



Application by Lime Down Solar Park Limited for the Lime Down Solar Project

The Examining Authority's second written questions and requests for information (ExQ2) - Issued on Monday 27 July 2026

This document sets out the Examining Authority's (ExA's) second written questions and requests for information (ExQ2).

Questions are set out using an issues-based framework derived from the initial assessment of principal issues provided at Annex C to the Rule 6 Letter, dated 9 February 2026. Questions have been informed by the relevant policies, the application documents, interested party and affected persons written and oral submissions, responses to first written questions (ExQ1), the ExA's site inspections, and hearings held in the examination to date.

Each question has a unique reference number which starts with an alphabetical code and then has an issue number and a question number. For example, the first question on Air Quality is identified as AQ2.1. When you are answering a question, please start your answer by quoting the unique reference number, for example 'ExQ2 AQ2.1'.

Column 2 of the table indicates which interested parties (IPs) or other persons each question is directed to. The ExA would be grateful if all persons named could answer all questions directed to them, providing a substantive response, or indicating that the question is not relevant to them for a reason. This does not prevent any persons or organisations from answering a question which is not directed to them if the question is relevant to their interests.

You should respond to the questions by using the [Have your say](#) function on the project page of the National Infrastructure website and selecting 'Responses to Examining Authority's Second Written Questions (ExQ2)' when asked. If you are responding to a small number of questions, you can submit your answers by choosing 'Make a comment' and inputting your answers into the 'Your comments' box. If you are answering a larger number of questions, you should download a copy of the [Microsoft Word](#) version of the document, enter your answers into the Word version and save the document using an appropriate file name. You can then submit the completed document by selecting 'Upload files'.

The Examination Library

References in these questions which are set out in square brackets, for example [APP-010], are to documents catalogued in the [Examination Library](#). The Examination Library will be updated regularly as the examination progresses. Anybody wishing to look back at ExQ1 can find them at Examination Library reference [\[PD-010\]](#).

Responses are due by Deadline 5, Friday 7 August 2026



ABBREVIATIONS USED

BESS	battery energy storage system	HGV	heavy goods vehicle
BNG	biodiversity net gain	HIA	Highway Improvement Area
CAH	compulsory acquisition hearing	HRA	Habitats Regulation Assessment
CIEEM	Chartered Institute of Ecologists and Environmental Managers	ISH	issue specific hearing
CLG	Community Liaison Group	km	kilometre
CNL	Cotswold National Landscape	kV	kilovolt
CNLB	Cotswold National Landscape Board	LLFA	lead local flood authority
CRC	cable route corridor	LOAEL	Lowest Observable Adverse Effect Level
CRoW	Countryside and Rights of Way Act 2000	LSE	likely significant effects
dB	decibel	NMU	non-motorised user
DCO	Development Consent Order	NPS	National Policy Statement*
dDCO	draft Development Consent Order	NSIP	Nationally Significant Infrastructure Project
EA	Environment Agency	oBSMP	outline Battery Safety Management Plan
EIA	Environmental Impact Assessment	oCEMP	outline Construction Environment Management Plan
EPD	environmental product declaration	oCTMP	outline Construction Traffic Management Plan
ES	Environmental Statement	oDS	outline Decommissioning Strategy
ExA	Examining Authority	oEPMS	outline Ecological Protection and Mitigation Strategy
ExQ1	Examining Authority's first written questions	oLEMP	outline Landscape and Ecological Mitigation Plan
GHG	greenhouse gas	oOEMP	outline Operational Environmental Management Plan
GCN	great crested newt	oSRMP	outline Soil Resources Management Plan
HDD	horizontal directional drilling	oSSCEP	outline Skills Supply Chain and Employment Plan
		PDA	potential development areas



PPW	permitted preliminary works
PRoW	public rights of way
PV	photovoltaic
RoFSW	risk of flooding from surface water
SAC	Special Area of Conservation
SF₆	sulphur hexafluoride
SGD	supplementary guidance document
SOAEL	Significant Observed Adverse Effect Level

SoCG	statement of common ground
SoS	Secretary of State
SUDS	sustainable drainage systems
TPO	tree preservation order
WBA	Wiltshire Bridleways Association
WMP	Water Management Plan
WR	written representation
yr	year

* Any reference to NPS's in these questions refer to the suite of NPS's dated November 2023, and which came into force in January 2024, unless stated otherwise.



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ExQ2	Question to:	Question:
The Applicant and all other IPs are reminded that unless otherwise stated within individual questions, the responses to these questions are required to be submitted at deadline 5 of the examination, which is Friday 7 August 2026. This is to ensure that the ExA can review the responses sufficiently in advance of its requirement to notify which topics/ issues will be covered further in issue specific hearings in September 2026. Delays to the submission of responses, will hinder the ability of the ExA to properly examine areas that remain of concern or are still in dispute in the latter stage of the examination. If any party feels that it needs further time to provide a response then it is required to speak to the case team in the first instance; however, all parties should assume that requests for late submissions are likely to be refused except in exceptional circumstances.		
Air Quality and Emissions (AQ)		
AQ2.1	Dorset and Wiltshire Fire and Rescue Service	Battery Energy Storage System (BESS) Thermal Runway Event Dorset and Wiltshire Fire and Rescue Service are requested to consider the applicant’s response to the Examining Authority’s (ExA’s) ExQ1 specifically AQ1.3 [REP3-128] , and in addition to doing so provide a response to the following: 1) During a thermal runaway event advise where would the secondary water source come from once the on-site water storage units are empty. 2) Provide detail on how many fire appliances the fire service would have available at any one time in the likely event of a fire at either a single or multiple containers and would this be sufficient to deal with any thermal runaway event 3) Whether the fire service has had any discussions with the applicant and/ or local highway authority about emergency access routes to the BESS enclosure.
Assessment of Alternatives (ALT)		
ALT2.1	The Applicant	Site Selection Process – Consistency Q1 The applicant’s Technical Note on Site Selection Assessment [REP2-043] sets out, in Table 4-1, areas of newly drawn Potential Development Areas (PDAs) with all constraints removed. However, it neglects to provide a figure for PDA 10 (the site subject of this application) on the basis that the document focuses on alternatives to the current site. However, the ExA requires Table 4-1 to be updated to include PDA 10 to provide an overall comparison between sites to ensure that a consistent site selection process was undertaken.
ALT2.2	The Applicant	Site Selection Process – Consistency Q2 It is not clear to the ExA that a consistent approach has been applied to the site selection process given that the current site contains environmental constraints used to justify the exclusion of other sites, i.e. flood risk, ecology, cultural heritage and landscape. This is particularly prominent through the applicant’s Technical Note on Site Selection Assessment [REP2-043] as highlighted by the ExA in ExQ1 ALT1.1. Furthermore, it is not clear whether those sites assessed at stages 1 - 4 were then re-assessed with the more flexible criteria identified at stages 5 and 6 in the applicant’s search assessment. The applicant is asked to provide a table showing the information on each PDA considered in the Environmental Statement (ES) Chapter 4 [APP-056] , Appendix 4-1 Site Selection Assessment Report [APP-185] and Technical Note on Site Selection Assessment [REP2-043] with a concise commentary as to the key differences and why each site was discarded resulting in the current Order limits.
ALT2.3	The Applicant	Site Selection Process – Consistency Q3 In the ES Chapter 4 [APP-056] , it is not clear that a consistent methodology was applied to the cable route corridor (CRC) selection process. Paragraph 4.6.4 appears to add an additional criterion (road verge) to allow a further route to be considered. The applicant is asked to explain why the use of road verge was added to cater for Route 4, and if the use of the road verge was considered for any other route, and if not, why not.
ALT2.4	The Applicant	Site Selection Process – Consistency Q4 ES Chapter 4 [APP-056] sets out why land at Melksham was discounted for the location of the BESS Area. However, it is not clear what weighting was applied to those concerns bulleted in paragraphs 4.7.3 and 4.7.4 that led to Melksham being discounted over the environmental concerns of siting the BESS Area at Lime Down D. The applicant is asked to provide further detail as to the weighting that was applied when weighing up siting the BESS at Melksham or at Lime Down D.
Compulsory Acquisition and Land Rights (CA)		
CA2.1	The Applicant	Land and Rights Negotiations Tracker Q1 The ExA notes that the colour key for the Land and Rights Tracker [REP4-008] states that cells shaded light grey means that no voluntary agreement is being sought. However, the applicant’s summary of negotiations column in Part 1 of the Tracker for all the affected persons/ plots which have been

ExQ2	Question to:	Question:
		shaded light grey, states that <i>the applicant if confident that temporary access rights can be voluntarily agreed</i> . The ExA seeks clarification on how the applicant can be confident of voluntarily agreeing temporary access rights if no voluntary agreements are being sought with the affected persons.
CA2.2	The Applicant	Land and Rights Negotiations Tracker Q2 In Part 2 of the Land and Rights Tracker [REP4-008], the applicant lists the statutory undertakers who may have apparatus and interest in various parcels of land, however, for many of these (for example, but not limited, to C.A. Telecom Limited, Melskham East Storage Limited, Southern Electric Power Distribution plc, etc.) the applicant's summary of negotiations cells merely state <i>n/a</i>, while the protective provision status cells state that the relevant undertaker would have the benefit of protective provisions set out in relevant parts of Schedule 15 of the dDCO but <i>has not requested bespoke protective provisions</i>. The ExA seeks confirmation from the applicant that the statutory undertakers which have not requested bespoke provisions have been consulted and communicated with in advance of and during this examination so that they are aware of the general draft protective provisions.
CA2.3	The Applicant	Land and Rights Negotiations Tracker Q3 Part 3 of the Land and Rights Tracker [REP4-008] was inserted by the applicant at deadline 3 in response to ExQ1 CA1.18. The ExA notes, however, that the summary of negotiations column was not updated at deadline 4, and requests that the applicant updates this at deadline 5. While the ExA appreciates that the applicant's negotiations are primarily with the landowner, rather than tenants or leaseholders, the ExA is seeking a greater level of detail in the summary of negotiations column to evidence active dialogue with the affected persons, and it is seeking for the status of negotiations column to be colour coded as per the colour key used in Part 1. This is to provide the ExA with a greater understanding of the progress being made.
CA2.4	The Applicant	Negotiations Q1 The ExA acknowledges the applicant's comments at Compulsory Acquisition Hearing 1 (CAH1) on 30 June 2026 that a number of landowners, particularly along the CRC, have an in-principle objection to the scheme and therefore may be unwilling to enter into a voluntary agreement. However, there have been multiple representations from affected persons (including some orally made at CAH1) that identify lack of engagement from the applicant for the private loss of land or rights, or the lack of meaningful engagement on alternative proposals that they believe could reduce the effect of the proposed development on their land (and farm businesses in some cases). Can you convince the ExA that you have sought to acquire land and rights by negotiation wherever practicable and only enough land to facilitate the development, in line with the guidance related to the procedures for the compulsory acquisition (CA) of land. Provide a general justification, and specific justification for all the affected parties listed in ExQ1 CA1.22 to CA1.33 [PD-010], many of whom spoke at CAH1. Note that signposting to the Land and Rights Tracker status of negotiations column will not suffice.
CA2.5	Any Affected Persons	Negotiations Q2 In light of ExQ2 CA2.4 put to the applicant, the ExA invites affected persons to submit comments at deadline 6 (Friday 21 August 2026) on the applicant's response to that question. Affected persons may, at the same time, wish to summarise their unresolved positions on the implications of the CA and Temporary Possession powers affecting their land, their rights or their businesses (although note that there is no need to repeat previous submissions which have been submitted into the examination).
CA2.6	The Applicant	Continuance of Farming At CAH1 the ExA asked the applicant to what extent the applicant would be assisting tenant farmers/ leaseholders look for alternative land should those affected persons wish to continue farming in the area. The applicant explained that under the terms of the contractual arrangements, responsibility rests with the landowner, although the applicant is providing assistance through reimbursement of legal fees and support with administrative requirements. However, the applicant clarified that if CA powers are exercised then the responsibility would rest with the applicant. The applicant is asked to explain how these responsibilities have been communicated with the tenant farmers/ leaseholders so that they are aware of what assistance is available to them.
CA2.7	The Applicant	Notice Period for Temporary Possession (Article 31 of Draft Development Consent Order) Article 31(3) of the draft Development Consent Order (dDCO) requires only 14 days' notice to be given to a landowner/ occupier before entering on and taking temporary possession of land. The ExA notes that the notice period included in other made Orders (not least The Springwell Solar Farm Order 2026, The Dean Moor Solar Farm Order 2026, and The Peartree Hill Solar Farm Order 2026) is 28 days. The applicant is requested to replace 14 days with 28 days in its next revision of the dDCO or justify why a shorter period is appropriate in this case.
CA2.8	The Applicant	Restoration of Drainage Associated with Temporary Possession of Land In ExQ1 CA1.13 the ExA enquired about the powers in Article 31(5)(a), which allow the undertaker not to have to reinstate certain structures, plant vegetation and drainage, etc. which may be removed from land during construction of the scheme, and whether those powers are proportionate having regard to the potential impacts on affected persons. The applicant's response that a blanket reinstatement obligation may not be appropriate in all cases is noted [REP3-128], however, at CAH1 the matter of drainage was raised by several affected persons, who were concerned that existing drainage may be

