

	A	B	C	D	E	tot
Works No. 1 Area	94	70	241	212	131	748
% of total	12.6%	9.4%	32.2%	28.3%	17.5%	100.0%
Area containing panels (ha)	59	44	151	133	82	469
Number of panels	116,521	86,771	298,741	262,793	162,386	927,213
Number of HGV deliveries	233	174	597	526	325	1,854

2. Mounting Structures

	A	B	C	D	E	tot
Panels supported by concrete footings	3,962	2,950	10,157	8,935	5,521	31,525
Number of concrete footings	660	492	1,693	1,489	920	5,254
HGV deliveries (concrete footings)	36	27	91	80	50	284
Panels supported by piles	112,560	83,821	288,584	253,858	156,865	895,688
HGVs	170	127	436	384	237	1,354

3. Waste (packaging)

	A	B	C	D	E	tot
Tonnes of packaging	259	193	665	585	361	2,064
HGVs	23	17	60	53	33	186

4. Access Tracks

	width (m)	depth (m)	compaction	vol/km (m³)	mass/km (t)	tippers/km
solar PV access track	3.5	0.3	1.2	1,323	2,646	132
substation/BESS access track	6.0	0.65	1.2	4,914	9,828	491
solar PV access track (km)	3.5	2.6	9.1	8.0	4.9	28.1
removal of PV access track	0.00	0.00	0.00	0.00	0.00	0.0
tipper truck deliveries/removals	468	348	1,199	1,055	652	3,721
SS/BESS access track (km)	0.5	0.4	1.2	1.1	0.7	3.8
removal of SS/BESS track (km)	0.00	0.00	0.00	0.00	0.00	0.0
tipper truck deliveries/removals	235	175	603	531	328	1,872

5. Compounds

compounds	width (m)	length (m)	depth (m)	compaction	HGVs	
surfacing per compound	50	60	0.3	1.2	108	
removal of surfacing per compound	50	60	0	1	108	
other deliveries					100	
Total HGVs per compound					316	
	A	B	C	D	E	tot
number of compounds	1	1	2	4	2	10
HGV deliveries	316	316	632	1264	632	3,160

6. Removal of Spoil

	A	B	C	D	E	tot
volume from access tracks (m³)	4,676	3,482	11,988	10,546	6,516	37,208
volume from BESS/SS access tracks (m³)	2,353	1,752	6,032	5,306	3,279	18,722
volume from compounds (m³)	900	900	1,800	3,600	1,800	9,000
volume from conversion units (m³)	801	597	2,054	1,807	1,116	6,374
volume from substations (m³)	1,728	0	1,728	1,728	1,728	6,910
volume from 400kV SS (m³)	-	-	-	25,675	-	25,675
volume from BESS (gravel and concrete) (m³)	-	-	-	18,809	-	18,809
Total volume (m³)	10,457	6,731	23,602	67,470	14,439	122,699
% off site	10%	10%	10%	10%	10%	
HGVs	78	50	177	506	108	920

7. 33kV Conversion Units (skids/power stations)

	width (m)	length (m)	area (m²)	depth (m)	HGVs/unit	
foundations (concrete)	6.0	16.0	96	0.2	3	
foundations (aggregate)	6.0	16.0	96	0.2	2	
total foundations				total	5	
	A	B	C	D	E	tot
number of units per Area	21	16	53	47	29	166
transport of conversion units (HGVs)	42	31	107	94	58	332
HGVs for foundations	100	75	257	226	140	797
Total HGVs	142	106	364	320	198	1,129

8. 132 kV Substations

	width (m)	length (m)	area (m²)	depth (m)	HGVs	
foundations per substation	59	59	3,455	0.5	259	
other deliveries per substation					100	
				total	359	
	A	B	C	D	E	tot
number of 132kV SS per Area	1	0	1	1	1	4
HGVs	359	0	359	359	359	1,437

9. 400 kV Substation

	width (m)	length (m)	area (m²)	depth (m)	volume (m³)	HGVs
concrete	195	195	38,037	0.8	22,822	3,423
aggregate			28,528	0.3	2,853	285
equipment/machinery, piles, cabling, infrastructure, control building, fencing, security etc.			9,509	0.3	4,302	645
Total for substation						3,959

10. BESS

	270 BESS units					540
	45 Power conversion system units (PCSs)					90
						2 HGV/BESS unit
						2 HGV/PCS
		</				

11. Cable (for PV sites)

information from Annex E of TA	6	5	16	14	9	50
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8. Landscaping

	A	B	C	D	E	tot
	61	46	158	139	86	489

11. Highway Improvements

	A	B	C	D	E	tot
number of accesses	2	3	6	7	9	27
HGVs	0	0	0	0	0	0
highway improvement areas	0	0	0	0	0	0
HGVs	0	0	0	0	0	0

12. Drainage Infrastructure

	A	B	C	D	E	tot
	0	0	0	0	0	0

red: inputs

General assumptions

- 2.0 aggregate density (t/m³)
- 3.0 concrete density (t/m³)
- 20.0 tonnes of aggregate per HGV
- 20.0 tonnes of concrete per HGV
- 11.1 tonnes of compacted waste per HGV
- 4.0 length of concrete footing
- 0.3 width of concrete footing
- 0.3 height of concrete footing
- 20.0 tonnes of concrete footings per HGV
- 1.5 topsoil density (t/m³)
- 20.0 tonnes of topsoil per HGV

469 ha

1,977 panels /ha

500 panels /HGV

3.4% of total panels

6 panels/footing

73.0% of panel deliveries

2,064 tonnes of packaging

5% widening allowance

5% widening allowance

28.1 km of general access track

0% % of access track removed

3.8 km of BESS/SS access track

0%

100% % of compound removed

2 HGV per conversion unit

75% of area concrete foundations

25% of area aggregate

Total HGV (PV Sites)

	BESS + SS						
	A	B	C	D	E	tot	% higher than TA
Total HGV deliveries	2,128	1,390	4,692	12,524	3,015	23,750	
Total HGV movements	4,256	2,780	9,385	25,049	6,030	47,501	26,086 82%
number of days	198	198	374	462	308		
average daily movements	21	14	25	54	20	134	
Average + 50%	32	21	38	81	29	202	
% of total	16.0%	10.4%	18.7%	40.3%	14.6%	100.0%	

Light Vehicle Movements (PV Sites)

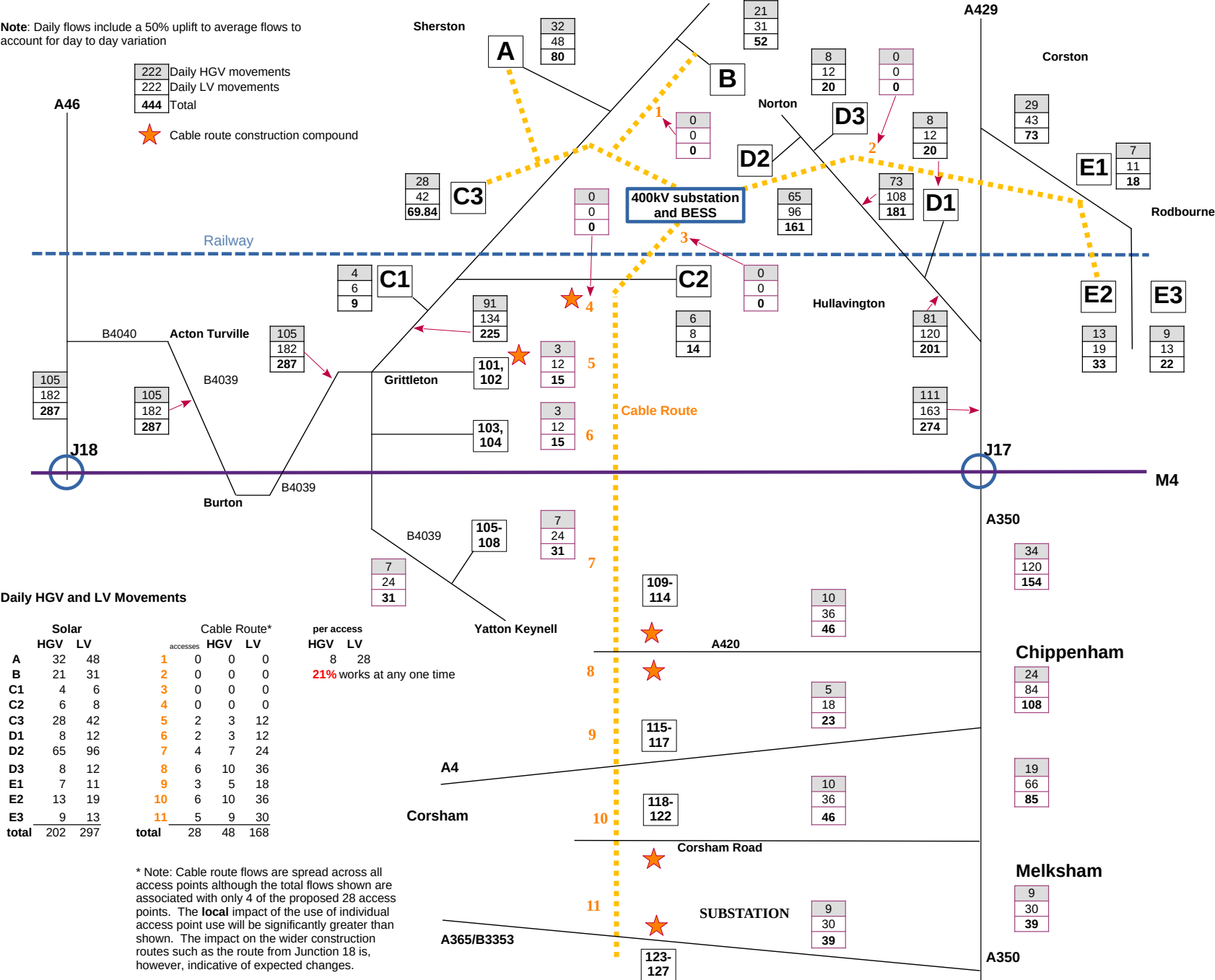
construction workers	99	65	116	251	91	622	622 total staff within PV areas
number using shuttle buses	50	32	58	125	45	311	50% by shuttle bus
number of cars (1 way)	33	22	39	84	30	207	1.5 per car
number of shuttle buses (2-way)	3	2	4	8	3	21	15 per shuttle bus
number of cars per day (2-way)	44	29	52	111	40	276	
total LV movements per day	48	31	55	120	43	297	