ExQ2	Question to:	Question:
		altered/ removed or would not perform the same function when the land is handed back. The applicant's representative explained that the heads of terms contain drainage provisions, including a commitment to appoint an independent drainage consultant to assist with the design process. The applicant also clarified that there was a commitment in ES Chapter 11 (Hydrology, Flood Risk and Drainage) for an independent drainage engineer, whilst also agreeing to look at whether some additional wording could be included in the outline Construction Environmental Management Plan, such that there would be reassurance that concerns would be addressed if an affected party did not want to sign the voluntary agreement. The ExA has reviewed the latest version of ES Chapter 11 [REP4-012] and could not find any reference to affected persons being able to avail themselves of the services of an independent drainage engineer, but in any event the ExA considers that any such commitment, along with a commitment to inspect existing drainage infrastructure pre and post construction, is best placed in a management plan, which the Council would have to approve. 1) The ExA acknowledges that the heads of terms may contain a commitment to appointing an independent drainage engineer, but not all affected persons have signed heads of terms, so some additional drafting should be put forward into the oCEMP. 2) As was highlighted at CAH1, damage done to drainage, particularly on agricultural land, may not become apparent for several years after the temporary use and hand back of the land, and there needs to be some recourse available to the landowner(s) at that time for any drainage damage to be rectified. The applicant is therefore requested to consider whether recourse provisions should be included in the outline Operational Environmental Management Plan (oOEMP). 3) The ExA also seeks clarity on how an independent drainage engineer would be appointed, by whom, when and at whose cost? Notwithstanding the above questions, the ExA continues to be concerned about the powers in Article 31(5)(a) not to reinstate any drainage removed if the landowner requires it. The ExA notes that Revision 5 of the oCEMP [REP4-049] has included some additional text in Table 5, which states: <i>Within the cable installation working width, existing agricultural field drains identified in consultation with the landowner prior to the start of the relevant works, or encountered during those works, will be recorded. Where such drains are disturbed by the cable installation works, they will be reinstated, diverted or otherwise made good following completion of the relevant section of construction so as to maintain the affected field drainage function.</i> 4) The ExA seeks to understand from the applicant if there are any contradictions between Article 31(5)(a) not to reinstate any drainage and the monitoring and mitigation measures now included in Table 5 of the oCEMP.
CA2.9	The Applicant	Scope and Purpose of Rights and Powers Sought In ExQ1 CA1.8 the ExA asked why the inclusion of Article 25, paragraph (4), which was inserted into Revision 2 of the dDCO [REP1-008], was necessary. The applicant's position [REP3-128] is that there may be circumstances where the permanent acquisition or extinguishment of a private right or restrictive covenant is necessary, and that unlike paragraphs (1) – (3), which operate automatically, paragraph (4) is a notice-based mechanism which requires the applicant to make deliberate action to extinguish a right or covenant. The ExA is struggling to comprehend a situation where the powers in paragraph (4) would be necessary in addition to the powers already contained in paragraphs (1) – (3), particularly as paragraphs (1) – (3) all state that the powers of extinguishment of rights or covenants would only apply insofar as the continuance of those rights or covenants would be inconsistent with the exercise of compulsory acquisition powers. Thus, it seems to the ExA that the inclusion of paragraph (4) provides carte blanche powers for the undertaker to permanently extinguish rights or covenants over any land subject to compulsory acquisition powers (permanent or temporary) without justification or necessity, irrespective of the included notice provision. The ExA also notes that paragraph (4) does not feature in other recently made Orders, such as The Springwell Solar Farm Order 2026, The Dean Moor Solar Farm Order 2026, or the Peartree Hill Solar Farm Order 2026. 1) As a result, the applicant is required to fully justify why retention of Article 25, paragraph (4) is necessary and how the powers contained in sub-paragraphs (1) – (3) are not sufficient. 2) If retention of Article 25 paragraph (4) is considered and evidenced to be necessary, the applicant is asked to explain whether its powers would interfere with any of the provisions or requirements in Article 27 (Power to override easements and other rights), particularly compensation requirements?
CA2.10	The Applicant Grenergy Renewables UK Limited	Grenergy Renewables UK Limited – Plot 15-014 Grenergy Renewables UK Limited's interest in Plot 15-014 on the Land Plans [REP1-004] was included in the Book of Reference at deadline 3 [REP3-009]. Grenergy advised at deadline 3 [REP3-156] that it had met the applicant's team and the parties agreed to seek to enter into a cooperation agreement to resolve Grenergy's concerns, but that a draft agreement was awaited from the applicant's team.

ExQ2	Question to:	Question:
		Can both parties please update the ExA on the state of discussions between the parties.
CA2.11	The Applicant	Different Types of Agreements The ExA seeks clarification on the difference between several terms that have been used in the various representations and submissions: such as options agreement, voluntary agreement, lease agreement and heads of terms. Provide an explanation in writing, the sequence in which these agreements might be reached during the DCO process and their status in the DCO process, clearly identifying which would be considerations in the examination, and which would be negotiated outside the scope of the examination; or signpost where this explanation can be found.
CA2.12	The Applicant	Other Consents and Agreements Section 11 of the Statement of Reasons [APP-018] states that the applicant requires or may require various other consents, as well as a DCO, in order to build and operate the Scheme and has set this information out in The Consents and Agreements Position Statement [APP-272]. Please indicate whether there are any changes to the status for each consent, licence and agreement listed within the Position Statement since the application was submitted, or if any additional consents, licences and agreements need to be added.
Climate Change (CC)		
CC2.1	The Applicant	Sulphur Hexafluoride (SF₆) The recent Secretary of State (SoS) decision for The Peartree Hill Solar Farm Order 2026, secures the commitment from the applicant to avoid the use of SF₆ in switchgear components. This was secured in that applicant's Design Parameters Document. Furthermore, the same commitment was provided in ES Chapter 14: Carbon and Climate Change of The One Earth Solar Farm Order 2026. The approach is supported by NPS EN-5 paragraphs 2.9.59 to 2.9.64, 2.10.14, 2.10.15 and 2.11.17. The applicant is requested to make the same commitment and update the necessary documents. If it cannot make the same commitment, then it should provide an explanation as to why not.
CC2.2	The Applicant	Climate Change/ GHG Emissions Calculations The Universities of Derby and Exeter, through submissions by Stop Lime Down [REP1-182] and Wiltshire Council [REP1-138] respectively, advocate the use of Environmental Product Declarations (EPDs) to calculate greenhouse gas (GHG) emissions and derive a carbon payback period. The applicant rejects this approach [REP3-132]. However, a similar methodology was adopted in the recent Development Consent Orders (DCOs) for The Peartree Hill Solar Farm Order 2026, The One Earth Solar Farm Order 2026 and The Springwell Solar Farm Order 2026. In those cases, carbon payback periods were provided, with The Peartree Hill Solar Farm Order 2026 estimating a payback period of 13 years, while both The One Earth Solar Farm Order 2026 and The Springwell Solar Farm Order 2026 reported payback periods of approximately 3 years. Although there is no universally accepted method for assessing the carbon impact of solar developments, a commonly used approach is to present a straightforward carbon payback figure. This is typically derived using a combination of EPDs, peer-reviewed scientific literature, and carbon assessment tools such as One Click Life Cycle Assessment. The provision of a payback year is clearly an approach the SoS has accepted in other DCOs, but it is acknowledged that it has not been provided in all cases, for example The Dean Moor Solar Farm Order 2026. Nevertheless, the applicant is asked to respond to the following: 1) Given the detailed assessments submitted by Wiltshire Council and Stop Lime Down that query the climate benefits, the applicant is asked to provide its own payback figure, i.e. when the proposal will save more GHG emissions than it took to implement and periodically replace the main components of the development. However, it is appreciated that this is not necessarily an exact science and the applicant's deadline 3 submission [REP3-132] is noted. 2) In addition to the provision of a payback figure, the applicant is requested to respond fully to the comments from Stop Lime Down's deadline 4 submission [REP4-132] table 2.1 pages 172 – 176. We suggest that an additional column to this table would be the clearest method to provide this information and inform the ExA of the exact areas of disagreement. 3) Finally, the applicant is asked to confirm the maximum number of solar PV panels they expect to install. ES Chapter 7 [APP-059] provides a figure of 598,260. However, at deadline 3, the applicant's Climate Change Sensitivity Assessment Report [REP3-132] stated that <i>a notional figure of approximately 842,000 panels has been assumed, which reflects an estimated maximum achievable installed capacity of the Scheme within the defined design parameters</i>. Furthermore, the applicant cited a figure of 864,000 at Issue Specific Hearing 3 (ISH3) during the discussion on HGV trips. The applicant is asked to explain this difference, update the relevant documentation using the correct figure and clarify that it has informed the climate change assessment.

ExQ2	Question to:	Question:
Cultural Heritage (CH)		
Archaeology		
CH2.1	The Applicant	Geophysical Survey for the Cable Route Corridor The applicant is asked to provide an update of the outstanding Geophysical Surveys for the CRC. If the results of the outstanding surveys will not be completed within the timeframe of the examination, the applicant is asked to set out what controls would be put in place in the control documents and dDCO to ensure that archaeological impacts are adequately dealt with.
CH2.2	Wiltshire Council	Concrete Feet The ExA note that in Wiltshire Council's relevant representation [RR- 4934] it states that Wiltshire Council Archaeology Service (WCAS) is not supportive of the use of concrete feet as it is considered that is too much risk for impacts upon sub surface archaeology from construction directly over it without mitigation. It also states that WCAS would wish to see panels located away from features in these circumstances so that any impact can be avoided. Is Wiltshire Council able to specify any locations where concrete feet would not be appropriate and where it considers solar PV panels should be removed from the proposed development to prevent unacceptable impacts on sub surface archaeology?
CH2.3	Stop Lime Down	Direct Impacts to the Fosse Way Wiltshire Council's response [REP2-046] to Stop Lime Down's concerns regarding the direct impacts on the Fosse Way stated that: <i>Wiltshire Council Archaeology Service (WCAS) considers that there is no direct impact on the Roman road itself, which has already been heavily impacted by modern road construction. Its relationship to the archaeological sites identified by the geophysical survey will remain unchanged if the solar farm is constructed, as the heritage assets to the southeast of the road are sub-surface features, so there will be no visual impact to their relationship, which is purely spatial. Those sites impacted by development will be preserved by record, knowledge which will add to understanding of the landscape.</i> Stop Lime Down is asked to respond to this and confirm if it maintains that there would be a direct moderate adverse (significant) effect on the Fosse Way?
CH2.4	The Applicant	Scheduled Monument - Pillow Mound In Appendix C to its written representation (WR) [REP1-171], Stop Lime Down state that a reasonable worst case for the scheduled monument 'Pillow mound 280m southwest of Surrendell Farm' would be that Horizontal Directional Drilling (HDD) is not viable in this location and a program of strip, map and sample (SMS) is undertaken. Stop Lime Down state that in this case, the residual effect of SMS would be moderate adverse (significant). 1) Although the ExA note that the applicant has confirmed that HDD is currently proposed in this location [REP3-129], should a reasonable worst case for the assessment of effect on this asset be that HDD is not possible and that a program of SMS would be undertaken? 2) What would be the residual effect on this asset if SMS is employed in this location?
CH2.5	Historic England	Preservation by Record – Receptor D24-01 In Appendix C to its WR [REP1-171], Stop Lime Down state that preservation by record, through its nature mitigates harm, it does not eliminate it to the extent assessed by the applicant. As such, Stop Lime Down consider that for receptor D24-01 the residual effect would be moderate adverse (significant), and for other receptors such as C13-01 and C29-01 it would be moderate/ minor. On the other hand, WCAS [REP2-046] consider that excavation of an archaeological site to Chartered Institute for Archaeologists (CIFA) and WCAS standards would substantially reduce the effect of impact upon archaeological sites of local and regional importance such that there would be a negligible adverse effect. Historic England is asked to comment on the extent to which preservation by record can reduce the direct adverse effect on archaeology at this receptor?
CH2.6	The Applicant Wiltshire Council Historic England	Evaluation Trial Trenching Reports and the Outline Archaeological Mitigation Strategy (oAMS) The ExA note from the statement of common ground (SoCG) between the applicant and both Wiltshire Council [REP4-061] and Historic England [REP4-065] that full evaluation trial trenching reports have been shared with these parties. <u>The Applicant:</u> 1) The applicant is asked to submit the full evaluation trial trenching reports into the examination. <u>The Applicant, Wiltshire Council and Historic England:</u>

ExQ2	Question to:	Question:
		2) The parties are each asked to provide an update of any discussions that have been undertaken in relation to the evaluation trial trenching reports and any resultant changes that would need to be made to the oAMS or Requirement 12 of the dDCO.
Built Heritage		
CH2.7	Applicant	Direct Physical Impacts on Built Heritage The ExA notes the applicant's response to ExQ1 CH1.11 [REP3-128] . The applicant is asked to confirm if the proposed routing of construction traffic set out in the outline Construction Traffic Management Plan (oCTMP) [REP4-057] removes the potential for swipes, strikes, or vibration from heavy goods vehicles and construction traffic to cause direct physical impacts to heritage assets? If not, the applicant is asked to expand on the measures that will be taken to prevent direct physical impacts to heritage assets?
CH2.8	The Applicant	Avil's Farmhouse (Grade II) The applicant [REP2-039] , in response to Stop Lime Down's WR [REP1-167] , states that it welcomes Stop Lime Down's conclusion of a negligible adverse effect on Avil's Farmhouse. As this would be an increased residual effect from the neutral effect reported in appendix 12-8 of the ES [APP-232] , the applicant is asked to confirm if there would be 'less than substantial harm' to Avil's Farmhouse?
CH2.9	Wiltshire Council	Rodbourne Conservation Area The SoCG between the applicant and Wiltshire Council [REP4-061] records Wiltshire Council's position that: <i>Amendments to the Outline CEMP [REP3-092] and Outline CTMP [REP1-112] intended to mitigate the impact on the Rodbourne Conservation Area via the involvement of the Conservation Officer in the design of the works does not provide any effective mitigation, as the design is unknown and there is no certainty that there will be a solution which can prevent the occurrence of harm.</i> Wiltshire Council is asked if it can set out what further design information it would need to be provided with to enable the council to confirm whether or not there could be a potential design solution to mitigate the impact on the Conservation Area?
CH2.10	Historic England Wiltshire Council	Bradfield Manor Farmhouse (Grade I) The ExA notes that the SoCG between the applicant and Historic England [REP4-065] records that the approach to safeguarding designated heritage assets is agreed. With regards to Bradfield Manor Farmhouse, the SoCG records that Historic England acknowledge that in winter the screening would not be so effective and that in the longer distance views the harm caused by panels would not be mitigated. The SoCG records that Historic England consider that the panels would cause harm, but that harm would be less than substantial. <u>Historic England:</u> 1) Can Historic England confirm if it agrees with the applicant's assessment in the Heritage Statement [APP-219] that the harm to Bradfield Manor Farmhouse Would be at the lower end of the scale of less than substantial harm? <u>Wiltshire Council:</u> 2) Do Wiltshire Council agree with Historic England's position on Bradfield Manor Farmhouse? If not, please explain its position including any additional mitigation measures that would be necessary and the level of harm that Bradfield Manor Farmhouse would experience.
CH2.11	Wiltshire Council The Applicant	Grittleton House (Grade II*) The ExA notes Wiltshire Council's response to ExQ1 CH1.16 that it considers more robust and effective management proposals need to be incorporated in the outline management plans which could assist in mitigating the impact from the scheme on the business and hence on the future viability and conservation of the asset. <u>Wiltshire Council:</u> 1) Wiltshire Council are asked to clarify whether its concern is in relation to an adverse socio-economic impact which may have an indirect impact on the conservation of the asset, or is it primarily an impact on the setting of the asset in heritage assessment terms which in turn impacts the economic viability of the business (or both)? <u>The Applicant and Wiltshire Council:</u> 2) Both parties are asked to provide an update of any further discussions that have taken place regarding further mitigation measures that could be put in place, while the applicant is asked to provide commentary on the level of engagement it has had with the owners of Grittleton House on this matter.

ExQ2	Question to:	Question:
CH1.12	The Applicant Wiltshire Council Historic England	Adaptive Management of Mitigation With regards to the approach to mitigation for built heritage, the SoCG between the applicant and Wiltshire council [REP4-061] records that Wiltshire Council consider that the deadline 3 updates to the oCEMP [REP3 092] in line with the outline Landscape and Ecological Management Plan (oLEMP) [REP3-100] do not include any proposals for monitoring or assessing the efficacy of the landscaping in providing the mitigation envisaged or for making amendments if required in the future. <u>The Applicant:</u> 1) The applicant is asked to review and respond with proposed measures for the adaptive management of mitigation. <u>Wiltshire Council and Historic England:</u> 2) Wiltshire Council and Historic England are asked to propose any changes that should be made to the management plans to secure adequate monitoring, assessment of efficacy and adaptations to the mitigation measures as they deem necessary.
CH1.13	The Applicant Wiltshire Council Historic England Stop Lime Down	Noise Impacts In response to Stop Lime Down’s WR [REP1-167], it is noted that the applicant states [REP2-039] that the noise impact on built heritage assets has been assessed to not constitute a significant effect on health and quality of life. The applicant is asked whether the significance of effect on health or quality of life is an appropriate threshold for determining whether noise from the proposed development would have an adverse impact on the setting of heritage assets or whether noise can have a significant effect on the setting and understanding of a heritage asset without crossing the threshold of significance for health or quality of life? In response, please provide references to any relevant guidance. Wiltshire Council, Historic England and Stop Lime Down may also wish to comment on this matter.
CH1.14	The Applicant	Heritage Viewpoints The applicant is asked to provide a wireframe outline of the proposed development in the views from Bradfield Manor Farmhouse, and the viewpoint photography looking west from Farleaze Farm towards Lime Down C as requested by Wiltshire Council in its response to ExQ1 CH1.2 [REP3-142].
Cumulative Effects (CE)		
CE2.1	The Applicant	List of Cumulative Projects The applicant is requested to consider whether planning application PL/2026/03545, as provided by Wiltshire Council [REP4-090], should be included in their long-list of cumulative developments. If so, please update the relevant documentation accordingly. If not, please provide an explanation.
Draft Development Consent Order (dDCO)		
Questions within this section refer to the dDCO updated at Deadline 4 [REP4-004] (clean version)/ [REP4-005] (tracked version)		
General Matters		
DCO2.1	All Interested Parties and Statutory Undertakers	Residual Issues with the dDCO and Management Plans The dDCO is an important document and the ExA is under a duty to provide the SoS with a recommended version of the DCO. This is because the SoS is the decision maker. Therefore, even if the ExA were to recommend to the SoS that development consent should not be granted, the ExA must still append a recommended version of the DCO, thus it is important that the ExA is able to put forward the best DCO that it can. The dDCO has been revised four times during the examination to date. A proportion of what has been requested by interested parties has been included in the Order, another proportion has been addressed through the updating of associated management plans, and other elements the applicant has resisted with reasons. While the position of many interested parties and/or statutory undertakers may be that development consent should not be granted, without prejudice to your position, you are invited to: 1) Outline any remaining or residual issues that you have with any articles, requirements or schedules of the dDCO, set out why the applicant has not yet resolved your concerns or why you are not content with the applicant’s justification, and define what remedy or solutions you are seeking (including suggested redrafting if applicable) to address your concerns, and explain (make your case) why the applicant, the ExA and the SoS should consider such amendments to the dDCO. Statutory Undertakers are also alerted to ExQ2 DCO2.23 which specifically relates to protected provisions. 2) Outline any remaining or residual issues that you have with any of the management plans/ documents listed below, set out why the applicant has not yet resolved your concerns or why you are not content with the applicant’s justification, and define what remedy or solutions or amendments you are seeking to address your concerns within the drafting of the relevant management plan(s)/ document(s):

ExQ2	Question to:	Question:
		- Outline Construction Environmental Management Plan (Latest Version, Revision 5 [REP4-049]) - Outline Operational Environmental Management Plan (Latest Version, Revision 5 [REP4-051]) - Outline Decommissioning Strategy (Latest Version, Revision 3 [REP3-096]) - Outline Soil Resources Management Plan (Latest Version, Revision 2 [REP3-098]) - Outline Site Waste Management Plan (Latest Version, Revision 2 [REP1-102]) - Outline Public Rights of Way and Permissive Paths Management Plan (Latest Version, Revision 1 [APP-282]) - Outline Landscape and Ecological Management Plan (Latest Version, Revision 2 [REP3-100]) - Outline Ecological Protection and Mitigation Strategy (Latest Version, Revision 4 [REP4-055]) - Outline Skills, Supply Chain and Employment Plan (Latest Version, Revision 1 [APP-285]) - Outline Battery Safety Management Plan (Latest Version, Revision 3 [REP3-106]) - Outline Construction Traffic Management Plan (Latest Version, Revision 4 [REP4-057]) - Outline Archaeological Mitigation Strategy (Latest Version, Revision 1 [APP-230]) - Outline Drainage Strategy (Latest Version, Revision 4, [REP4-021], [REP4-023], [REP4-025], [REP4-027], [REP4-029], [REP4-031], [REP4-033], [REP4-035]) - Outline Water Resources Strategy (Latest Version, Revision 1 [APP-290])
Articles		
DCO2.2	The Applicant	Article 2 – Interpretation Q1 National Highways [REP4-098] has requested that a definition of relevant highway authority is required to be included in the dDCO. The applicant is asked to include such a definition or explain why it is not necessary.
DCO2.3	The Applicant	Article 2 – Interpretation Q2 In response to ExQ1 DCO1.5 [REP3-128] the applicant stated that it would prepare a permitted preliminary works (PPW) plan and submit this at deadline 4. The applicant’s cover letter submitted at deadline 4 stated that the PPW plan would instead be submitted at deadline 5. The ExA requests that the first iteration of this document is submitted at deadline 5 and no later, so that there is reasonable opportunity for it to be reviewed, consulted on and updated as necessary at subsequent deadlines, and for the final version to be included as a certified document in the dDCO.
DCO2.4	The Applicant	Article 2 – Interpretation Q3 The definition of ‘maintain’ was considered in ExQ1 DCO1.3 and further discussed at ISH4. The ExA considered whether the definition should include the words ‘ <i>but not remove, reconstruct or replace the whole of the authorised development</i> ’, particularly in light of the climate change chapter 7, which confirms that there is no anticipated replacement of mounting structures, interconnecting cable, grid connecting cable, or on-site substation buildings, while only a 20% on-site cable replacement allowance has been made. The applicant’s response is that the suggested words would conflict with the intention that the scheduled replacement of all solar modules and battery energy storage system units is permitted as maintenance for this scheme. The ExA notes that the indicative design life of solar panels put forward by developers in examinations is between 25 and 40 years, while indicative lifespans of batteries is between 5 and 15 years, meaning that any scheme with a 60 year life span would need to replace both components during the lifetime of those developments. This is the case for example in The Cottam Solar Project Order 2024, The West Burton Solar Project Order 2025, and The One Earth Solar Farm Order 2026, and yet all three of those made Orders include the following definition of maintain: <i>“maintain” includes inspect, repair, adjust, alter, remove, refurbish, reconstruct, replace and improve any part of, but not remove, reconstruct or replace the whole of, the authorised development and “maintenance” and “maintaining” are to be construed accordingly;</i> The ExA therefore has difficulty understanding why the inclusion of the words ‘ <i>but not remove, reconstruct or replace the whole of the authorised development</i> ’ in the definition of ‘maintain’ for the Lime Down project is problematic. The applicant is asked to explain how this project is set apart from the three examples noted above to justify exclusion of the suggested words in the dDCO.
DCO2.5	The Applicant	Article 6 - Disapplication and modification of legislation, etc. Article 6 of the dDCO was revised at deadline 4 to include the following legislative modification:

ExQ2	Question to:	Question:
		<i>(4) Regulation 3(2) of The Environmental Impact Assessment (Agriculture) (England) (No.2) Regulations 2006 has effect as though after sub-paragraph (b) there were added— (ba) constitutes development to which the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 apply;</i> The Schedule of Changes to the dDCO (Rev 3) [REP4-075] states that this corrects an issue whereby land would become uncultivated for more than 15 years whilst used for the projects, and the EIA Agriculture Regulations do not have an equivalent exemption for DCO EIA development. Can the applicant expand on their brief justification for including this legislative modification in Article 6, to explain what implications arise if new sub-part (4) of Article 6 is not included in the dDCO? Can the applicant also advise whether it has discussed, or whether it is necessary to discuss, the insertion of sub-part (4) into Article 6 with Natural England?
DCO2.6	The Applicant	Article 7 - Defence to proceedings in respect of statutory nuisance ExQ1 DCO1.11 queried whether Article 7 was justified given the statement of the applicant in the Explanatory Memorandum that there is no statutory nuisance expected as a result of the authorised development. The applicant's response [REP3-128] stated that Section 158 of the Planning Act 2008 confers statutory authority for the carrying out of development or doing anything else authorised by the Order and that this acts as a defence in any criminal or civil proceedings for nuisance in the absence of any contrary provision in the Order. It added that <i>nuisance from noise is not anticipated from the Scheme, and is not required to be managed through the Requirements. It is therefore very unlikely that the Applicant would need to rely upon the statutory defence conferred by section 158 of the Planning Act.</i> The ExA seeks to understand from the applicant if there are any contradictions between Article 7 and the monitoring and mitigation measures included in Table 8 of the oOEMP [REP4-051], which states that <i>annual noise monitoring will be undertaken and the undertaker and relevant planning authority will then liaise in respect of any further maintenance or mitigation required to reduce levels at receptors back to those presented in the ES. Further, in the case of third-party complaints about noise, correction actions will be taken by the Environment Manager and recorded as outlined in Section 6.2.</i>
DCO2.7	The Applicant Wiltshire Council	Article 16 – Traffic regulation measures Q1 Article 16 was discussed at ISH4 in relation to whether the notice timeframes in 16(5) for carrying out any of the traffic regulation measures permitted by this Article are sufficient. As part of that discussion the applicant emphasised that the traffic regulation measures sought (such as signs or signals) have to be approved as part of the CTMP, which would occur before the notification required by 16(5). The ExA has reviewed the oCTMP and notes that paragraph 2.4.1 states: <i>Details of the form and proposed locations of any signs or signals to be placed on a public highway will be submitted to Wiltshire Council and South Gloucestershire Council in advance of being placed (either as part of the CTMP or separately).</i> In addition, paragraph 4.5.1 states: <i>Temporary road signage will be implemented along the designated routes to inform background traffic of the ongoing construction works and to direct construction traffic to and from the Site. The signs will be located at key points along the route, including junctions.</i> Neither of these paragraphs require the details of signs or signals to be approved as part of the CTMP. Furthermore, the traffic regulation measures included in Article 16 are much broader and include for example, restricting the stopping, waiting, loading or unloading of vehicles on any road, or the use of any road by vehicular or non-vehicular traffic. None of these measures are seemingly captured as matters in the oCTMP that require advance approval by the traffic authority before the powers in Article 16 can be used. The ExA notes that paragraph (4) does require the applicant to obtain the written consent of the traffic authority, which suggests that the actual detail of the traffic regulation measures sought will be through the consent process outlined in Article 47 and not through the CTMP approval process (and the Schedule 16 discharge provisions). This was touched upon in ISH4 and the applicant agreed that in theory it could apply for consent under Article 16 and the process outlined in Article 47 would apply, although it added that it could still not carry out the works because they would have to be approved under the CTMP. As highlighted above, the latter does not seem to be the case. In which case, a consent sought under Article 16 would only give the traffic authority 6 weeks to approve the detail (pursuant to Article 47) or else it would receive deemed consent. Thus, in order to pin this down and remove any potential confusion, the ExA would welcome a response from the applicant and Wiltshire Council on whether paragraph (4) should say something along the lines of: <i>(4) Before exercising the power conferred by paragraph (1) the undertaker must—</i> <i>(a) consult with the chief officer of police in whose area the road is situated; and</i> <i>(b) obtain the written consent of the traffic authority as part of the construction traffic management plan in Schedule 2, Requirement 15.</i>