Cable Route Corridor

Number of accesses	28						
Days operating	90						
Total HGVs	10,080	4 per access per day					Total HGV movements including cable route
Total HGV movements	20,160					67,661	
Average HGV movements on a single day	32	4 accesses open at any one time					
With 50% uplift to represent day to day variation	48						
Total LGVs	10,080	4 per access per day					
Total HGV movements	20,160						
Average HGV movements on a single day	32	4 accesses open at any one time					
With 50% uplift to represent day to day variation	48						
cable route staff per access point	10						
car trips per day per access point	20	100.0% single occupancy car driver mode share					
total car trips	50,400						
Average total car trips on single	80						
With 50% uplift to represent day to day variation	120						
Total light vehicle movements	70,560						
Total daily LGVs and cars (50% uplift)	168						

Lime Down: Daily Generated HGV and LV Movements (Revised Calcs)

Note: Daily flows include a 50% uplift to average flows to account for day to day variation



Note: Daily flows include a 50% uplift to average flows to account for day to day variation

222	Construction HGV movements
222	Existing HGV movements
100%	% change

1.04 2024-2028 growth



Solar	HGV	Cable Route*	
		accesses	HGV
A	32	1	0
B	21	2	0
C1	6	3	0
C2	4	4	0
C3	28	5	2
D1	8	6	2
D2	65	7	4
D3	8	8	6
E1	7	9	3
E2	13	10	6
E3	9	11	5
total	202	total	28

* Note: Cable route flows are spread across all access points although the total flows shown are associated with only 4 of the proposed 28 access points. The **local** impact of the use of individual access point use will be significantly greater than shown. The impact on the wider construction routes such as the route from Junction 18 is, however, indicative of expected changes.



Stop Lime Down Deadline 4

6.2. Appendix B: UKHSA and Accuweather records

News story

UKHSA updates heat health alerts across England

The existing yellow heat-health alert for the East Midlands, West Midlands, East of England, London, South East and South West will be escalated to amber

From: **UK Health Security Agency** (</government/organisations/uk-health-security-agency>)

Published 22 May 2026

Last updated 6 July 2026 —



Latest update

The UK Health Security Agency (UKHSA) has issued updated heat-health alerts (HHA) for all regions in England, warning that rising temperatures this week may increase health risks, particularly for vulnerable groups.

The existing yellow heat-health alert for the East Midlands, West Midlands, East of England, London, South East and South West will be escalated to

amber and will be in place from 9am on Wednesday 8 July until 9pm on Sunday 12 July. The yellow heat-health alert will remain in place until then.

A yellow heat-health alert has also been issued for the North West, North East and Yorkshire and the Humber and will be in place for the same time period, from 9am on Wednesday 8 July until 9pm on Sunday 12 July.

, Head of Extreme Events and Health Protection at UKHSA, said:

“Sustained periods of warm weather can result in serious negative health outcomes across the population, so it is important that everyone takes sensible precautions while enjoying the sun. Based on the current forecast, we don’t currently expect the health impacts to be as high as the heatwave we saw at the end of June but older adults and those with pre-existing conditions are still at risk.

“If you have friends, family, or neighbours who are more vulnerable, it is important to check in on them and ensure they are aware of the forecast and are following the necessary advice.

“Simple steps such as staying hydrated, avoiding the sun during the hottest part of the day, and keeping your home cool are effective ways to help keep yourself and others safe during periods of hot weather.”

UKHSA will continue to monitor and update alerts if necessary.

Previous updates

26 June

The UK Health Security Agency (UKHSA) has de-escalated its ongoing heat health alert for the South West, South East, London, East of England, West Midlands and East Midlands regions from red to amber. The duration of the alert has been extended until 9am on Sunday 28 June.

The amber heat health alert currently in place for the North East, North West and Yorkshire and the Humber regions has also been extended. An amber heat health alert will now be in place for all regions of England from 9pm on Friday 26 June until 9am on Sunday 28 June.

Previous updates

24 June

The UK Health Security Agency (UKHSA) has extended the current heat-health alerts until 11pm on Friday 26 June.

The red heat-health alert will now be in place for the South West, South East, London, East of England, West Midlands and East Midlands from 1am on Wednesday 24 June until 11pm on Friday 26 June.

All other regions of England remain under an amber alert for the same period.

22 June

The UK Health Security Agency (UKHSA) has issued a red heat-health alert (HHA) for 6 regions of England. The West Midlands, East Midlands, South East, South West, London, and East of England will be under a red heat-health alert from 1am on Wednesday 24 June until 11pm on Thursday 25 June.

In addition, an amber alert has been issued for the North West, North East, and Yorkshire and the Humber for the same period.

This is the second time a red HHA has been issued, the first having been issued in July 2022.

A red heat-health alert indicates that a severe heatwave could have impacts beyond health and social care with potential effects on transport systems, food, water, energy supplies and businesses, and indicates a risk to life for even the healthy population.

UKHSA will continue to work closely with the Met Office, the NHS and other government departments to assess the impacts of this hot weather.

Dr Agostinho Sousa, Head of Extreme Events and Health Protection at UKHSA said:

“Very hot weather is forecast across large parts of England in the coming days and we are urging health and social care services across the country to ensure they are prepared. It is vitally important that people understand the risk posed by high temperatures like these, and take steps to keep themselves and their friends, families and neighbours safe.

“A red heat health alert indicates a risk to life for even the healthy population, but simple actions like staying hydrated, avoiding the sun during the hottest part of the day, and keeping your home cool can make a big difference. It’s also important to look out for others, especially elderly relatives, neighbours, and those with underlying health

conditions, to make sure they are aware of the forecast and following the necessary advice.”

UKHSA guidance on staying safe in hot weather

(<https://www.gov.uk/government/publications/beat-the-heat-hot-weather-advice/beat-the-heat-staying-safe-in-hot-weather>) is available online. There you can find a full list of the groups who are especially at risk, as well as advice on keeping yourself and others safe during periods of hotter weather, such as:

- keeping your home cool (<https://www.gov.uk/government/publications/beat-the-heat-hot-weather-advice/beat-the-heat-keep-cool-at-home-checklist>) by closing windows and curtains in rooms that face the sun
- look out for those who may struggle to keep themselves cool and hydrated – older people, those with underlying conditions and those who live alone are particularly at risk
- stay cool indoors by closing curtains on rooms that face the sun – and remember that it may be cooler outdoors than indoors
- drink plenty of fluids and avoid excess alcohol
- never leave anyone in a closed, parked vehicle, especially infants, young children or animals
- check that fridges, freezers and fans are working properly
- try to avoid direct sunlight, especially between 11am and 3pm when UV levels are highest – if you do go outside, cover up with suitable clothing, such as an appropriate hat and sunglasses, and seek shade and apply sunscreen regularly
- walk in the shade, apply sunscreen and wear a wide-brimmed hat, if you have to go out in the heat
- avoid physical exertion in the hottest parts of the day
- make sure you take water with you if you are travelling
- take care and make sure to follow local safety advice (<https://www.gov.uk/government/news/environment-agency-warns-thames-users-to-stay-safe-on-the-river-this-summer>) if you are going into the water to cool down
- check medicines can be stored according to the instructions on the packaging
- if you are going to do a physical activity (for example, exercising or walking the dog), plan to do these during times of the day when it is cooler, such as the morning or evening – also check weather forecasts to see when it will be cooler

More information on common symptoms of heat exhaustion and heatstroke (<https://www.nhs.uk/conditions/heat-exhaustion-heatstroke/>) and what to do if you or someone else experiences them are available on NHS.UK.

21 June

The heat-health alerts are extended and updated from 11am on Monday 22 June for all regions in England. Amber alerts will be in place for London, the East Midlands, West Midlands, South East, South West, East of England, North West, Yorkshire and the Humber regions while a yellow alert will be in place for the North East. The alerts will be in place until 11.00pm on Friday 26 June.

The current alerts will remain in place until then.