ExQ2	Question to:	Question:
DCO2.8	Wiltshire Council	Article 16 – Traffic regulation measures Q2 In its post hearing submission [REP4-092] the Council maintains that the notice timeframes contained in Article 16(5) do not enable the national standard practice to be adhered to. It adds that the Council is prepared to reduce the timeframe in sub-paragraph (5)(a) from 12 weeks to 8 weeks but would not be able to comply with 4 weeks and still fulfil its statutory duties. Can the Council please explain, signposting the ExA to the relevant piece of legislation, which statutory provision would be breached if the notice period were to remain at 4 weeks?
DCO2.9	The Applicant	Article 16 – Traffic regulation measures Q3 At ISH4 Stop Lime Down suggested the insertion of an addition of a new sub-paragraph (c) to paragraph (5), which would require the applicant to display a site notice containing the traffic regulation measures on the roads affected as part of the notice period process. Stop Lime Down referred to The Springwell Solar Farm Order 2026, and transposing that provision into the Lime Down dDCO it would be drafted as follows: <i>(5) The undertaker must not exercise the powers in paragraphs (1) or (2) unless it has—</i> <i>(a) given not less than 4 weeks’ notice in writing of its intention so to do to the chief officer of police and to the traffic authority in whose area the road is situated;</i> <i>(b) not less than 7 days before the provision is to take effect published the undertaker’s intention to make the provision in one or more newspaper circulating in the area in which any road to which the provision relates is situated; and</i> <u>(c) displayed a site notice containing the same information at each end of the length of road affected.</u> The applicant is requested to apply the insertion of sub-paragraph (c) in its next revision of the dDCO or explain why it is not necessary. Stop Lime Down also requested whether a greater level of detail should be inserted into the oCTMP (if indeed the traffic regulation measures are approved as part of the CTMP, discussed in ExQ2 DCO2.7) around whether traffic regulation approvals should identify the duration of the measures being approved so as to avoid traffic disruptions for any longer than necessary. The applicant committed to exploring possible drafting on that matter, but nothing was submitted at deadline 4. The ExA requests a response on this matter at deadline 5.
Any questions relating to Articles 21 to 31, which pertain to compulsory acquisition and temporary possession are included within the Compulsory Acquisition and Land Rights (CA) section above		
DCO2.10	The Applicant	Article 40 – Felling or lopping of trees and removal of hedgerows Q1 Wiltshire Council in its post hearing submission [REP4-092] (pages 59 to 61) continues to express concern about the scope of Article 40 and Schedule 12, as well as omissions in Schedule 12 in relation to measures in the Habitats Regulations Assessment (HRA). The ExA requires the applicant to review this part of the Council’s submission and provide a full response and where necessary make amendments to the dDCO (with corresponding update to the Schedule of Changes to the Draft Development Consent Order).
DCO2.11	Stop Lime Down The Applicant Wiltshire Council	Article 40 – Felling or lopping of trees and removal of hedgerows Q2 Stop Lime Down has suggested [REP3-173] and [REP4-132] that the word ‘only’ should be inserted after the word ‘remove’ in Article 40(4), such that it would say: <i>(4) The undertaker may, for the purposes of the authorised development or in connection with the authorised development and subject to paragraph (2), remove only the hedgerows specified in the table in Part 1 and the table in Part 2 of Schedule 12 (hedgerows to be removed) to the extent set out in the ecological protection and mitigation strategy approved pursuant to requirement 8 in Schedule 2 (requirements).</i> <u>Stop Lime Down:</u> 1) Stop Lime Down are requested to explain the necessity for this insertion. <u>The Applicant and Wiltshire Council:</u> 2) The applicant and Wiltshire Council are invited to comment on the implications (if any) of this suggested insertion.
DCO2.12	Wiltshire Council	Article 41 – Trees subject to tree preservation orders Further to the discussion about this Article at ISH4, the applicant has included new notice provisions in paragraph (4) as follows: <i>(4) Notice in writing of the proposed activities authorised by paragraph (1)(b) must be given to the relevant planning authority—</i> <i>(a) in the case of activities urgently necessary to remove an immediate risk of serious harm, as soon as practicable after the activities become necessary; and</i>

ExQ2	Question to:	Question:
		<i>(b) in any other case at least five working days prior to the date on which the activities are to be commenced.</i> The Council is asked to advise if a five working day notice period in sub-paragraph (b) is reasonable. If not, explain why not and provide justification for any longer notice period sought.
DCO2.13	The Applicant	Article 47 – Procedure in relation to certain approvals etc. The ExA notes that Article 47(3) seeks only to allow the consenting authority a six-week period to determine a consent required application or else the application receives deemed consent. This was briefly discussed at ISH4 in relation to Article 10 (Power to alter layout, etc., of streets) but it has wider application to other Articles. The ExA expressed concern over the six-week period, particularly in light of local authority resourcing constraints, but notes that the timeframe has not been altered in Revision 4 of the dDCO. The ExA notes that the recently made Orders for The Springwell Solar Farm 2026 and The One Earth Solar Farm 2026 contain a similar article yet they include a longer consenting period of 10 weeks and 13 weeks respectively. The applicant is therefore asked to justify why a six-week consenting period is more appropriate for the Lime Down Solar Project.
DCO2.14	The Applicant	Article 50 – Maintenance of drainage works The ExA has been unable to find any other example of Article 50 being included in any other made solar DCO. The ExA seeks to understand the necessity for including this Article in the dDCO, for while the Explanatory Memorandum notes that an identical article has been included in three transport DCOs, that is not an explanation for its necessity in the Lime Down Solar Project Order. On the basis that there is no precedent in other made solar Orders or indeed evidence to demonstrate that its purpose was properly examined, the applicant needs to fully justify why this Article, which appears to have only been used in transport DCOs, is specifically required and should remain in the Lime Down Solar Project dDCO.
Schedule 2 – Requirements		
DCO2.15	The Applicant	Multiple Requirements – National Highways National Highways [REP4-098] has reiterated its concern that it is not named a consultee in Requirement 3, whilst also maintaining that it must be added as a consultee to Requirements 5, 7, 8, 10, 11, 13, 14, 15, 16 and 20 to protect its position. The ExA seeks to understand from the applicant what issues would arise from acquiescing to National Highways' request to be directly named in these Requirements.
DCO2.16	The Applicant	Requirement 11 - Surface and foul water drainage The Lead Local Flood Authority (LLFA) is a mandatory consultee in the approval of surface water drainage strategies for major development under the Town and County Planning Act 2015. Therefore, the ExA disagrees with the applicant's position in its rebuttal to Wiltshire Council's response to EXQ1 FHW1.20 [REP4-081] and requests that they are added as consultees or provide a robust response, supported by caselaw if needed. In addition, as the development would not lead to foul water discharge into the sewer system, should Requirement 11 be named 'Surface water drainage' only? If the answer is no, please provide reasons and add reference to the relevant foul water consultee in the Requirement (presumably Wessex Water).
DCO2.17	The Applicant	Requirement 20 - Decommissioning and restoration Q1 Notwithstanding Requirement 20(7) requiring the undertaker to notify the relevant planning authority within 28 days of any part of the authorised development permanently ceasing to be in commercial use, there is no legally enforceable requirement for that part (or parts) to be decommissioned and the land restored once it ceases to be used for the purposes of electricity generation for commercial use. Rather, Requirement 20(1)(a) as currently drafted, links decommissioning to a 60-year time period after the initial date of final commissioning, rather than the point at which any relevant part ceases to be used for electricity generation for commercial use (which may be much earlier than 60 years). Please provide alternative drafting that would ensure that there is a legally enforceable requirement for the proposed development, or relevant part of it, to be decommissioned and the land restored following all or any part of the Order land ceasing to be used for the purposes of electricity generation for commercial use at any time, or explain why this is not reasonable/ necessary. For the avoidance of doubt, the ExA is seeking to avoid a situation where an option agreement on one part of the site expires after 40 years yet the infrastructure remains non-functional on the land for a further 20 years before decommissioning commences.
DCO2.18	The Applicant	Requirement 20 - Decommissioning and restoration Q2 Further to ExQ2 DCO2.17, explain why there is no provision within the dDCO requirements for abatement of works that may become abandoned or decayed before the 60-year decommissioning time period is reached? Provide justification for why the following requirement (or similar) should not be included within the dDCO:

ExQ2	Question to:	Question:
		<i>Where the scheduled works or any part of them are abandoned or allowed to fall into decay, the Secretary of State may, following consultation with the undertaker, issue a written notice requiring the undertaker at its own expense either to repair, make safe and restore one or any of the scheduled works or any relevant part of them, or to remove them or any relevant part of them, restore the site to a safe and proper condition, to such an extent and within such limits as may be specified in the notice.</i>
DCO2.19	The Applicant	Requirement 20 - Decommissioning and restoration Q3 Wiltshire Council [REP4-092] suggests that Requirement 20 should include the requirement for a decommissioning phasing timetable and plan to be submitted to and approved by the planning authority, rather than just submitted to it. This would necessitate a revision to paragraphs (2), (3) and/ or (4). The Council also suggests that a new paragraph should be included in the Requirement indicating that the decommissioning report and certificate of completion should be submitted to the local planning authority for approval. The ExA considers that there is merit in these suggestions and therefore requests the applicant's consideration of them, and a justification if it does not wish to take the insertions forward.
DCO2.20	The Applicant	Proposed New Requirement – Register of Requirements The ExA considers that it would be prudent for the applicant to maintain on a dedicated website a Register of Requirements to alert the general public, Parish Councils, community and/ or other stakeholders to the status of the control documents and to allow visibility of the approved documents. This is particularly important given the number of documents which require local planning authority approval, and given that several versions of the documents may be submitted to reflect a phased construction approach or a site by site approach. This type of requirement has precedent in The A122 (Lower Thames Crossing) Development Consent Order 2025 (Requirement 24). A link to National Highways' online register is here for example. The ExA considers that this would assist the local planning authority in terms of managing public, Parish Council and consultee contact and/ or any complaints before and during the construction phase; it would also assist the Community Liaison Group (CLG) which would be established pursuant to Requirement 4 of the dDCO. The ExA requests the applicant's consideration of this suggested new Requirement and welcomes the submission of draft wording, or a justification if it does not wish to take the Requirement forward.
Schedule 13 – Documents and Plans to be Certified		
DCO2.21	The Applicant	Missing Documents The applicant is asked to review Schedule 13 to ensure that it is accurate. The ExA notes that ES Chapter 8 – Landscape and Visual [REP3-025], ES Chapter 10 – Arboriculture [APP-062], ES Appendix 10-1 [APP-206] for example, are missing from the Schedule, but other documents may also be missing.
Schedule 14 – Arbitration Rules		
DCO2.22	The Applicant	Confidentiality Clause in Arbitration Rules The applicant is required to justify the confidentiality clause included in Schedule 14 of the Arbitration Rules. The ExA notes that the drafting is notably different to that used in several recently made Orders, not least The One Earth Solar Farm Order 2026, The Springwell Solar Farm Order 2026, The Peartree Hill Solar Farm Order 2026 and The West Burton Solar Project Order 2025. The applicant should therefore explain why confidentiality is necessary for materials, documents, awards, expert reports and any matters relating to any future arbitration in this case, and what sets the Lime Down project apart from those other cases.
Schedule 15 – Protected Provisions		
DCO2.23	All Statutory Undertakers Wiltshire Council	Status and Proposed Revisions As per the examination timetable, all Statutory Undertakers and Wiltshire Council are requested to submit their proposed version of protective provisions that they wish to see included for their benefit in the dDCO but have not been agreed by the applicant. Please also set out why you are not content with the applicant's version in Schedule 15 of Revision 4 of the dDCO [REP4-004], and explain why the ExA and Secretary of State should prefer your suggested drafting.
DCO2.24	The Applicant Wiltshire Council	Protected Provisions for The Local Highway Authority The ExA acknowledges the submission of draft protected provisions for the local highway authority from the applicant [REP4-004] and Wiltshire Council [REP4-092]. From a review of the drafts, the ExA notes for example (but not least) that the definition of “the bond sum” and “the commuted sum” are different between the two versions, while the “estimated costs of works” definition provided by the Council has not been included in the applicant's version.

ExQ2	Question to:	Question:
		The ExA also notes that in the applicant's definition of "the bond sum", sub-paragraph (c) refers to National Highways, when it should refer to the local highway authority. <u>The Applicant:</u> The applicant is required to identify for the ExA all variances between the two versions and advise what discussions are taking place to resolve these variances. The ExA appreciates that prior to deadline 5 the drafting of the protected provisions for the local highway authority may evolve, such that a revised version of the provisions may be submitted into the examination, but it would nonetheless be helpful to the ExA for the variances from the Council's version to be clearly identified, explained and justified. The applicant is also asked to explain whether any revisions are required to the drafting of Articles 8 to 16, or Requirement 15 (or the oCTMP) in light of these protected provisions. The ExA is seeking to be absolutely clear on whether Article 47, Schedule 16 or the protected provisions take priority in the consent/ approval arrangements contained within Articles 8 to 16 and Requirement 15. <u>Wiltshire Council:</u> Wiltshire Council is also invited to make submissions if required.
DCO2.25	The Applicant National Grid Electricity Transmission Plc	Protected Provisions for National Grid Electricity Transmission Plc (NGET) In response to ISH4 Action Point 9 [REP4-087] the applicant provided a summary of negotiations with statutory undertakers on protected provisions. The ExA notes the applicant's update that it is liaising with NGET over protected provisions on another DCO application (Green Hill Solar Farm) and is looking to replicate the provisions to be agreed for that project. However, the examination for Green Hill Solar has closed and is in decision phase, so if negotiations on protected provisions for that scheme are still ongoing, the ExA assumes that those provisions were not agreed for that project before the close of that examination. The ExA is concerned that negotiations with NGET on provisions for Lime Down are paused because even if provisions for Green Hill Solar are agreed before the close of the Lime Down examination there still needs to be time to make bespoke changes for this project. Notwithstanding ExQ2 DCO2.23 above, the ExA would welcome an honest and realistic position from the applicant and NGET on the likelihood of agreeing protected provisions for Lime Down before the anticipated close of this examination on 21 October 2026, particularly in light of NGET's submissions at deadline 3 [REP3-148] and [REP3-149], which stated that discussions on the protective provisions are at an early stage.
DCO2.26	The Applicant	Protected Provisions for the Environment Agency The Environment Agency (EA) [REP4-097] (Ref EA-012) notes the applicant has made some amendments to its standard protective provisions regarding flood risk activity permits in the dDCO. The EA do not agree to the proposed amendments. The applicant is asked to explain why the standard protective provisions have not been used and why the ExA and the SoS should prefer your suggested drafting.
DCO2.27	The Applicant National Highways	Protected Provisions for National Highways In response to ISH4 Action Point 9 [REP4-087] the applicant provided a summary of negotiations with statutory undertakers on protected provisions. The ExA notes the applicant's statement that it is confident that protected provisions with National Highways will be agreed prior to the close of the examination. However, National Highways in its deadline 4 submission [REP4-098] states that <i>whilst National Highways is content in principle with the protected provisions and Side Agreement reflecting the position agreed at Green Hill, National Highways has made it clear to the Applicant that there are scheme specifics that need to be agreed before NH is in a position to formally agree the PP's. Following NH's in principal approval, progress with the Applicant on requirements has been minimal</i> (ref NH-007). Notwithstanding ExQ2 DCO2.15 and DCO2.23 above, the ExA would welcome an honest and realistic position from the applicant and National Highways on the likelihood of agreeing protected provisions for Lime Down before the anticipated close of this examination on 21 October 2026, particularly noting the absence of any updates to the SoCG since deadline 2 [REP2-030].
Schedule 16 - Procedure for Discharge of Requirements		
DCO2.28	The Applicant Wiltshire Council	Fees Q1 Schedule 16(5) relates to fees associated with the discharge of the dDCO requirements. Can the applicant explain how it has arrived at the fees quoted in sub-paragraph (2)(a) to (c) and why there is no provision for increasing these fees in line with any uplifts in line with the Consumer Prices Index for example? The ExA is aware that the Government recently published its response to the Fees for Planning Applications Consultations, which includes consideration of local authorities being able to set their own fees locally to meet their actual costs. The ExA is therefore seeking to understand from the applicant how it has arrived at the fee sums included in Schedule 16(5)(2)(a) to (c) and whether this has involved any discussion and agreement with Wiltshire Council.