Previous

20 June

From 11am on Monday 22 June, all regions of England will be under a heat-health alert. Amber alerts will be in place for the East Midlands, West Midlands, South East, South West, East of England, and London regions, while a yellow alert will be in place for the North West, North East, and Yorkshire and the Humber regions. The alerts will be in place until 11.59pm on Wednesday 24 June.

The current alerts will remain in place until then.

18 June

The UK Health Security Agency (UKHSA) has issued an updated heat-health alert (HHA) for parts of England, warning that rising temperatures may increase health risks, particularly for vulnerable groups.

An amber heat-health alert is now in place for the East of England, South East, South West and London until 8pm on Tuesday 23 June.

A yellow heat-health alert is in place for the West Midlands and East Midlands during this time. Other regions of England are currently unaffected.

Dr Agostinho Sousa, Head of Extreme Events and Health Protection at UKHSA, said:

“Sustained periods of warm weather can result in serious health outcomes, especially for older adults, and it is therefore important that everyone takes sensible precautions while enjoying the sun.

“We are urging health and social care services in affected regions to ensure they are prepared, and reminding people to look out for elderly relatives, neighbours, and those with underlying health conditions, making sure they are aware of the forecast and following the necessary advice.

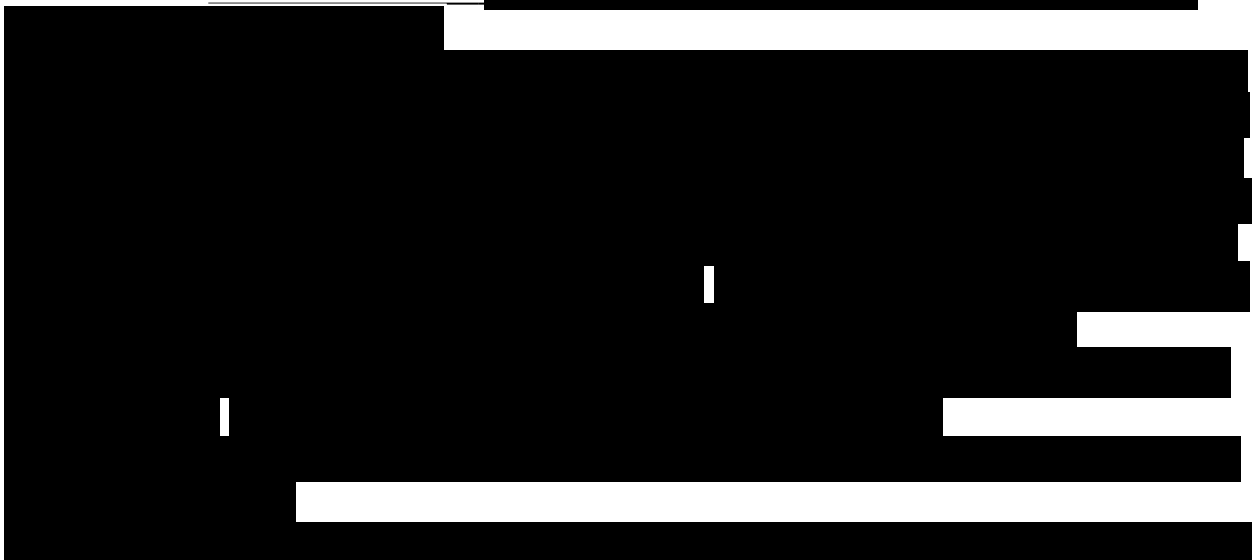
“Simple steps such as staying hydrated, avoiding the sun during the hottest part of the day, and keeping your home cool are some of the key ways to help keep yourself and others safe during periods of hot weather.”

UKHSA guidance on staying safe in hot weather

(<https://www.gov.uk/government/publications/beat-the-heat-hot-weather-advice/beat-the-heat-staying-safe-in-hot-weather>) is available online. There you can find a full list of the groups who are especially at risk, as well as advice on keeping yourself and others safe during periods of hotter weather, such as:

- keeping your home cool (<https://www.gov.uk/government/publications/beat-the-heat-hot-weather-advice/beat-the-heat-keep-cool-at-home-checklist>) by closing windows and curtains in rooms that face the sun
- try to avoid direct sunlight, especially between 11am and 3pm when UV levels are highest. If you do go outside, cover up with suitable clothing, such as an appropriate hat and sunglasses, and seek shade and apply sunscreen regularly
- if you are going to do a physical activity (for example, exercising or walking the dog), plan to do these during times of the day when it is cooler, such as the morning or evening. Also check weather forecasts to see when it will be cooler
- knowing the symptoms of heat exhaustion and heatstroke (<https://www.gov.uk/government/publications/beat-the-heat-hot-weather-advice/beat-the-heat-staying-safe-in-hot-weather>) and what to do if you or someone else has them

The UKHSA data dashboard





26 May

The UKHSA heat-health alert (<https://ukhsa-dashboard.data.gov.uk/weather-health-alerts/heat>) for the South West has been escalated to amber from today (26 May).

Amber heat-health alerts are now in place for the South West, South East, London, East of England, West Midlands and East Midlands, while the North East and North West remain under yellow alerts.

The duration of the alerts have also been extended by 24 hours and will now remain in place until 5pm on Thursday 28 May.

Previous

22 May

The UK Health Security Agency (UKHSA) has issued its first amber heat-health alert (HHA) of 2026 (<https://ukhsa-dashboard.data.gov.uk/weather-health-alerts/heat>), warning that high temperatures over the coming days may put vulnerable people at increased risk and reminding health and social care services to prepare for further alerts over the summer as temperatures rise.

The current heat health alert in place for the West Midlands, East Midlands, East of England, South East, and London regions will be escalated to amber from 2pm on Friday 22 May. This alert will remain in place until 5pm on Wednesday 27 May.

In addition, a yellow Heat-Health Alert will be in place for the North East, North West, South West, and Yorkshire and the Humber regions, and will be in place for the same period.

Under UKHSA and the Met Office's Weather-Health alerting system, an amber Heat Health alert means that any impacts will likely include:

- increased use of health care services by vulnerable populations
- an increase in risk to health for individuals aged over 65 years or those with pre-existing health conditions, including respiratory and cardiovascular diseases

Dr Anya Gopfert, Consultant in Health Protection at UKHSA, said:

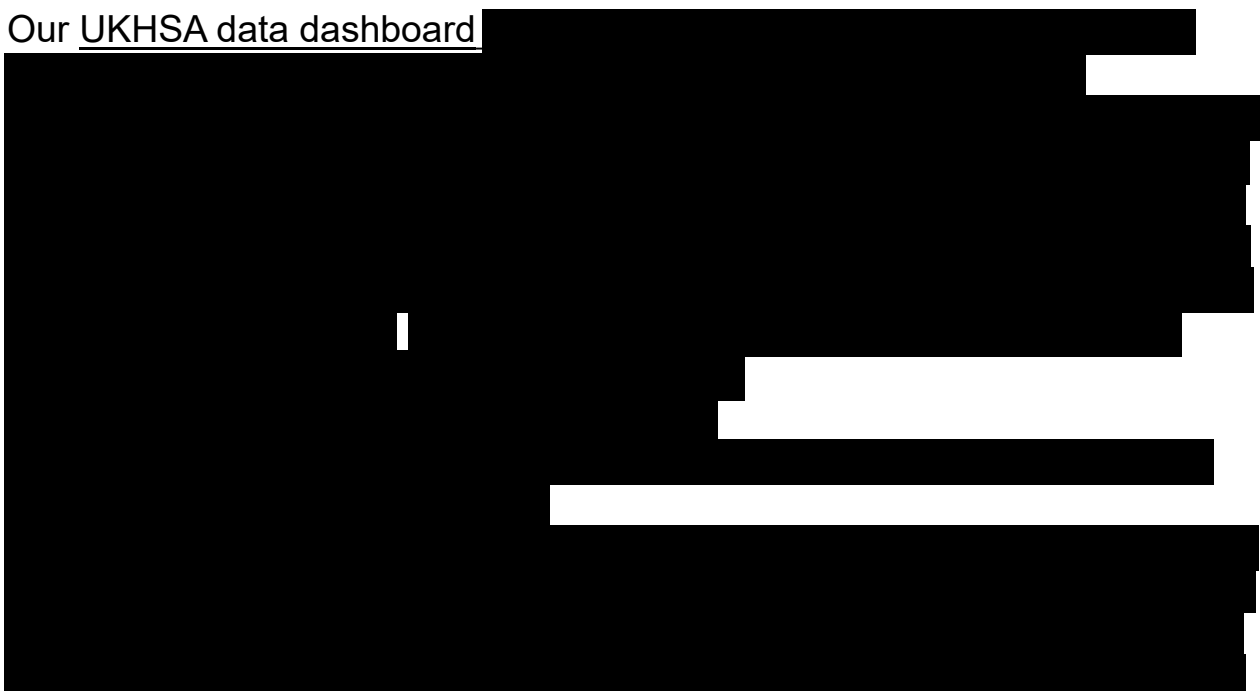
“We know that even moderate heat can lead to serious health problems, especially for older people and those with certain health conditions, so it’s important that everyone takes simple precautions while enjoying the warm weather over the coming days.

“If you have friends, family or neighbours who are more vulnerable, it is important to check in on them and ensure they are aware of the forecasts and are following the necessary advice.”

There are simple steps you can take to keep yourself and others safe during periods of hot weather (<https://www.gov.uk/government/publications/beat-the-heat-hot-weather-advice>), such as:

- keeping your home cool (<https://www.gov.uk/government/publications/beat-the-heat-hot-weather-advice/beat-the-heat-keep-cool-at-home-checklist>) by closing windows and curtains in rooms that face the sun
- if you do go outside, cover up with suitable clothing, such as an appropriate hat and sunglasses, and seek shade and apply sunscreen regularly
- keeping out of the sun at the hottest time of the day, between 11am and 3pm
- if you are going to do a physical activity (for example, exercising or walking the dog), plan to do these during times of the day when it is cooler, such as the morning or evening
- knowing the symptoms of heat exhaustion and heatstroke (<https://www.gov.uk/government/publications/beat-the-heat-hot-weather-advice/beat-the-heat-staying-safe-in-hot-weather>) and what to do if you or someone else has them

Our UKHSA data dashboard



[REDACTED] details how exactly heat impacts the body and what we can do avoid the negative effects.

Published 22 May 2026

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 Malmesbury, Wiltshire 21°C 

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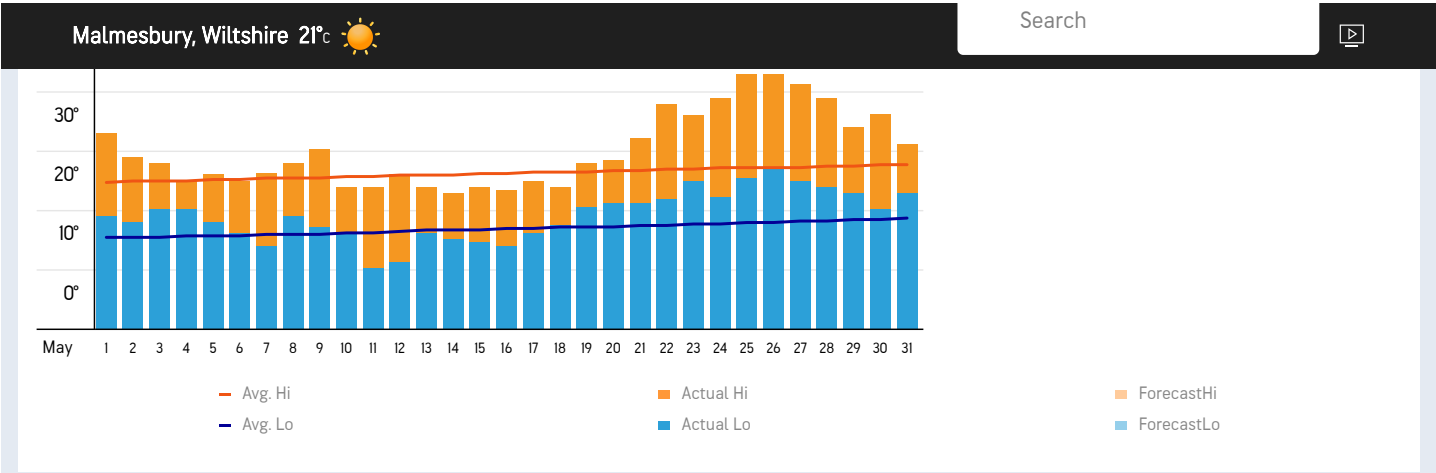
May ▾ 2026 ▾

10-DAY →

S	M	T	W	T	F	S
26	27	28	29	30	1	2
21° 6°	21° 7°	15° 8°	19° 6°	23° 7°	23° 9°	19° 8°
3	4	5	6	7	8	9
18° 10°	15° 10°	16° 8°	15° 6°	16° 4°	18° 9°	20° 7°
10	11	12	13	14	15	16
14° 6°	14° 0°	16° 1°	14° 6°	13° 5°	14° 5°	13° 4°
17	18	19	20	21	22	23
15° 6°	14° 8°	18° 10°	18° 11°	22° 11°	28° 12°	26° 15°
24	25	26	27	28	29	30
29° 12°	33° 15°	33° 17°	31° 15°	29° 14°	24° 13°	26° 10°
31	1	2	3	4	5	6
21° 13°	19° 11°	20° 14°	20° 12°	19° 12°	17° 11°	16° 11°

TEMPERATURE GRAPH

°C



MAY WEATHER IN MALMESBURY

Malmesbury's May 2026 forecast shows daily high temperatures ranging from ° to °, with overnight lows between ° and °. The average high for May is ° with an average low of °. AccuWeather's monthly forecast extends further ahead than any other source, with day-by-day [RealFeel® Temperatures](#) giving a complete picture of how May weather will actually feel in Malmesbury. See also: [June](#) | [July](#) | [August](#).

FURTHER AHEAD

- JUNE 2026 →
- JULY 2026 →
- AUGUST 2026 →
- AROUND THE GLOBE
- HURRICANE →
- SEVERE WEATHER →
- RADAR & MAPS →
- NEWS →
- VIDEO →

6.3. Appendix C: SLD Response to Applicant's Table FHW1.2-1 of [REP3-128]

NPS EN-1 §5.8.15 requirement raised by SLD. The FRA should...	SLD Position	Applicant Position	SLD Response
be proportionate to the risk and appropriate to the scale, nature and location of the project	No. For a large-scale, high-risk project in a sensitive location too many important factors are omitted	The assessment is proportionate to the mechanisms involved and to the scale, nature and location of the Scheme. NPS EN-1 requires a proportionate FRA; it does not require blanket dynamic hydraulic modelling across all panelled areas. The FRA considers both flood risk to the Scheme and flood risk arising from the Scheme, including potential effects on people, property, infrastructure and land outside the Order Limits. The Applicant's assessment is mechanism-specific: fluvial risk is assessed using Environment Agency mapping, Product 4 data, site specific modelling where justified and open-channel calculations for smaller ordinary watercourses where proportionate; formal impermeable infrastructure is assessed quantitatively; panelled areas are assessed having regard to their permeable ground condition, vegetation cover, soil management and hydrological connectivity. This is consistent with NPS EN-3 paragraph 2.10.84, which recognises that, as solar	Both SLD and the LLFA disagree that the assessment is proportionate. SLD's view is that (a) 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; (b) the nature of the project is that it will increase runoff rates and amounts and thus increase flood risk; and (c) 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. This implies that dynamic hydraulic modelling is



Stop Lime Down Deadline 4

		PV panels drain to the existing ground, the impact will not in general be significant. The Applicant does not rely on separate PINS scoping guidance for this point; the solar-specific policy position in NPS EN-3 and the site-specific flood risk evidence provide the relevant basis for the assessment. The Scheme is not predicted to increase off-site flood risk.	necessary for all sub-catchments capable of producing significant runoff. The Applicant's relies on NPS EN-3 paragraph 2.10.84 to justify its approach, but a key phrase in the statement is "in general". If this is taken to mean "in the majority of cases" then the Applicant needs to consider whether the area is in the minority of cases where the policy does not apply. This it has failed to do. As described in Appendix F2 of SLD's WR, 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. As argued in Appendix F2, the Applicant has not considered these factors but relied on generic statements such as Paragraph 2.10.84 which do not apply in this case.
consider the risk of flooding arising from the project in addition to the risk of flooding to the project	No. Risks to the project are discussed, but flooding arising from the project is hardly	The FRA considers flood risk both to and from the Scheme. SLD's position treats the panelled areas as if they form a connected impermeable drainage catchment. That is not correct. Solar PV panels are elevated above ground and rainfall drains to the existing ground beneath and between panel rows. The piles and legs are a negligible physical footprint and do not create a connected impermeable	The Applicant once again claims that SLD's position treats the panelled areas as if they form a connected impermeable drainage catchment. This is not the case as noted in the response to FHW1.3 above. SLD agrees that piles and legs have a negligible footprint and do not significantly reduce floodplain storage. SLD also agrees that the Applicant

	considered. Apart from the minor matter of the volume of the legs of the solar panels, the Applicant simply assumes it is not going to occur.	catchment. The number of piles does not alter that principle, because the relevant issue is whether runoff is intercepted and connected to a drainage system or flow route. Formal impermeable infrastructure, including substations, BESS compounds and other hardstanding, is separately drained, attenuated and controlled to the agreed discharge principles. Panelled-area runoff is controlled at source through vegetation, soil compaction control, surface flow connectivity and maintenance of existing drainage pathways. The Scheme is not predicted to increase off-site flood risk.	has assessed flood risks from formal hardstanding areas at least in principle. But the majority of the FRA document relates to the risks to the Applicant's own infrastructure rather than the people who live in the area and use the roads and footpaths. This is partly due to the assumption that the panelled areas will not produce additional runoff.
take the impacts of climate change into account, across a range of climate scenarios, clearly stating the development lifetime over which the assessment has been made	Yes.	The Applicant agrees that this requirement is addressed. Climate change allowances are stated and applied to the assessment of fluvial and rainfall-related flood risk where relevant. Drainage for formal impermeable infrastructure is assessed on the basis of the 1 in 100 year event plus climate change, with the 60-year operational lifetime of the Scheme taken into account	SLD and the Applicant are in agreement on this point.
be undertaken by competent people, as	Yes.	The Applicant agrees that this requirement is addressed. The FRA and Drainage Strategy documents were prepared by Arthian as competent	SLD and the Applicant are in agreement on this point.