ExQ2	Question to:	Question:
		Wiltshire Council is also invited to comment.
DCO2.29	The Applicant	Fees Q2 Schedule 16 paragraph (5)(2)(d) was inserted into Revision 3 of the dDCO [REP3-005], however the ExA notes that no explanation for this insertion was provided in an updated Explanatory Memorandum. While it seems to explain how the fees have been set in sub-paragraph (2)(a) to (c), it appears to only to reference applicability to Requirement 20 (decommissioning and restoration). The ExA is confused as to why that is the case. The ExA requests that the applicant reviews paragraph 5(2)(d) and provides an explanation for its insertion and what it is seeking to achieve.
Ecology and Biodiversity (EB)		
EB2.1	Natural England The Applicant	Livestock and 400kV Cable Depth <u>Natural England:</u> 1) The ExA asks that Natural England provide advice on the minimum depth a 400kV cable should be buried across farmland, whether used for livestock grazing or arable activities, to avoid adverse effects on agricultural practice. <u>The Applicant:</u> 2) Confirm the absolute minimum depth the 400kV cable will be buried below ground level throughout the Order limits and explain what efforts will be made to avoid the effects of electromagnetic fields on agricultural practice.
EB2.2	The Applicant	Existing Buildings Section 6.3 of the outline Ecological Protection and Mitigation Strategy (oEMPS) [REP3-102] states that <i>in the event that construction works require trees or buildings to be impacted, altered or removed, these will be thoroughly inspected by a suitably qualified (and licensed, in the case of bats) ecologist in advance</i>. However, in response to ExQ EB1.15 [REP3-128], the applicant states that <i>all existing buildings with the potential to support nesting birds and/or roosting bats are proposed to be retained</i>. In light of the applicant's response to ExQ EB1.15, it is unclear how the buildings proposed for retention have been identified within the application documents and how their retention would be secured through the DCO given the flexibility provided in the oEMPS. The applicant is requested to clarify the approach to the retention of existing buildings with the potential to support nesting birds and/or roosting bats, and to identify these buildings in the oEMPS and any other relevant control or certification documents, as appropriate.
EB2.3	The Environment Agency (EA) The Applicant	Riparian Species <u>The Environment Agency:</u> 1) The EA's deadline 4 submission [REP4-097] confirms that spot checks undertaken by the applicant were not done as per Chartered Institute of Ecologists and Environmental Managers (CIEEM) guidelines. If the applicant adopted the 10m watercourse buffer would this overcome the EA's concerns regarding the survey work. 2) If this approach would not address the EA's concerns, please provide any further comment regarding the potential adverse effects on riparian species that could be caused by the applicant's approach, considering the applicant's justification in [REP4-086]. <u>The Applicant:</u> 3) Given the concerns raised by the EA regarding the spot checks methodology, can you confirm that you would provide for a 10m watercourse buffer throughout the Order limits to reduce the potential effects. Please note that your response could impact your reply to ExQ EB2.13.
EB2.4	The Applicant Natural England	Great Crested Newts (GCN) <u>The Applicant and Natural England:</u> 1) The ExA is in receipt of the District Level Licence Impact Assessment and Conservation Payment Certificate for the CRC [REP2-041]. However, the ExA are not clear on Natural England's position with respect to GCN in the solar PV sites despite the wording of the SoCG [REP4-063] 3.3.16 and that it is now 'Agreed'. The wording of this is unclear and both the applicant and Natural England are requested to provide a clear explanation of the current position. <u>Natural England:</u> 2) Please provide a response to the concerns raised by Wiltshire Council regarding GCN in their deadline 4 submission [REP4-091], reference EB1.7.

ExQ2	Question to:	Question:
EB2.5	Wiltshire Council	White-Clawed Crayfish The ExA notes Wiltshire Council's position in the SoCG item 3.5.20 [REP4-061] and it is now an 'Agreed' item. The Council is asked to explain its position given the potential conflict between maintaining its concerns over the lack of survey work and the wording of [REP4-091], pages 39 – 40. This raises question marks over whether this should be an 'Agreed' item. Further to this, should the applicant commit to a 10m buffer to all watercourses, the Council is asked to comment if this would address its concern over a lack of survey work.
EB2.6	Stop Lime Down	Brown hare In Stop Lime Down's WR Appendix E paragraph 39 [REP1-173] you state that brown hare enjoys open fields, but the applicant provides no mitigation, so you question the potential impact on brown hares. In the applicant's response to ExQ1 EB1.12 [REP3-128], it comments that the security fencing is large enough to allow the passage of brown hare. You are asked to consider if this resolves your concerns and if not, what further mitigation would you expect to avoid impact on brown hare. If your position is that there is no possible mitigation, then please provide an explanation.
EB2.7	The Applicant	Skylark/ Nesting Birds Mitigation Areas The applicant is asked to respond to each of the following questions regarding ground nesting birds. 1) Confirm that areas of mitigation are secured for the duration of the proposed development, and if not for a period of 60-years, how long. If the answer is less than 60-years how has this been accounted for within the ES. 2) In its response to ExQ1 EB1.18 [REP3-142], Wiltshire Council commented that hedgerows being kept at 4.5m in height has the potential to reduce open sight lines and increase predation thus reducing suitability of habitat for ground nesting birds. The applicant is asked how it has considered the effect of hedgerow heights when weighing effect of the proposal on skylark and the effectiveness of the mitigation areas. As per the Council's suggestion, please detail why these hedgerows cannot be kept to a lower height to maximise the benefits of the mitigation areas, especially considering the adverse effect on skylark detailed in ES Chapter 9 [REP4-010]. In answering this ExQ the applicant is asked to weigh the potential ecology benefits against the landscape and visual effect of a lower hedgerow height at the ground nesting bird mitigation areas.
EB2.8	Natural England The Applicant	Barn Owls/ Nesting Birds/ Overwintering Birds <u>Natural England:</u> Please provide comment on the applicant's approach to avian species including barn owls, nesting birds and overwintering birds with respect to survey methodology and results, or lack thereof. Specifically, the ExA request that you consider the applicant's approach in the CRC of assuming the presence of species, as opposed to undertaking species surveys. You are also asked to consider the merits of the applicant's approach in the control documents relating to avian species. In providing your response you are invited to review the contents of the applicant's Statement of Common Ground (SoCG) with Wiltshire Council [REP4-063] sections 3.5.18 and 3.5.19. <u>The Applicant:</u> You are asked to clarify table 3 of the oCEMP [REP4-049] and whether you will seek to undertake works outwith seasonal sensitivities for avian species before considering forms of mitigation and, if so, how this will be controlled and monitored and what this might mean for the overall construction timetable. Equally, if you consider that works within seasonally sensitive times is appropriate, please provide a justification and how your approach would be consistent with the mitigation hierarchy. **In answering this question, the applicant and Natural England are requested to consider whether the response should be kept confidential under Regulation 12(5)(g) of the Environmental Information Regulations 2004. If that is the case both parties are requested to provide a copy of their confidential response directly to Wiltshire Council, Natural England and the applicant at deadline 5, as appropriate. When submitting the response to the Planning Inspectorate, it should be redacted and marked appropriately, with a separate confidential unredacted copy issued for ExA eyes only.**
EB2.9	The Applicant	Socio-Economic/ Ecology – Agri-Environment Schemes The applicant's response to ExQ1 EB1.4 only refers to land in the solar PV sites [REP3-128]. The original question requested details across the entire Order limits. It has now come to light that works in the CRC could have an adverse effect on agri-environment schemes.

ExQ2	Question to:	Question:
		For example, [REP4-120] and [REP4-115] demonstrate concern that the laying of the cable could have an adverse effect on an extant agri-environment scheme meaning the landowner may not be able to meet their obligations. If the proposal adversely affects a landowner or farming tenant's ability to meet requirements of an agri-environment scheme or similar how has this been considered within the applicant's assessment in terms of establishing baseline and quantifying the effects of the proposed development. In providing a response the ExA also requests that the applicant provides a separate comment from a socio-economic perspective and how the potential impact on agri-environment schemes adversely affects existing businesses.
EB2.10	The Applicant	National Forest Designation Relevant representation [RR-0007] raised specific concerns over how the proposal meets the terms of the National Forest designation. The applicant is asked to respond.
EB2.11	The Applicant	Hedgerow Removal 1) The applicant is requested to update the Hedgerow Removal Plan within Annex A of the oEPMS [REP4-055] with reference to the maximum <u>and</u> minimum extents of removal at each location. The applicant should provide a clear commentary as to the control measures that ensure that it is not just assumed to remove the maximum extent of hedgerow at any given location. 2) The applicant is also requested to detail on the Hedgerow Removal Plan of the oEPMS [REP4-055] where hedgerows will not be replaced. 3) In addition to the above, the applicant is requested to update the relevant control documents, including the oCEMP [REP4-049] and oCTMP [REP4-057], to reflect the response to part 1) above.
EB2.12	The Applicant	Biodiversity Net Gain (BNG) To ensure that there is no double counting of BNG, and confusing this with mitigation, the applicant is requested to provide additional clarification as to which measures/ proposed habitat creation fall within each of the relevant categories. To ensure clarity and future ease of monitoring you are requested to provide this information in a single document that details: • the type and quantum of habitat types that are being lost and the type and quantum of habitats and measures for species that are being replaced/ developed, and • state where these new sites will be (field numbers, for example), and whether this will represent mitigation, compensation, enhancement or BNG. For linear features such as hedgerows this information should, as far as possible at this stage, be broken down into figures for each individual length of hedgerow that is proposed to be removed and figures for what is proposed to be re-planted at the original location or to be compensated for with planting elsewhere. Whilst the ExA appreciates that the full details might not be available until the detailed design stage, the applicant is requested to provide its best estimate prior to detailed design, based on what has been assessed in the ES. The ExA considers that a table format would best present this information.
EB2.13	The Lead Local Flood Authority The Applicant	Ordinary Watercourse Buffers <u>The LLFA:</u> The EA's post-hearing submission [REP4-097] provides details of why a 10m buffer from the bank top of sensitive watercourses is appropriate. However, they defer to the LLFA for ordinary watercourses. Please confirm your expectation with respect to buffers to protect ordinary watercourses. <u>The Applicant:</u> The applicant is asked to justify why it considers a lesser buffer of 8m is acceptable, especially given its approach to assume the presence of protected species in each habitat type and the position of the EA as per the post-hearing submission [REP4-097]. This should provide further detail to the post-hearing submission [REP4-086].
EB2.14	The Applicant Natural England Wiltshire Council	Mitigation Hierarchy <u>The Applicant:</u> The applicant's approach to species in the CRC assumes the presence of species and intends to rely on mitigation to avoid harm such as pre-construction surveys to inform the cable installation route. Given the assumption of the presence of species the applicant is asked if it would commit to out of season works in relation to those protected species where they have assumed presence, unless otherwise agreed with Wiltshire Council in consultation with Natural England to an alternative.