early as possible in the process of preparing the proposal		flood risk and drainage consultants, supported by the wider EIA team. The assessment was developed through the pre-application stage and through engagement with the Environment Agency and Wiltshire Council LLFA.	
consider both the potential adverse and beneficial effects of flood risk management infrastructure, including raised defences, flow channels, flood storage areas and other artificial features, together with the consequences of their failure and exceedance	No. Little or no discussion of any of this.	The Scheme does not rely on raised flood defences or flood defence infrastructure to make it acceptable in flood risk terms, so the failure of such infrastructure does not arise. The relevant flood risk management infrastructure is the formal drainage infrastructure for impermeable areas. The effect of that infrastructure has been considered: its purpose is to attenuate and control runoff so that discharge from formal drainage areas is restricted to the agreed greenfield-equivalent or betterment rates. The effect is therefore neutral in flood risk terms, rather than adverse or beneficial. Exceedance is addressed through design principles requiring safe storage, routing and conveyance of flows where the drainage system capacity is exceeded. Final drainage features will be confirmed through the detailed drainage strategy secured by Requirement 11.	SLD accepts this a reasonable answer, although the issues are not discussed in the Environmental Statement.
consider the vulnerability of those using the	Yes.	The Applicant agrees that this requirement is addressed. The Scheme is essential infrastructure with limited operational attendance. The assessment	SLD and the Applicant are in agreement on this point.

site, including arrangements for safe access and escape		is proportionate to that use and vulnerability classification. More vulnerable infrastructure is sequentially located in areas of lower flood risk where practicable. Residual access and operational safety matters are managed through the relevant detailed management plans.	
consider and quantify the different types of flooding (whether from natural and human sources and including joint and cumulative effects) and include information on flood likelihood, speed-of-onset, depth, velocity, hazard and duration	No. No consideration of joint or cumulative effects, nothing on speed of onset, velocity, hazard or duration.	The FRA considers all relevant flood sources, including fluvial, surface water, groundwater, sewer, reservoir and canal flooding. Depth, extent and likelihood information is provided using Environment Agency Product 4 data, NaFRA, published mapping, LiDAR review and site-specific modelling where relevant. Velocity, hazard, duration and speed of onset are considered where the flood mechanism and level of interaction justify detailed assessment. NPS EN-1 does not require whole-Scheme dynamic hydraulic modelling where that would be disproportionate. For panelled areas, whole-Scheme modelling would require assumed future values for ground cover, surface roughness, soil compaction, runoff coefficient and hydrological connectivity. These are management-dependent variables controlled by embedded mitigation, rather than fixed hydraulic parameters. Detailed modelling has been undertaken for Gauze Brook and further modelling is being progressed for Gabriel's Well because those locations involve direct Main River and floodplain interaction	SLD agrees that all relevant flood sources have been considered. It is the absence of information on speed of onset, velocity, hazard or duration in the panel areas where the analysis falls short of the requirements of EN-1. The Applicant argues it is not proportionate to include it, but the sensitivity to rainfall shown by data from the Gauze Brook (see [APP1-174] §47-51) shows that dynamic hydraulic modelling is needed in the panel areas to capture the risks to the people of the Lime Down area and downstream, and to transport links and PRow's. Assumed or measured values for hydrological variables are a normal part of modelling and also allow management options to be assessed. Runoff from all of the panel areas ultimately leads to a Main River and the downstream floodplains.



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identify and secure opportunities to reduce the causes and impacts of flooding overall, making as much use as possible of natural flood management techniques as part of an integrated approach to flood risk management	No. As it is assumed that the increase in flood risk will be minimal, little consideration has been given to reducing the impacts of flooding except round the BESS area.	The Scheme does not rely on catchment-scale natural flood management to be acceptable. The land is predominantly agricultural and does not present the same type of drainage betterment opportunity as redevelopment of a brownfield site with a positive drainage network. However, the Scheme embeds measures which reduce runoff pathways and sediment mobilisation relative to an arable baseline, including permanent vegetated cover, reduced soil disturbance during operation, soil protection, compaction control, watercourse buffers, maintenance of existing flow routes and SuDS for formal impermeable infrastructure. The Applicant is also considering wider community flood risk opportunities around Gauze Brook, but those are not required to make the Scheme acceptable in flood risk terms.	There are other opportunities for natural flood management on the Avon upstream of Malmesbury. The Applicant has not taken any opportunity that exists to alleviate the existing flooding in the area.
consider the effects of a range of flooding events including extreme events on people, property, the natural and historic environment	No. Nothing on this point.	The FRA considers a range of flood events and flood sources, including fluvial and surface water flooding, climate change allowances and residual extreme events. The assessment considers people and property through the review of off-site flood risk, existing receptors, safe operation and access, and the effect of the Scheme on floodplain storage, flow routes and downstream risk. The natural environment is addressed through the hydrology assessment, WFD Assessment, watercourse buffers, drainage strategy and pollution prevention controls. The	There is no assessment of risks to people and property off site in the ES, and no links to any document which discusses this in the "Specific Signposting" column in the Applicant's original response table. This may be because the Applicant does not believe that there is any off-site flood risk, and this of course precludes any effects on either the natural or human environment. SLD does not accept this premise, and remains concerned about the issues.

and river and coastal processes		Scheme is not located in a coastal setting, and coastal processes are not a relevant flood mechanism for this Scheme.	
include the assessment of the remaining (known as 'residual') risk after risk reduction measures have been taken into account and demonstrate that these risks can be safely managed, ensuring people will not be exposed to hazardous flooding	No. Residual risks are not assessed, they are simply assumed to have been mitigated by a set of possible measures.	Residual risk has been assessed following the incorporation of embedded mitigation. The Scheme design has followed an iterative approach, with flood risk controls embedded into siting, layout and design rather than added as separate mitigation after the assessment. This includes sequential siting of sensitive infrastructure, elevation and resilience of equipment where appropriate, watercourse buffers, flood-compatible panelled areas, restricted drainage discharge for formal impermeable infrastructure, soil management and construction/operational management controls. The residual risk assessment is therefore a with embedded- mitigation assessment. It does not rely on uncommitted measures, and no further flood risk mitigation is required to avoid significant flood risk effects.	SLD maintains its point that although there is embedded mitigation as the Applicant says, there is no assessment of how well it is likely to work.
Describe the existing surface water drainage arrangements for the site	Yes. In outline, but probably adequate.	The Applicant agrees that this requirement is addressed. The existing Solar PV Sites comprise predominantly undeveloped agricultural land with no formal positive drainage network. Runoff discharges overland to local land drainage features, ordinary watercourses and Main Rivers, with local topography,	SLD is generally in agreement with the Applicant here, but notes the LLFA is concerned about damage to the agricultural drainage network.

		ditches, watercourses and surface water pathways described in the site-specific assessments.	
Set out (approximately) the existing rates and volumes of surface water run-off generated by the site. Detail the proposals for restricting discharge rates	No. No information on existing rates and volumes. Proposals for restricting discharge only for the BESS.	For undeveloped agricultural land, existing runoff is appropriately described as greenfield runoff. Field-wide runoff quantification is not required for the panelled areas because they do not form connected impermeable catchments and do not discharge to a positive drainage network. Quantitative runoff rates, attenuation volumes and restricted discharge rates are provided where the Scheme introduces formal impermeable infrastructure. Further high-level existing runoff rates and volumes for each site are provided in response to FHW1.3. Formal drainage areas will discharge at greenfield-equivalent or betterment rates, including the Wiltshire LLFA betterment principle where applicable.	The ExA express their concern about this issue in FHW1.3. SLD notes that the Applicant intends to provide more information by Deadline 4, but the analysis required by EN-1 does not exist at present.
Set out proposals for managing and discharging surface water from the site using sustainable drainage systems and accounting for the predicted impacts of	Yes. But proposals are vague and in outline only. SuDS systems are not rejected.	SuDS proposals are provided at an outline level appropriate for DCO stage. SuDS have not been rejected. The outline drainage strategy identifies the drainage hierarchy, potential SuDS types, attenuation, discharge control, exceedance routing and climate change allowances for formal impermeable infrastructure. The final form, location and sizing of SuDS will be confirmed through detailed design and secured under Requirement 11. This is appropriate because final technology, levels, platform layouts, impermeable areas and outfall arrangements will be confirmed at detailed design. The documents will be retitled as Flood Risk Assessment and Outline	SLD maintains its position that the proposals are too vague. The issue is discussed further under FHW1.3 above.