ExQ2	Question to:	Question:						
		If the applicant is minded to agree to this approach, then it should update the relevant control documents accordingly beyond that already specified in table 3 of the oCEMP [REP4-049]. It should also provide details of those months where types of works will be avoided to protect the assumed presence of protected species. It is noted that the SoCG with Natural England confirms this approach for hedgerow removal to protect dormice [REP4-063], and the SoCG with the EA regarding coarse fish spawning [REP4-068]. <u>Natural England and Wiltshire Council:</u> Should the applicant agree to the above avoidance measure to protect ground nesting birds and other assumed presence of protected species do you consider that this would avoid any Likely Significant Effects (LSE) and meet with the terms of the mitigation hierarchy? If not, please provide details.						
EB2.15	Wiltshire Council	Wiltshire Council Concerns Wiltshire Council is requested to provide a summary of outstanding ecology concerns that relate to each element of the proposal in a table that highlights matters in the solar PV sites and/ or the CRC. A suggested layout is provided below: <table><tr><th>Outstanding Issue (brief summary/ headline issue)</th><th>Solar PV Sites</th><th>Cable Route Corridor</th></tr><tr><td></td><td></td><td></td></tr></table>	Outstanding Issue (brief summary/ headline issue)	Solar PV Sites	Cable Route Corridor			
Outstanding Issue (brief summary/ headline issue)	Solar PV Sites	Cable Route Corridor						
EB2.16	The Applicant	Access Points – Mitigation Measures ExQ1 EB1.20 [PD-010] asked the applicant: <i>Works Plan Sheet 9 [REP1-005] shows an access into Works Number 5A(v) via access number 102 [APP-010]. Although this is an existing access it needs to be improved to cater for construction traffic, which would result in the removal of hedgerows, dry stone walling and a mature tree.</i> <i>You are asked to detail what design alternatives were considered to avoid and reduce damage to ecologically important features at this access, for example could access 101 have been used to allow for a turning area into 102 to avoid damage to ecological features? Furthermore, you are asked to detail your approach, with reference to the mitigation hierarchy and providing evidence, to selecting areas for construction compounds and access points generally, including widening and other works, to avoid and minimise damage at these locations to ecologically sensitive features.</i> The applicant provided a general overview of its approach to the design of access points but did not explain how individual accesses had been designed to avoid impacts on important ecological features, beyond stating that existing access points would be used where possible. In relation to access points 101 and 102, shown on Works Plan Sheet 9 [REP1-005], the applicant did not provide details of any alternative access arrangements considered to minimise or avoid the loss of trees and hedgerows. The applicant is therefore requested to provide further information on the design process used to avoid or minimise impacts on key ecological features when designing new access points or widening existing accesses. This should demonstrate that site-specific design considerations have been applied and that opportunities to avoid ecological impacts have been fully explored. In addition, the applicant is requested to provide a detailed explanation of the design approach for access points 101 and 102, including any alternative options considered and the measures taken to avoid or minimise the removal of trees, hedgerows and other ecological features.						
EB2.17	The Applicant Wiltshire Council	Ancient Woodland – Surrendell Wood The applicant's deadline 4 response to ISH3 Action Point 21 [REP4-086] refers to the use of an existing track that encroaches within the 15m buffer to Surrendell Wood. The ExA notes the applicant's position that use of the existing track would be less environmentally intrusive than the construction of a new access route. <u>The Applicant:</u> The applicant is requested to provide further evidence supporting this conclusion, including details of any surveys, assessments, existing levels of vehicular use, or other information relied upon in selecting this approach. The applicant should also explain how any potential effects on the ancient woodland would be monitored during construction and operation, and what mitigation measures would be implemented should adverse effects be identified. <u>Wiltshire Council:</u> Having regard to the applicant's deadline 4 response to ISH3 Action Point 21 [REP4-086], the Council is requested to set out its position on the proposed use of the existing access track within the 15m buffer to Surrendell Wood. In particular, the Council should identify:						

ExQ2	Question to:	Question:
		- its specific concerns regarding use of the existing track; - whether it agrees that use of the existing track would be less intrusive than the creation of a new access route; and - any additional mitigation, monitoring or controls that it considers necessary.
EB2.18	The Applicant Wiltshire Council	Trenchless Techniques – Protection of Root Systems and Soil Structure National Highways response to ExQ1 NH-008 [REP4-098] refers to concerns regarding the depth of trenchless techniques and the potential to damage root systems and/ or soil structure with respect to trees reference N/TPO7. National Highways remains unconvinced by the details of the applicant's approach and therefore considers these trees should form part of Schedule 12 of the DCO. <u>The Applicant:</u> You are requested to address National Highways' concerns regarding the proposed use of trenchless techniques in the vicinity of trees N/TPO7. Please identify: - the proposed minimum depths and offsets from root protection areas - the assessment undertaken to demonstrate that roots and soil structure will not be adversely affected - the management documents in which these controls would be secured - whether any amendments to dDCO Article 41, Schedule 12, or relevant management plans are proposed to address National Highways' concerns. <u>Wiltshire Council:</u> Although trees N/TPO7 are located on National Highways land, please provide your professional opinion on whether the applicant has demonstrated that the proposed trenchless techniques generally across the Order limits would avoid unacceptable impacts on tree root systems and soil structure. If not, please specify: - what additional information is required - whether additional mitigation or controls should be secured - the mechanism by which such controls should be secured - any revised drafting considered to be necessary to the dDCO.
Flood Risk, Hydrology and Water Resources (FHW)		
FHW2.1	The Applicant	Surface Water Assessment - Fluvial and Surface Water Flood Risk Maps As a result of ExQ1 FHW1.3 the applicant reviewed the Fluvial and Surface Water Flood Risk maps (included as ES Volume 2 Figures 11-1 to 11-7) [REP3-027] to [REP3-033] and outline drainage strategies (included as ES Volume 3, Appendices 11-2 to 11-8) [REP4-021] to [REP4-036]. After reviewing the information submitted, the ExA requests the applicant to: 1) Show how existing drainage features, ditches, watercourses, overland flow routes and proposed drainage measures relate to the fixed or committed Scheme infrastructure. Although the presence of ditches has been referenced in the outline drainage strategies they have not been included in the maps to provide a clear understanding of their interaction with other hydraulic features. The applicant should correct this and include them. 2) Show the indicative orientation and size of the proposed PV panels. 3) Ensure that the number of conversion units/ substation switch rooms shown in the maps correlate to those in the outline drainage strategies. 4) Include the substation for Lime Down A. 5) Show clearly the location and extent of the access tracks that require formal attenuation.
FHW2.2	The Applicant The Lead Local Flood Authority	Surface Water Assessment - Outline Drainage Strategies The outline drainage strategies and covering report are included in the ES Volume 3 (Appendices 11-2 to 11-8 [REP4-021], [REP4-023], [REP4-025], [REP4-027], [REP4-029], [REP4-031], [REP4-033], [REP4-035]). Within the site-specific outline drainage strategies, the applicant analysed and quantified surface water run-off arising from the introduction of infrastructure (substations, conversion units, distribution switch rooms and some access tracks). After reviewing the information submitted, the ExA requests the following changes to the outline drainage strategies. <u>The Applicant:</u> 1) The applicant explains in the strategies that <i>Internal access tracks within the Solar PV Panelled Areas will be formed using permeable materials and, where practicable, maintained at existing ground levels. These tracks are not treated as positively drained hardstanding surfaces requiring formal</i>

ExQ2	Question to:	Question:
		<i>attenuation, except where specifically and conservatively assessed within this Outline Drainage Strategy, such as the 132kV Substation access track.</i> The applicant should explain in the strategies the differences between the access tracks to understand the reasons and the location of those requiring formal attenuation and those which would not. If this is due to soil compaction, the relevant environmental management plans should be reviewed to include reference to these access tracks and ensure that appropriate management and mitigation are in place for the lifetime of the development. 2) Include the correct number of conversion units/ sub distribution switch rooms for each plot in table 1 of the outline strategies. This should be corrected in the calculations and reflected within the body of the text and tables within the strategies. The applicant should ensure that the way information is presented is correct within the strategies and aligned with the information shown in all the strategies. 3) Table 2 of the strategies does not include the 1% Annual Exceedance Probability (AEP) plus 45% climate change event rates which is referred under the 'Extreme rainfall' section of the strategies. In some strategies, the table does not show the 1 in 100year (yr) run-off rates. Therefore, table 2 of all strategies should be reviewed and updated to show the discharge rates of all events (1 in 2yr, 1 in 30yr, 1in 100yr, 1in 100yr plus 45% climate change, 1 in 2 yr +30% betterment), the proposed discharge rates and attenuation volumes. 4) The applicant is asked to review the 'required additional depths' for the conversion unit/ sub distribution switch rooms included in the 'Everyday Rainfall' section of the strategies as some appear unusual. Also ensure that the contributing area includes all the units to ensure consistency between strategies. Some strategies add the area of all units whereas others show only one unit. 5) The Causeway Flow hydraulic calculations are included in Appendix E of the strategies. However, some strategies do not show all elements assessed and, in most cases, the dimensions and estimated required volumes are not clear in the calculations. Therefore, Appendix E should be reviewed in all strategies to ensure that it contains the calculations for all the elements assessed, their correct dimensions and the estimated required volumes. Please ensure that the dimensions and estimated required volumes are highlighted within the calculations. 6) Some strategies contain an appendix showing sustainable drainage systems (SUDS) maintenance schedules and others do not. Please ensure consistency between strategies. 7) The applicant committed in [REP3-128] to provide conceptual drainage layouts for the BESS and substation locations by deadline 4. The outline drainage strategy for Lime Down D [REP4-031] does not include a figure showing the conceptual drainage layout. This should be added. 8) The ExA asked the applicant in EXQ1 FHW1.16 to consider the use of rainwater harvesting. We note that, although the applicant has included references to rainwater harvesting in the drainage strategies, they are considered as unsuitable in Table 3. The ExA understands that it cannot be used as the sole means of disposal of excess water, however, it may be used in combination with other SUDS, to water new planting, to support fire water replenishment, etc. Can the applicant consider this and provide a response? <u>The LLFA:</u> 9) The applicant explains in the outline drainage strategies that surface water run-off will be discharged at controlled rates in line with greenfield runoff principles and the LLFA requirement for 30% betterment. Table 2 of the drainage strategies shows that the 30% betterment is calculated using the 1 in 2yr event. Can the LLFA please confirm agreement with the events assessed and the proposed betterment? 10) Can the LLFA consider if the proposed attenuation volumes are likely to be achieved through the proposed SUDS? This is particularly relevant for Lime Down D as the volume to be attenuated is large. The LLFA may want to liaise with the relevant Wiltshire Council ecology colleague to understand how SUDS may interact with the proposed ecological enhancements.
FHW2.3	The Environment Agency The Lead Local Flood Authority	Flood Risk Assessment – Hydraulic Modelling The EA, in its hearing submission [REP4-097], explains that for Lime Down D modelling there are unresolved issues regarding the data used and missing information and requests further information from the applicant. The applicant submitted at deadline 4 the hydraulic modelling report for Lime Down E2 [REP4-089]. <u>The Environment Agency:</u> 1) Can the EA confirm if all the required further information for Lime Down D modelling has been submitted? 2) Can the EA please provide an update of the review of the hydraulic modelling for Lime Down E2 at deadline 5 confirming if further information is required and highlighting any significant issues found? <u>The LLFA:</u>

ExQ2	Question to:	Question:
		3) Considering the EA response to ExQ1 FWM1.4 (2) [REP3-146], the outputs from the applicant's Gauze Brook and Rodbourne Brook modelling which include the 3.33% AEP scenario and the evidence presented by the Stop Lime Down report [REP1-176], does this information support an extension to Flood Zone 3b in Lime Down D? If so, to which fields? 4) If your response to question 3 is positive, please explain any potential impact on the sequential and exception tests results. <u>The LLFA:</u> In your response to ExQ1 FHW1.12 [REP3-142] in relation to an ordinary watercourse running between the fields D22 and D1 you requested the applicant to: • Undertake targeted topographic and channel survey of the watercourse corridor. • Provide proportionate hydraulic assessment (or equivalent evidence) to define flood extents, depths, and flow routes. • Demonstrate that the layout maintains conveyance, including appropriate stand-offs and no obstruction of flow paths. • Confirm how the watercourse will be protected and managed. • Address any consenting requirements for works affecting an ordinary watercourse. 5) Considering the modelling provided for Lime Down D and its review by the EA, is your response to ExQ1 FHW1.12 still relevant or do you consider that the available information and the applicant's existing commitments will suffice?
FHW2.4	The Lead Local Flood Authority The Applicant Stop Lime Down	Flood Risk Assessment – Freeboard Allowance The applicant explained in its response to ExQ1 FHW1.5 [REP3-128] that the <i>Manning calculations (...) were used to compare the assessed 1% AEP plus climate change levels with the conservative 0.1% AEP surface water mapping used for context, to understand local drainage pathways and to inform the micro-siting of infrastructure. (...) Manning calculations did not identify locations where the smaller ordinary watercourses or land drainage features would give rise to a significant flood risk to the Scheme, or where the Scheme would be likely to increase off-site flood risk through displacement of floodwater or interruption of existing flow routes. They also informed the micro-siting of infrastructure by helping to identify local flood flow pathways, indicative flood levels and areas where infrastructure should be avoided or managed through embedded mitigation. They were not intended to be a full dynamic hydraulic model of the catchments.</i> The EA in its response to [REP3-146] agreed that the Manning Calculations had limitations but were useful to contextualise the 0.1% AEP extent of the Risk of Flooding from Surface Water (RoFSW) mapping. RoFSW mapping was used by the applicant as a proxy to understand fluvial flood risk from smaller ordinary watercourses due to the lack of information available. The EA considered that the assessment was proportionate. To address any uncertainty arising from the assessment the EA requested from the applicant a commitment to ensure 0.6m freeboard above the design flood event for any solar PV panels placed in areas of flood risk. <u>The LLFA:</u> 1) Considering your response to ExQ1 FHW1.5 [REP3-142] and the EA conclusions, can you please confirm agreement or otherwise with the EA conclusions regarding the Manning calculations and freeboard allowance commitment? <u>The Applicant:</u> The applicant confirmed in [REP3-128] that <i>(...) sensitive electrical infrastructure within areas of modelled flood interaction will either be located outside the design flood extent or raised with a minimum 0.6 m freeboard above the design flood level, including climate change. For Solar PV Panels, sensitive electrical equipment mounted on the panels will also be set no less than 0.6 m above the design flood level, including climate change. The lowest leading edge of the panel itself is not sensitive electrical equipment and may sit lower, depending on the final fixed or tracker arrangement.</i> The EA required further clarity from the applicant regarding the freeboard applied to the lowest leading edge of the solar PV panels above the design flood level to ensure operability during a flood event for both Lime Down D and Lime Down E2 [REP4-097]. 2) Can the applicant provide the clarity requested by the EA? Please also consider the design parameters and any potential Landscape and Visual impacts in your response. <u>Stop Lime Down:</u> 3) Given your post hearing submission [REP4-132] please provide concise comments on the issues discussed above.

ExQ2	Question to:	Question:
FHW2.5	The Applicant	Flood Risk Assessment – Compensatory Flood Storage The EA [REP4-097] explains (issue EA-073) that <i>If it is not possible to locate the substation within Lime Down C1 outside of the mapped flood flow routes, further assessment will need to be undertaken at detailed design to determine if the placement of the substation within Lime Down C1 would increase flood risk elsewhere. If there is an increase to flood risk elsewhere, floodplain compensation will be provided, in consultation with the Environment Agency, to ensure that there is no increase in flood risk.</i> To address this the EA requests a new flood mitigation Requirement in the dDCO to provide an assessment of flood risk and a mitigation plan once the location of the substation has been confirmed. <u>The Applicant:</u> The ExA notes your response to question ExQ1 FHW1.12 [REP3-128] explaining that the preferred solution is avoidance through micro-siting and, if not practicable, to use detailed design to maintain conveyance and storage so there is no increase in flood risk elsewhere. 1) Can the applicant confirm if the substation within Lime Down C1 will be located outside the mapped flood flow routes? If so, please provide a full explanation and how it will be secured through the DCO. 2) Provide a comment regarding the need for the flood mitigation Requirement and its wording.
FHW2.6	The Lead Local Flood Authority	Flood Risk Management – Cable Route The ExA notes the LLFA's response to ExQ1 FHW1.6 [REP3-142] which requests further detail secured through method statements such as HDD, trenching controls, and drainage management plans. The SoCG [REP4-061] shows that Wiltshire Council is still negotiating with the applicant HDD commitments and HDD approval. The LLFA provided a helpful update at deadline 4 [REP4-091] showing the residual themes that need to be addressed and the overall position. However, this document does not include specific references to HDD, trenching controls and drainage management plans in relation to hydrology. The ExA notes the applicant's response [REP4-081] which refers to pre-construction surveys, addressing issues through the Water Management Plan (WMP), which is part of the oCEMP and the outline Soil Resources Management Plan (oSRMP). The applicant made changes to Table 5 of the oCEMP [REP4-049] to include the protection of agricultural field drains (although a question about that has been put to the applicant in ExQ2 CA2.8(4)). Can the LLFA please provide an update on this issue?
FHW2.7	The Environment Agency The Lead Local Flood Authority	Construction – Impacts on Flood Risk and Drainage The EA requests in [REP4-097] (issue EA-051) a commitment to placing all construction compounds, material storage and plant outside of flood zone 3b and more detail about the mitigation to be implemented if compounds need to be located within the floodplain. The LLFA in [REP4-091] identifies the following issues as hydrology matters currently unresolved (noting that some of those issues can arise at other phases of the development, not just during construction): • <i>whether temporary drainage and sediment control measures during construction will be sufficiently robust;</i> • <i>whether watercourse buffers and low-lying drainage pathways will be protected in practice;</i> • <i>whether site-specific hydrological sensitivities identified in the Lime Down A-E desk studies are translated into monitoring and management controls;</i> • <i>whether monitoring arrangements include clear triggers, responsibilities, reporting and corrective actions.</i> The oCEMP [REP4-049] includes a commitment in Table 5 to locate materials and compounds outside flood zone 3b and there is reference to monitoring requirements. Some of the other issues raised (temporary drainage, buffers) are also included in Table 5 either as standalone or as part of the WMP. <u>The EA and the LLFA:</u> Can you provide any further wording that you require in the oCEMP or other dDCO documents to address the impacts of construction on flood risk and drainage?
FHW2.8	The Applicant The Lead Local Flood Authority The Environment Agency Stop Lime Down	Construction – Water Management Plan The applicant in its rebuttal to Wiltshire Council's response to ExQ1 FHW1.9 [REP4-081] indicates that <i>The Water Management Plan forming part of the detailed CEMP will provide the phase-specific construction drainage and exceedance arrangements. It will identify:</i> • <i>the existing drainage features and overland flow routes relevant to the construction phase;</i> • <i>the proposed temporary drainage and runoff controls;</i> • <i>the routing of flows exceeding the capacity of temporary drainage measures;</i>

ExQ2	Question to:	Question:
		- the interaction with compounds, haul routes, stockpiles, excavations and watercourse crossings; and - the measures required to maintain existing floodplain capacity and avoid diversion of flows towards sensitive receptors. Some of the issues mentioned in the bullet points above are not included in the latest oCEMP [REP4-049]. <u>All parties:</u> - Given that the WMP is going to be an important management plan for the duration of this project (and also referred to in the oOEMP and the outline Decommissioning Strategy (oDS)) is it still adequate that it is approved through these documents, rather than being a standalone certified document? - If so, should it not have more overt relevance within the oCEMP, oOEMP and the oDS, possibly through the addition of a standalone section which explains its purpose, contents and links with other management plans, instead of being embedded in Table 5 of the outline management plans? - If a separate WMP that covers the lifetime of the development is the best way forward, please give reasons why. Please also include information regarding the approval mechanism and consultees. - As water management will be key for other topics such as soil and ecology, should it also be referenced in the oSRMP, oEPMS and other outline management plans/strategies? If so, please set out which ones and the reasons why.
FHW2.9	The Applicant	Solar PV Panels - Environmental Management Plans The ExA notes the applicant's response to question FHW1.1 [REP3-128]. The LLFA [REP3-142] requested the applicant to provide a more explicit assessment of panel-induced runoff processes, including how different panel sizes and configurations could influence runoff rates, flow concentration, and soil interaction. The applicant's position [REP4-083] is that irrespective of the selected panel dimensions or tracking configuration, the drainage impacts of the panels will be adequately addressed through the relevant outline management plans (oCEMP, oSRMP, oLEMP and oOEMP). The LLFA [REP4-091] also requested a clearer explanation of the relationship between these documents and how they collectively address runoff management, soil structure protection, compaction control, vegetation establishment, erosion prevention, watercourse buffers, temporary drainage, operational monitoring, remediation and corrective action. The applicant is asked to respond to both requests in detail and to also review the mitigation route map requested through ExQ1-GCT1.6 to reflect its response.
FHW2.10	The Lead Local Flood Authority	LLFA Residual Themes The LLFA in [REP4-091] identifies six unresolved residual themes but it considers them as capable of resolution through further discussion and refinement. These issues relate to: - the integration of hydrology-related controls across documents - vegetation monitoring as a runoff and erosion control measure - recognition of the hydrological function of vegetation and soils - soil compaction monitoring and remediation - construction-phase drainage and water management - long-term monitoring, governance and performance triggers. - Considering the information submitted by the applicant at deadline 4, can you please provide an update on the residual themes at deadline 5? - If any further wording is needed in the environmental management plans to resolve these issues, can you please include it in your response, including the document and the wording required?
FHW2.11	The Applicant	Flood Risk to Farleaze Farm The grounds of Farleaze Farm were visited on the ExA's accompanied site inspection (ASI) on the 11 June 2026. From there the ExA was able to appreciate that flood risk to the property may be exacerbated by surface water flowing into the railway drains that are not able to cope with existing surface water flows and so backs up into the grounds of the property during storms. The landowner of Farleaze Farm made representations at CAH1 on 30 June 2026 about flood risk and drainage issues as a Category 3 party. The ExA understood from the applicant that it had not had any direct engagement with the landowner, but he raised concerns that the applicant's assessment of the route around Pig Lane fails to account for the local topography, drainage network and existing trees, and that the convergence of the railway drainage system and Pig Lane at the lowest point will constrain the route and require a wider construction area than currently shown.

ExQ2	Question to:	Question:
		The ExA notes the applicant's post hearing submission [REP4-084] which states that it is in discussions with Network Rail regarding protective provisions and a Framework Agreement; however, this does not address the concerns for Farleaze Farm. The applicant is asked to prepare an analysis to show how the infrastructure located around Farleaze Farm (specifically but not limited to the cable route works) in Lime Down C and west of Lime Down D will impact on the drainage of the area with a specific focus on the flows into the railway tracks and drains to ensure that the development will not increase flood risk to Farleaze Farm. The ExA expects more than a signposting to documents already in the Examination Library and requires a specific assessment of the implications for Farleaze Farm. The applicant should also identify and secure opportunities to reduce the causes and impacts of flooding at this property.
FHW2.12	The Applicant	Thermal Implications of Cables on Groundwater The EA asks in [REP4-097] (issue EA-030) for clarification about how micro-routing will ensure that no cables are within Source Protection Zone 1 and springs. They required the applicant to adhere to the advice note that they sent in February 2026 and provide more detail to demonstrate that the cables will not interact with these sensitive receptors. This should include depth to groundwater and anticipated ground conditions in sensitive groundwater areas. The applicant is to provide a response to this and include any changes needed to the environmental management plans or ES documents.
FHW2.13	The Applicant The Lead Local Flood Authority	Ordinary Watercourse Consent and Environmental Permitting The ExA in EXQ1 FHW1.19 requested the views of the LLFA regarding Articles 6 and 17 and Schedule 15, Part 9 provisions of the dDCO in relation to ordinary watercourse consent and environmental permitting. The LLFA provided a response [REP3-142] asking for amendments to Article 17 to make clear that, where the relevant watercourse, public sewer or drain falls within the drainage-authority regime, Part 9 governs the approval process instead of the generic Article 17(3) and (4) mechanism. That would avoid parallel approval regimes following DCOs already consented for other solar schemes. The applicant's response [REP4-081] was to reject the proposed changes to Part 9 provisions and accept the proposed changes to Article 17. The applicant added the LLFA proposed wording as 17(4) of the dDCO [REP4-004] to read: <i>Where the undertaker discharges water into, or makes any opening into, a watercourse, public sewer or drain belonging to or under the control of a drainage authority, the provisions of Part 9 of Schedule 15 (protective provisions) apply in substitution for the provisions of paragraphs (3) and (4).</i> The SoCG between the applicant and Wiltshire Council [REP4-061] does not include reference to these issues so both parties are requested to provide an update on this issue and consider if it should be included in the SoCG.
General and Cross-Topic Questions (GCT)		
GCT2.1	The Applicant	Construction Timescale The applicant detailed a 24-month timescale for the delivery of the project [APP-265]. Given the applicant's approach to ecology where it details making use of licensing/ permitting arrangements, the applicant is asked to confirm whether the time taken to acquire these licenses has been considered in the construction timetable. When answering this question, the applicant is asked to consider their answer to ExQ2 EB2.14 regarding seasonal workings. In considering the approach to ecology, if delays would be incurred due to the need to seek licenses and avoid species seasonal sensitivities, then the applicant is requested to provide an updated construction timetable along with commentary on whether a longer construction period has any ramifications for any other part of the environmental assessment or temporary possession of land.
GCT2.2	The Applicant	Community Orchard In the applicant's response to ExQ1 LSF1.18 [REP3-128] it was advised that discussions around the community orchard were ongoing. The applicant is requested to provide an update to these discussions and advise what will happen to the area marked for the community orchard should no agreement be reached during the examination. In considering your response to the above, please also provide justification for the inclusion of this land within the Order limits given the use appears to be speculative, particularly having regard to the compulsory acquisition guidance that the land to be acquired is no more than is reasonably required for the purposes of the development..
GCT2.3	The Applicant	Change Request In the applicant's change request covering letter, 'Change 3' is described as an <i>update to the Works Plans to allow more flexibility in the detailed design of the interconnecting cable alignment</i> [CR1-001]. It is understood that this additional flexibility to the site cabling across a wider area could have implications for public rights of way (PRoW), drainage, ecology, soil damage which have not been assessed. The applicant is requested to provide a summary of the implications of this change and how it has assessed the potential impacts resulting from 'Change 3'.

ExQ2	Question to:	Question:
GCT2.4	The Applicant	Re-powering Regarding the current policy direction of travel and the need for renewables going forward, on what basis should the ExA consider the proposed development to be 'temporary'? Whilst there is a decommissioning date (60 years) written into Requirement 20 of the dDCO, what is to stop the proposed development being re-powered? In such circumstances, would not the label of 'temporary' be misplaced in all ES assessments?
GCT2.5	The Applicant	Mitigation Route Map In response to ExQ1 GCT1.6 [REP3-128] the applicant stated that it would prepare a mitigation route map and submit this at a future deadline. The ExA requests that the first iteration of this document is submitted at deadline 5 and no later, so that there is reasonable opportunity for it to be reviewed, tweaked and updated as necessary at subsequent deadlines, and for the final version to be included as a certified document in the dDCO.
GCT2.6	The Applicant Wiltshire Council	Outline Operational Environmental Management Plan (oOEMP) At ISH4, around the discussion of the definition of 'maintain' in the dDCO, the applicant was asked about whether reporting mechanisms should be included within the oOEMP for when the anticipated wholesale replacement of the BESS units and solar PV panels take place; this is so that in 10 or so years' time when the BESS units are being replaced, or 30 to 40 years' time when the panels are being replaced, the local planning authority is notified. Taking this slightly further, the ExA considers that there may be some merit in a reporting mechanism for when 10% or more of those components are replaced at any one time (noting that malfunctioning or damage could occur well in advance of anticipated wholesale replacement timescales). The applicant at ISH4 stated that it would be open to adding something into the oOEMP regarding a reporting mechanism, but nothing was included in Revision 5 of the oOEMP [REP4-051] . The ExA considers that reporting mechanisms for replacement activities (excluding routine maintenance) can help local planning authorities to deal with queries from local communities when more than routine maintenance is occurring on the sites and communities are in the dark about what is taking place on the sites. The applicant and Wiltshire Council are therefore requested to consider what form of drafting could capture a reporting mechanism in the oOEMP for the wholesale replacement period of the BESS units and solar PV panels, and whether further reporting terms should be added for a much smaller replacement exercise (e.g. 10% of the components) but excluding routine maintenance.
Habitats Regulations Assessment (HRA)		
HRA2.1	Natural England	Bath and Bradford-on-Avon Bats Special Area of Conservation (SAC) Considering Wiltshire Council's ongoing concerns [REP4-061] that targeted bat activity surveys should have been undertaken within the CRC, can Natural England confirm: 1) That it is satisfied that the current survey information provides sufficient evidence to assess the effects of the CRC works on Annex II bat species associated with the Bath and Bradford-on-Avon Bats SAC? 2) Whether targeted bat activity surveys within the CRC would be likely to have materially influenced the conclusions of the HRA?
Health and Wellbeing (HW)		
HW2.1	The Applicant Wiltshire Council Stop Lime Down	Mental Wellbeing Stop Lime Down, in its comments on the applicant's responses to ExQ1 HW1.1 and HW1.3 [REP4-132] , expressed concern that the applicant had not adequately addressed the potential mental health impacts associated with the proposed development. It requested further information on a communications strategy demonstrating how the recommendations contained within Suffolk County Council's <i>Energy and Climate Adaptive Infrastructure Policy: Community Engagement and Wellbeing Supplementary Guidance Document</i> (SGD) have been considered and incorporated into the applicant's approach. The ExA acknowledges the sensitivity of this matter and recognises the efforts made by the applicant to engage with mental health providers within and around the Order limits to mitigate potential mental health impacts. Nevertheless, the ExA considers that the SGD contains guidance of relevance to the post-consent phase and that its recommendations could usefully inform the development of a clear and structured communications strategy. This may have implications for the applicant's response to ExQ SE2.9, particularly in relation to the proposed role and function of the Community Liaison Group (CLG). <u>Wiltshire Council and Stop Lime Down:</u> In its response to ExQ1 HW1.1, the applicant questioned the appropriateness of relying on the SGD on the basis that it is not specifically directed at the post-consent stage. The applicant requested that Wiltshire Council identify those elements of the SGD it considers most relevant to the development of a communications strategy.