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climate change. If sustainable drainage systems have been rejected, present clear evidence of why their inclusion would be inappropriate.		Drainage Strategy documents at Deadline 4, with clearly labelled Outline Drainage Strategy sections. Engagement with the Environment Agency remains ongoing through the Statement of Common Ground process, and the Applicant will update the drainage documents at Deadline 4 to provide clearer signposting and additional drainage information	
Demonstrate how the hierarchy of drainage options has been followed.	Yes.	The Applicant agrees that this requirement is addressed. The drainage hierarchy is set out in the covering report and applied in the site-specific drainage strategies. Where infiltration is not feasible or is not appropriate due to ground conditions, groundwater or other constraints, restricted discharge to watercourse or existing drainage features is considered in accordance with the hierarchy.	SLD and the Applicant are in agreement on this point.
Explain and justify why the types of SuDS and method of discharge have been selected and why they are considered appropriate	No. All options for SuDS types are left open.	This is addressed at outline design level. The drainage strategy identifies suitable SuDS options and discharge principles, while retaining appropriate flexibility over final components. That flexibility is necessary and proportionate at DCO stage because final levels, technology, layouts, impermeable areas, ground investigation and outfall details will be confirmed at detailed design. The detailed drainage strategy will need to demonstrate compliance with the	SLD notes this response and the implied commitment to meet the requirement at DCO stage.



Stop Lime Down Deadline 4

		hierarchy, climate change allowances, discharge restrictions, water quality treatment, exceedance and maintenance requirements. This is consistent with the National Standards for Sustainable Drainage Systems approach, which focuses on destination, volume, peak flow, water quality, amenity, biodiversity and long-term operation rather than fixing detailed components before detailed design.	
Explain how sustainable drainage systems have been integrated with other aspects of the development such as open space or green infrastructure, so as to ensure an efficient use of the site.	No. No information about the spatial distribution or design of SuDS schemes.	The outline drainage strategy identifies SuDS options and their relationship with the Scheme layout. The precise spatial distribution and detailed design of SuDS will be confirmed at detailed design once final drainage locations, levels and outfalls are fixed. That is appropriate for a DCO-stage outline drainage strategy. The Applicant will also address the ExA's specific request in FHW1.3 regarding the addition of SuDS features to the Landscape and Ecology Mitigation Plans, so that drainage, landscape and ecology interfaces are appropriately coordinated.	See discussion of FHW1.3 above.
Describe the multifunctional benefits the sustainable drainage system will provide.	No.	This is addressed at outline level and will be expanded through the updated Outline Drainage Strategy sections. SuDS options such as swales, detention basins, ponds, filter drains and bioretention systems can provide multiple functions: attenuation and flow control, water quality treatment, conveyance, sediment capture, landscape integration	SLD notes that the Applicant intends to cover this requirement at Deadline 4.

		and biodiversity habitat. For example, a detention basin or pond can attenuate runoff while also providing marginal planting, wetland habitat and ecological connectivity where this is compatible with safety, maintenance and operational requirements. The final multifunctional design will be confirmed at detailed design and coordinated with the landscape and ecological mitigation proposals.	
Set out which opportunities to reduce the causes and impacts of flooding have been identified and included as part of the proposed sustainable drainage system.	No.	The proposed SuDS and drainage principles reduce potential flood risk impacts by restricting discharge from formal impermeable infrastructure to greenfield-equivalent or betterment rates, providing attenuation storage, managing exceedance and maintaining existing surface water flow routes. A specific example is the BESS Area, where runoff from formal impermeable infrastructure is collected, attenuated and discharged at a restricted rate rather than being released uncontrolled. Across the wider Scheme, permeable ground, vegetated cover, soil protection, compaction control and watercourse buffers reduce the potential for adverse runoff pathways compared with an unmanaged construction or operational scenario	SLD accepts that the causes and impacts of flooding from formal impermeable infrastructure have been addressed in principle. In the wider scheme, SLD continues to maintain that the proposed mitigation will be inadequate.
Explain how run-off from the completed development will be prevented from	No. It is simply assumed that there will not be any	This is not assumed. The assessment distinguishes between panelled areas and formal impermeable infrastructure. Panelled areas remain permeable and rainfall drains to ground. The risk mechanism is therefore controlled through vegetation establishment, soil compaction control, maintenance	SLD accepts that the causes and impacts of flooding from formal impermeable infrastructure have been addressed in principle. In the wider scheme, SLD continues to maintain that the proposed mitigation will be inadequate.



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causing an impact elsewhere	excess runoff.	of surface flow connectivity and preservation of existing drainage pathways. Formal impermeable infrastructure is controlled through engineered drainage, attenuation, restricted discharge, water quality treatment and exceedance routing. The Scheme is not predicted to increase off-site flood risk. For formal drainage areas, discharge will be limited to the agreed restricted rates rather than released uncontrolled	
Explain how the sustainable drainage system been designed to facilitate maintenance and, where relevant, adoption. Set out plans for ensuring an acceptable standard of operation and maintenance throughout the lifetime of the development.	No. Any plans that may exist are not presented. Only vague outline statements are available.	Maintenance is addressed at outline level and will be fixed through the detailed drainage strategy and operational management controls. Adoption by a statutory undertaker is not expected and is not relied upon. The drainage system is expected to remain private and to be maintained by the Applicant or undertaker throughout the operational lifetime of the Scheme. Requirement 11 secures the detailed drainage strategy, including maintenance provisions. Operational inspection and maintenance will also be secured through the detailed OEMP. Decommissioning will be addressed through the detailed Decommissioning Strategy, including the removal, retirement or reinstatement of drainage features as appropriate at the end of the Scheme's operational life.	SLD maintains its position, but notes that maintenance issues will need to wait for the detailed design phase.



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detail those measures that will be included to ensure the development will be safe and remain operational during a flooding event throughout the development's lifetime without increasing flood risk elsewhere	No. Some of this is mentioned but the issue is not specifically discussed.	This is addressed. More vulnerable infrastructure has been sequentially located in areas of lower flood risk where practicable. BESS and substations are located outside Flood Zones 2 and 3 where practicable and formal impermeable infrastructure is drained and attenuated. Drainage for formal impermeable infrastructure is designed to manage the 1 in 100 year event plus climate change, with exceedance routing considered for events above the design standard. Solar panels are elevated above existing ground levels, are flood-compatible infrastructure and do not materially obstruct flows or reduce floodplain storage. Electrical equipment in areas of residual flood risk will be designed with appropriate resilience, including freeboard where required. The Scheme is not predicted to increase flood risk elsewhere.	SLD notes the measures listed here, but also notes concerns in the EA response ([REP3-146] §EA-050) that the fencing surrounding the panel areas will trap debris and impede flood flow routes.
identify and secure opportunities to reduce the causes and impacts of flooding overall during the period of construction	No. Some measures are discussed, but there is no integrated statement.	Construction-phase flood risk and runoff pathways are addressed through the Outline CEMP, Outline SRMP and the construction-stage Water Management Plan to be prepared as part of the detailed CEMP. The Water Management Plan will set out how temporary drainage, runoff from disturbed ground, silt and sediment control, existing flow routes, temporary crossings, watercourse protection, groundwater management, contingency measures and exceedance flows will be managed during construction. Soil compaction and reinstatement risks will be managed through the SRMP. These controls	SLD notes that this issue will be addressed in the Water Management Plan which is yet to be prepared and the various management plans which are currently available only in outline. SLD therefore maintains its position on this issue.

		reduce the causes and impacts of construction-phase runoff and sediment mobilisation	
be supported by appropriate data and information, including historical information on previous events.	No. Very little data is presented. Historical research is limited to the Environment Agency's historical flood maps, which are incomplete. There is a large amount of information on flooding in the Bristol Avon catchment.	The assessment is supported by appropriate data and information, including Environment Agency Flood Map for Planning, Product 4 data, historic flood mapping, NaFRA surface water mapping, LiDAR, BGS and MAGIC mapping, WFD data, local hydrology, topographic review and consultation with the Environment Agency and LLFA. The Environment Agency records supplied through Product 4 were considered and included in the assessment. SLD's reliance on river flow gauge data and anecdotal evidence does not displace the proportionate evidence base used in the FRA, and does not demonstrate a requirement for whole-Scheme dynamic hydraulic modelling. Baseline data and modelling scope have been discussed with the Environment Agency and Wiltshire Council LLFA through consultation and the Statements of Common Ground. Where further clarification or updates are being made, these are identified in the Applicant's responses, including FHW1.3 and FHW1.5.	SLD maintains its position that there is more historical information that could profitably be included, such as the records of the Malmesbury Community Flood Defence Scheme, and the Malmesbury Groundwater scheme. Study of these sources would have enabled the Applicant to appreciate the long history of flooding in the area, and avoid false confidence in its mitigation measures.



6.4. Appendix D: University of Derby's response to [REP3-132]

University of Derby's response to separate technical note: *Lime Down Solar Park: Climate Response to Wiltshire Council Appendix B of Written Rep and Stop Down Appendix J1 June 2026 [REP3-132]*

Concentrating Solar Power (CSP) and Zero Carbon Theme, University of Derby, Kedleston Road, Derby DE22 1GB

Team: [REDACTED]

(* Independent Consultant)

Date: 7th July 2026

Introduction

1.1 Background

1.1.1 Further to the submission of the University of Derby's report entitled "*Findings of University of Derby on initial investigation of the Environmental Statement V1 Chapter 7: Climate Change (APP-059)*" **[REP1-179]** and further submissions made by Wiltshire Council (incorporating University of Exeter) and Councillor Jon Atkey, the Applicant responded in a separate technical note entitled "*Lime Down Solar Park: Climate Response to Wiltshire Council Appendix B of Written Rep and Stop Lime Down Appendix J1*", hereafter referred to as **[REP3-132] or the technical note** in this report.

1.1.2 In **[REP3-132]**, the Applicant addresses several points directly to University of Derby (hereafter, UoD):

- underestimated emissions (covered in Section 2 of the technical note)
- low estimates for energy output (covered in Section 3 of the technical note)
- and carbon payback time (covered in Section 5 of the technical note)

The technical note also addresses impacts versus benefits (section 6), comparison of Scheme's carbon emissions with similar Schemes (section 7 and scenario testing (section 8).

2.0 University of Derby response to technical note [REP3-132]

2.1 Table 2.1 below summarises both the Applicants response as given in **[REP3-132]** to pertinent issues raised by UoD in our initial report **[UoD Appendix J1, 2026]** and our corresponding reply to each of these points.

2.2 The Section References in Table 2.1 refer to section numbering as given in the Applicants separate technical note **[REP3-132]**.

2.3 In the following University of Exeter is referred to as UoE and University of Derby as UoD. The UoE report is presented as Appendix B of Wiltshire Councils written representation **[REP1-138]** (referred to here as **[UoE Appendix B, 2026]**).

Table 2.1 Summary of issues raised in the Applicants technical note [REP3-132] and UoD's comments in reply.

Section Reference (as given in [REP3-132])	Summary of Applicant Response (as given in [REP3-132])	Comments from UoD in reply
1.0 INTRODUCTION		
1.2	Table 1, 2 nd row comments on Construction and whole-life GHG emissions and is aimed at the responder: Wilts Council and UoE.	There is a slight error in this in that the summary of comments as given in Table 1 is actually a combination of: • UoD's estimates for construction emissions (it doesn't include UoD's adjustments to operational emissions). • UoE's estimates for construction and operational emissions.
2.0 EMISSION CALCULATIONS		
2.1.6	Regarding construction plant emissions, ES Chapter 7 [APP-059] acknowledges that detailed fuel consumption wasn't available at the time due to absence of contractor-specific information. However, based on experience from comparable solar developments and short duration of construction activities, construction plant emissions are expected to represent less than 1% of total lifecycle greenhouse gas emissions.	Regarding UoD's re-estimates of certain GHG emissions, the Applicant covered construction plant fuel with their comment (left). (UoD's estimate for this was 2,500-3,500 tCO ₂ e which represents 0.04% of total GHG emissions as worse case). The Applicant made no further comments on the following construction issues from UoD (other than a mention in Table 1): • increase in cabling emissions from 876 to 20,762 tCO₂e. • increase in concrete emissions from 5 to 1,526-3,509 tCO₂e. • inclusion of 2,500-3,700 tCO₂e for separate non-transformer substation emissions. The Applicant made no comments on UoD's operational emission additions: • Sulphur Hexafluoride (estimate 1,830 to 8,542 tCO₂e). • on-site cable replacement (estimate 1,660 tCO₂e). • mounting and tracker panel moving components (862 tCO₂e). • non-transformer substation refurbishment (2400 tCO₂e). While we note the limited time available to respond in this technical note, we would welcome the Applicant commenting upon the UoD's (and UoE's) larger GHG inventory in the future. Currently, the Applicant has not fully engaged with that part of the assessment.
2.1.7 to 2.1.8	Applicant response to UoE was also relevant to UoD: this refers to the intentionally conservative generation estimates, based on design information available at the	We agree that higher generation would increase avoided emissions, and our report deliberately used the more favourable ES lifetime generation figure (24.26 TWh) for exactly that reason.

	time presented in ES Chapter 7 [APP-059] . Should operational electricity generation exceed these values, associated GHG savings would be greater than reported, thereby increasing overall climate benefit of the Scheme. Applicant and UoE both conclude that Scheme would generate substantial quantities of renewable electricity and contribute to the decarbonisation of the UK electricity situation	
2.1.9	A notional figure of 842,000 panels is assumed for this technical note. This reflects an estimated maximum achievable installed capacity of the Scheme within the defined design parameters and accommodates technological advancements and increase efficiency in panel design and mounting systems since the preparation of ES Chapter 7 [APP-059] .	This is a new and significant statement. It confirms that the 598,260-panel configuration assessed in the ES is not the maximum achievable within the design envelope, and therefore that the ES did not assess the reasonable worst case for embodied and lifecycle emissions. On feasibility, using the module wattage class implied by the stated module weight of 38.3 kg (approximately 650 to 700 Wp, ES 7.10.13 and our [UoD Appendix J1, 2026 (Appendix A)], 842,000 panels correspond to roughly 547 to 589 MWp. At the stated module area of 3.10 m² the actual panel surface area would be approximately 261 ha, this implies a ground coverage ratio of approximately 53 to 64 per cent, above the typical utility-scale range of 35 to 50 per cent, and a power density of roughly 0.73 to 0.79 MWp/ha, materially above comparable UK solar NSIPs. These are our estimates, a clarification of the installed DC capacity corresponding to 842,000 panels would explain how that count is accommodated within the design parameters. We note in Section 3 of the technical note, which mentions that the site is sufficiently land-constrained that an 18 degree tilt and 7.5 m pitch are required. It is not clear how the same constrained site accommodates a 41 per cent increase in panel numbers.
3.0 ENERGY OUTPUT		
3.1.1	This comments that UoD's PVsyst yield for Lime Down 500Mwp bifacial scenarios appear to be overstated, the most likely explanations being an elevated irradiance input and optimistic or undisclosed system loss assumptions, combined with array design choices that are impractical for a land constrained UK utility site. The value of 1,289	Our solar-model runs were presented as an independent sense check of the ES output figures, prepared using transparent optimum default assumptions because the ES disclosed no tilt, pitch, module wattage, loss table or installed DC capacity. The 18 degree tilt and 7.5 m pitch now cited by the Applicant appear nowhere in the ES; ES Chapter 3 Table 3-1 states a fixed-panel tilt range of 10 to 35 degrees, so the Applicant's design assumptions were not inferable from the Application documents at the time our report was prepared.

	kWh/KWp (based on 644.7 GWh/yr for 500 MWp) is not credible for UK Single-Axis-Tracker arrays.	It is interesting to note that the UoD researchers, working independently, achieved 1,220 kWh/m ² using Global Solar Atlas default values and a 38° tilt angle.
3.1.2 to 3.1.3	Table 3.1 presents a comparison of UoD's projected energy outputs using PVsyst with the Applicant's projected energy outputs from Solar Gis and Meteonorm for Fixed Tilt (FT) and Single Axis Trackers (SAT). UoD's irradiance values are substantially higher. The UoD report does not disclose a line by line loss table.	See points above in response to 3.1.1. In response to absence of line-by-line loss table, UoD were validating the given energy output data from the ES [APP-059] and used the modelling system default values based on no other information available at the time. We have subsequently used Global Solar Atlas with a tilt angle of 18° and get 498 GWh/yr and 1171 KWh/m ² which is still higher than the Table 3.1 values.
3.14	UoD FT result is consistent with a high tilt and while the 38° used may be a theoretical optimum for UK latitudes, it is not practical on a constrained UK site.	We were not aware of the Applicant's 18° tilt angle at the time of writing but we accept that disclosure aids comparison, and we can further work on our model configurations and provide those details. We note, however, that neither the ES nor the Technical Note publishes the reports, loss tables or design parameters underlying the ES generation figures or Table 3.1. We have found that a tilt angle in Global Solar Atlas achieves 498 GWh/yr and 1171 KWh/m ² . Separately, the Applicant's own Table 3.1 shows single-axis tracker output exceeding fixed-tilt output in every simulation presented (570.1 against 524.1 GWh on SolarGIS irradiance; 588.7 against 536.9 GWh on Meteonorm). The ES reports the opposite ordering (tracker 415 GWh below fixed 438 GWh). This apparent reversal of outputs was raised in our report [UoD Appendix J1, 2026] and by the University of Exeter [UoE Appendix B, 2026] and remains unexplained in the Technical Note. It also bears on ExQ1 CC1.3, which asks the Applicant to confirm that tracker panels were treated as the worst case in the carbon calculation.
3.15	Irradiance dataset selection has a direct effect on yield. SolarGIS represents the accepted industry standard.	We accept this but were not aware that this was the modelling system used by the Applicant at the time of writing our report.
3.1.6	Applicants mentions that transparency in loss assumptions are essential and that full, line-by-line breakdown (soiling, LID, mismatch, AC and DC wiring) would be required to validate PVsyst outputs provided by UoD.	Again refer to point made in response to 3.14 above regarding using modelling as validation of given energy outputs in the ES [APP-059] . given no other information available at the time of writing. We believe we used a reasonable expert approach based on the information provided.
5.0 PAYBACK YEAR		
5.1.1	Applicant refers to whole-life emissions bring reported (as	Our payback analysis applied the comparison framework the ES itself constructed. ES Chapter 7

	per ISEP guidance) gross by life stage, any avoided emissions being presented separately as contextual information and not netted off the inventory to claim a “payback” year or to determine significance	calculates avoided emissions against the 2029 grid factor and reports net savings (ES paras 7.10.91 to 7.10.96, including net saving figures of 253,839 tCO₂e for fixed and 218,611 tCO₂e for tracker panels). The technical note itself presents netted values throughout Table 8.1 under the heading 'Net Benefit'. This methodology was simply adopted in testing sensitivity to the grid. We have reviewed the ISEP guidance and NPS EN-1 paragraph 5.3.4 and find no prohibition on payback or break-even analysis; gross reporting by life stage and sensitivity testing of the netted comparison are not mutually exclusive, and our report presents both.
5.1.3	Applicant comments that given ongoing future emissions and requirement to report inventories gross, it is not methodologically sound to state that “construction emissions are removed by year X”. Instead the appropriate comparison is to demonstrate the Scheme’s operational carbon intensity is lower than the opening-year grid average as per ES Chapter 7 (sections 7.4.20 to 22)	REP3-132 section 6.1.5 p13 compares the Grid and the Scheme’s operational performance in 2029 i.e. year 1 (on a like for like basis): • Scheme GHG intensity is 28-29 gCO₂e/kWh • UK Grid GHG intensity is 49 gCO₂e/kWh Using the same comparator, this means that according to (DESNZ, 2023) figures of the UK Grid Intensity, which were used in the ES, in the year 2033 (i.e. quite early on in the Scheme’s lifetime) the Grid outperforms the Scheme, achieving values less than 28 gCO₂e/kWh thereafter.
5.1.4	Applicant comments that significance is judged on alignment with NZ trajectory and evidence that reasonable measures to reduce emissions have been taken, not on achieving a particular “payback year”	UoD would agree in principle but would draw attention to the point made above in 5.1.1 and 5.1.3 which are relevant to this issue.
5.2.1 to 5.2.5	These sections question UoD’s comparison of the Scheme with the UK Grid as not being “like-for-like”. For example, the UK Grid GHG Intensity values (as per DESNZ 2023) are based on territorial and operational emissions, whereas the Scheme’s inventory accounts for global and lifetime emissions. This biases the contextual comparison towards an understatement of emissions savings. Renewable energy contributes to a decarbonised grid and similarly, BESS grid-	We accept the observation about system boundaries in principle, and we note the following, point that has already been observed in our response to 5.1.3 above. The Scheme adopts the approach in the ES to compare its operational performance with that of the UK grid in the first year of operation (2029) with the Scheme achieving 28 gCO₂e/kWh as compared to the UK Grid at 49 gCO₂e/kWh. However, given that there is not a better approach to use, by the year 2033 (which is early on in the Scheme’s lifecycle) the Grid is already performing better with values lower than 28 gCO₂e/kWh [DESNZ, 2023]

	balancing function further reduces fossil fuel dependency.	
7.0 COMPARISON OF SCHEME'S CARBON EMISSIONS WITH SIMILAR SCHEMES (This in response to the Wilts Council/UoE's report)		
7.1.3	Applicant refers to importance of like-for-like comparison. In reference to comment from UoE re: unusually high emissions compared to other Schemes and the suggestion that methodology or accounting boundaries may be driving the outcome. Applicant observes that "interested party's observation appears to conflate territorial, operational-only figures (commonly reported in high-level comparisons); with the Scheme's global, lifecycle inventory (including overseas manufacturing and sea freight), which is broader by design and therefore higher than territorial operational numbers for "similar schemes"	Whilst this point was aimed at Wilts Council/UoE, it is also relevant to UoD, in that we compared the Schemes with the UK Grid. We acknowledge the comment but are also mindful of the point that we raised in section 5.2.1 to 5.2.5 above.
8.0 SCENARIO TESTING		
8.1.1to	Table 8.1 is presented as a sensitivity check on: shorter operational lifespan of 40 years as opposed to current 60-year proposed, 50% uplift in HGV traffic and Increased number of solar panels. It concludes that the Scheme's overall GHG emissions are relatively insensitive to any increases in construction traffic and panel numbers. Reducing the number of operational years from 60 to 40 years substantially reduces the carbon benefit but that the Scheme is still estimated to deliver a net reduction in GHGs over its operational lifetime compared to baseline scenario	We appreciate that there was not sufficient time to address the increased GHG emissions inventory (as suggested separately by UoE and UoD) in this technical note and would welcome the Applicant reviewing this in the future. We find that using the Applicants figures and carrying out our own estimate of net benefit values, we obtain the following results: - For fixed panels in Table 8.1 (deduce that this is for "fixed" panels based on ES Chapter 7 para 7.10.96) - Applicant: 253,839 tCO₂e - UoD: 255,850 tCO₂e (using applicant figures) - The Applicant didn't mention Trackers in Table 8.1 but: - Applicant: 218,611 tCO₂e (ES Ch7 7.10.96) - UoD: 193,414 tCO₂e (using the Applicant's figures) The results for fixed panels are not too dissimilar. There is a slight difference of 25,197 tCO₂e for trackers.

3.0 Conclusions

3.1 Our conclusions based upon our review of the Applicants technical note can be divided under the following headings:

- GHG Emissions:
 - o UoD's estimated GHG emissions (construction and operational).
 - o Increased panel numbers GHG emissions.
- Energy Outputs:
 - o System Modelling and UoD's higher Energy Outputs.
 - o Apparent reversal of tracker and fixed panel energy outputs.
- Payback year (and net savings).
- Increased panel numbers and land constraints.

3.2 GHG Emissions

3.2.1 UoD's estimated construction and operational emissions in **[UoD Appendix J1, 2026]**.

In our report, we had re-estimated or added various construction and operational emissions to the reported GHG inventory in the ES Chapter 7 **[APP-059]**, namely:

- Construction emissions: cables and concrete had been understated in the ES and no comment was made on these in the technical note **[REP3-132]**
- Construction plant fuel and non-transformer scope:
 - o plant fuel was addressed in **[REP3-132]**.
 - o whereas, no comment was made on non-transformer substation emissions in **REP3-132**.
- Operational emissions: we had added the following to the existing GHG inventory stated in the **ES Chapter 7**, upon which no comment was made in the technical note **[REP1-132]**:
 - o Sulphur Hexafluoride.
 - o on-site cable replacement.
 - o mounting and tracker panel moving components.
 - o substation refurbishment.

We appreciate the short lead-time required to prepare the technical note but would ask that UoD's (and UoE's) larger inventory in the future be addressed in the future.

3.2.3 Increased panel number:

The notational increase to 842,000 panels indicates that the 598,260-panel configuration assessed in the **ES Chapter 7** is not the maximum achievable within

the given design envelope and therefore, the ES did not assess the reasonable worst case for embodied and lifecycle emissions.

3.3 Energy Outputs

3.3.1 System modelling and UoD's higher energy outputs:

The Applicant addressed energy outputs and questioned our modelling strategy for producing higher values than themselves and not demonstrating transparency in loss assumptions. We would counter that we simply used PVsyst and Global Solar Atlas as a validation of the energy outputs as given in the ES, using system default values and a tilt angle of 38°, no other information being available at the time. However, we accept that disclosure aids comparison, and we can further work on our model configurations and provide those details if design features can be made available to us.

3.3.2 Apparent tracker and fixed energy output reversal:

The Applicant didn't comment on apparent reversal of tracker and fixed panel energy outputs encountered in the **ES Chapter 7** in their technical note (both UoD and UoE had previously commented on this in their original reports, [**UoD Appendix J1, 2026**] and [**UoE Appendix B, 2026**] respectively). However, it is apparent from Table 3.1 of the technical note that the tracker values are being shown as higher than those of the fixed panels for both the simulations (SolarGIS and Meteonorm) shown. We would ask for further clarity on this matter. It also bears on the ExQ1 CC1.3 which asks the Applicant to confirm that tracker panels were treated as the worst case in the carbon calculation.

3.4 Payback year, net savings and issue of “like-for-like” comparison between the Scheme and UK Grid

We acknowledge the view given in the technical note that the Applicant does not agree with UoD's comparison of the Scheme with the UK Grid citing that the Scheme is based on global and lifetime emissions, whereas the Grid is based on operation and territorial emissions i.e. not “like-for-like”. Instead, the Applicant compares the operational performance of the Scheme in its first operational year (2029) with the UK Grid:

- Scheme GHG Intensity: 28 gCO₂e/kWh
- UK Grid GHG Intensity: 49 gCO₂e/kWh

However, using (DESNZ, 2023) intensity figures for the UK Grid, the Grid performs better than the Scheme from 2033 thereafter. 2033 is early on in the Scheme's lifetime.

Further, our payback analysis applied the comparison framework that the ES Chapter 7 itself constructed; if the comparison is not like-for-like, that conclusion applies equally to the ES's own headline net savings (ES 7.10.96) and to every "Net benefit" figure in Table 8.1 of the technical note.

A review of the ISEP and NPS EN-1(paragraph 5.3.4) indicates that there is no prohibition on payback or break-even analysis. We would argue that gross reporting by life stage and sensitivity testing of the netted comparison are not mutually exclusive and our report [**UoD Appendix J1, 2026**] presents both.

3.5 Increased panels in technical note and land constraints

The notional increase to 842,000 panels indicates that the ES chapter 7 did not assess the reasonable worst case for embodied and lifecycle emissions. We estimate that the stated increase represents a ground coverage of 53 to 64% i.e. greater than the typical utility range of 35 to 50% and a power density of approximately 0.73 to 0.79 MWp/ha. A clarification of the installed DC capacity corresponding to this 41% increase number of panels would explain how the count is accommodated on the land-constrained site that is referred to in section 3 of the technical note.

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