ExQ2	Question to:	Question:
		1) Wiltshire Council and Stop Lime Down are therefore invited to identify the specific recommendations or principles within the SGD that they consider applicable to the post-consent phase and explain how these should be reflected within a communications strategy for Lime Down. Responses should also clarify their expectations regarding the purpose, scope and delivery of that strategy. <u>The Applicant, Wiltshire Council and Stop Lime Down:</u> Having regard to Stop Lime Down's deadline 4 submission [REP4-132], the ExA invites comments on how a communications strategy informed by the SGD could be secured, implemented and monitored. In particular: 2) Should responsibility for overseeing or supporting delivery of the communications strategy form part of the CLG's role? If so, how could this be achieved in practice? 3) How might such arrangements avoid placing additional burdens on volunteer representatives and Parish Councils? 4) What mechanisms, if any, would be appropriate to secure implementation and monitoring of the strategy throughout the post-consent phase? In responding, parties should also have regard to ExQ2 SE2.9. Wiltshire Council and Stop Lime Down are welcome to provide comments on that question where relevant.
Landscape and Visual (LV)		
Cotswolds National Landscape		
LV2.1	The Applicant Wiltshire Council Natural England Cotswolds National Landscape Board (CNLB)	Time Limited Enhancements The applicant's stated in its response to ExQ1 LSF1.1 [REP3-128] that there are no significant permanent effects on agricultural land, as all land will be returned to its original use and condition as far as practicable following decommissioning. The creation of wildflower meadows within fields A1, C1, C6, C8, C9 and B12 and the creation of wildflower meadow verges in A11, A12 and C10 are relied on by the applicant as beneficial effects to further the purposes of the Cotswolds National Landscape (CNL). The ExA understands that these enhancement measures are therefore time limited and removed at decommissioning. <u>The Applicant:</u> 1) The applicant is asked to confirm if the ExA's understanding is correct. <u>The Applicant, Wiltshire Council, Natural England and the CNLB:</u> 2) The parties are asked to comment on whether a time limited enhancement can be relied on to seek to further the purpose of conserving and enhancing the natural beauty of the national landscape under section (s) 85 of the Countryside and Rights of Way Act 2000 (as amended) (CRoW Act)? 3) If enhancements are removed at decommissioning, would that then be considered a harm to the purposes of the Cotswolds National Landscape at decommissioning?
LV2.2	Natural England	Furthering the Purposes of the Cotswolds National Landscape The ExA notes that the SoCG between the applicant and Natural England [REP4-063] states Natural England's position that the enhancement measures detailed in the applicant's Assessment of Effects on the CNL and its Special Qualities [APP-197] aid in demonstrating that the scheme will further the purposes of the National Landscape. Further to question LV2.1 above regarding the consideration of time limited enhancements, do Natural England consider that the proposed development demonstrates that enough has been done to fulfil the duty to seek to further the purpose of conserving and enhancing the natural beauty of the national landscape under s85 of the CRoW Act?
LV2.3	Wiltshire Council	Issue Specific Hearing 2, Action Point 13 The ExA notes that Wiltshire Council responded to Action Point 13 of ISH2 [REP4-093] to state that it considers that the CNLB to be the party which is best placed to provide details of cases which support its position on how the duty to further the purposes of the CNL under s85 of the CRoW Act should be applied. It is the ExA's understanding from ISH2, that Wiltshire Council's position was that the duty to seek to further the purposes of the CNL under s85 of the CRoW Act <u>would not</u> be fulfilled by the proposed development. On the Other hand, the CNLB state in its D3 submission [REP3-154] that it considers the applicant <u>has</u> sought to further the natural beauty of the CNL through the proposed enhancement measures located in its setting.

ExQ2	Question to:	Question:
		Wiltshire council is asked to confirm if it is now in agreement with the CNLB's position regarding the duty under s85 of the CRow Act? If not, it is asked to respond to action point 13 from ISH2.
LV2.4	Cotswolds National Landscape Board	Matters Raised at Issue Specific Hearing 2 The ExA understands that as a result of action point 8 from ISH2 [EV8-010] , a meeting was held between the applicant and CNLB on 13 July 2026. The CNLB are asked to confirm if there is agreement with the applicant in relation to: 1) The extent of the setting of the CNL as set out in the applicant's response to ExQ1 LV1.9 [REP3-128] (Annex E). 2) The proposed layout of panels in field A1 as shown in the Works Plans [REP3-004]. 3) Whether there is sufficient information in the control documents to mitigate impacts to the dark skies special quality of the CNL.
LV2.5	Natural England	Setting of the Cotswolds National Landscape Natural England is asked if it agrees with the applicant's response to ExQ1 LV1.9 [REP3-128] (Annex E) where it defined the setting of the Cotswolds National Landscape in spatial terms? If not, Natural England is asked to define in spatial terms the extent of the area outside of the boundary of the National Landscape that it considers forms its setting?
LV2.6	Natural England	Effects to the Cotswolds National Landscape and its Special Qualities The ExA notes that the SoCG between the applicant and Natural England [REP4-063] states Natural England's position that the proposed development is unlikely to result in significant adverse impacts to the CNL when considered alone. Natural England's attention is drawn to the submissions from the CNLB at D3 [REP3-153] and [REP3-154] in which the CNLB concludes that the proposed development would have a net adverse effect on the special qualities of the National Landscape. 1) Natural England is asked to comment on whether it agrees with the CNLB's position or the applicant's position on the special qualities of the CNL? 2) Natural England is also asked to confirm if it considers that the applicant has demonstrated that there would not be cumulative effects on the National Landscape that would increase effects identified when considering the project alone?
LV2.7	The Applicant	Linear Tree Planting in the Setting of the Cotswolds National Landscape The figures showing the enhancement within the setting of the CNL in Annex C of the applicant's response to ExQ1 LV1.1 [REP3-128] show proposed linear tree planting to the boundary of the CNL with fields C8, C6 and C1. Is this correct considering that hedgerows are proposed to be kept at existing heights in this location in order to preserve the character of the setting of the National Landscape?
Design and Parameters		
LV2.8	The Applicant	Battery Energy Storage System Parameters The Works Plans [REP3-004] appear to allow BESS development to extend close to the southern boundary of field D1 whereas the Landscape and Ecology Mitigation Plans [REP3-037] and the Landscape and Visual Impact Assessment Methodology [REP1A-006] (pdf page 64) do not show the BESS occupying the entirety of field D1 to allow for a proposed bund with scrub and tree planting and a proposed block of native woodland. 1) Do the Works Plans allow more flexibility in the size and location of the BESS than has been assessed for LVIA? 2) Should the Works Plans differentiate between the BESS itself and vegetation screening to reflect the model used in the photomontages?
LV2.9	The Applicant Wiltshire Council	Independent Design Review The applicant states in the Design Approach Document [APP-268] (Table A-1) that an independent design review is not necessary because the design team are very experienced. An experienced design team does not offer the same benefit to design development that an independent review can have. Given that there are a number of areas where flexibility is still required at this stage, should a design review post DCO consent and prior to the approval of detailed design be secured to include the following components of the proposed development? - The proposed solar photovoltaic technology (Work No. 1 (a)) - The layout of: - o the energy storage facility (Work No. 2) - o the onsite substations (Work No. 3) - o proposed temporary and permanent access points from the public highway (Work No. 8)

ExQ2	Question to:	Question:
Glint and Glare		
LV2.10	The Applicant	Aviation - Badminton Airfield The applicant predicts [APP-261] that solar reflections with ‘potential for temporary after-image’ (yellow glare) would occur towards receptors on the visual circuits at Badminton Airfield. However, the effects are considered by the applicant to be operationally accommodatable and therefore not significant. The conclusions of the Pager Power Glint and Glare Study recommend that consultation with Badminton Airfield is undertaken to understand their position. The applicant is asked to set out what consultation has taken place with Badminton Airfield and whether there is agreement that the effects would be operationally accommodatable?
LV2.11	The Applicant Stop Lime Down	Aviation - Cumulative Green Glare The Glint and Glare assessment submitted by Stop Lime Down [REP1-178] concludes that the RWY09 approach at Bowldown Farm and the RWY25 approach at Charlton Park each receive sustained cumulative green glare, in excess of 12,000 minutes from multiple contributing arrays. The applicant responded [REP2-039] that under the Sandia method and former Federal Aviation Administration guidance, there is no duration of green glare which is considered unacceptable from an aviation safety perspective, and the applicant therefore does not consider this to be a material cumulative effect. Furthermore, the applicant’s Glint and Glare Study [APP-261] states that where solar reflections are of an intensity of ‘low potential for temporary after-image’ (green glare), mitigation is not required. <u>The Applicant:</u> 1) The applicant is asked to identify and submit extracts of relevant guidance supporting its position on this matter. <u>Stop Lime Down:</u> Stop Lime Down is asked to respond to the applicant on this and explain the following: 2) What it considers is a correct assessment of the impact significance of the green glare on these approaches? Provide references to relevant guidance and submit this guidance into the examination. 3) Whether it considers that mitigation measures could reduce the impact to an operationally accommodatable level or if the impact is a result of the overall scale, spread and layout of the proposed development?
LV2.12	The Applicant Stop Lime Down	Road and Rail - Guidance In response to Stop Lime Down’s concerns [REP1-178] regarding the duration of yellow glare on road users and train drivers, the applicant [REP2-039] states that intensity of glare towards receptors is not a relevant consideration under Pager Power’s glint and glare guidance. Instead, reference is made to a driver’s primary field-of-view to determine whether a driver is likely to be looking in the direction of solar reflections. At deadline 4 Stop Lime Down [REP4-132] questioned the use of guidance produced by the authors of the applicant’s Glint and Glare Assessment [APP-261]. <u>The Applicant:</u> 1) The applicant is asked to provide justification of its use of Pager Power guidance and confirm if there is any other guidance available that supports its methodology regarding the assessment of the impact on road users and train drivers. 2) The applicant is asked to submit the Pager Power guidance and other relevant guidance supporting its position. <u>Stop Lime Down:</u> 3) Stop lime down are asked if there is guidance supporting the position that the duration and intensity of glare towards road users and train drivers should factor into the assessment of impact on these receptors rather than just the driver’s primary field of view? If so, submit the relevant guidance.
LV2.13	The Applicant	Software used for Assessment At deadline 4, Stop Lime Down [REP4-132] raised concerns regarding the independent validation of the software used for the glint and glare assessment. The applicant is asked to explain how the ExA can be satisfied that the results of its assessment can be relied upon to support its conclusions including whether the use of different software could potentially yield significantly different results.
LV2.14	The Applicant	Statement of Common Ground and Questions Raised by Stop Lime Down at Deadline 4 It is noted from the Statement of Commonality [REP4-059] that a draft SoCG between the applicant and Stop Lime Down is proposed to be submitted at deadline 5. In addition to the items requested by the ExA in ExQ1 LV1.28, the ExA request that written responses to the questions in paragraph 3.5.6 of Stop Lime Down’s deadline 4 submission [REP4-132] are included, either within the SoCG or as a separate document.

ExQ2	Question to:	Question:
Land Use, Soils and Food Security (LSF)		
LSF2.1	The Applicant	Cable Route Construction Method Statement In its deadline 4 submission [REP4-097], the EA, at reference EA-059, noted that the oCEMP [REP2-019] has been updated to include reference to the Discovery Strategy – as previously requested. In addition, Table 13 of the oCEMP has been revised in relation to the proposed ground investigation works. Given these updates, the applicant is requested to explain why Appendix 3-2: Cable Route Construction Method Statement [APP-183] has not been updated to reference the Discovery Strategy and, if appropriate, to provide an updated version of the document.
Noise and Vibration (NV)		
NV2.1	The Applicant	Road Resurfacing Paragraph 3.5.18 of ES Appendix 12-1 (Heritage Statement) [APP-219] states that groundborne vibration impacts associated with construction traffic have been scoped out on the basis that the resurfacing of the roadway as part of the scheme would result in a smoother running surface and would therefore reduce any existing vibration impact that may already exist. The ExA is unclear on which roadway(s) would be resurfaced as part of the scheme to justify scoping out vibration impacts from construction traffic and where/ how this resurfacing is secured. Please advise and direct the ExA to where this information is provided in the application documents. If this information is not contained in the application documents, the ExA requires the applicant to assess the potential impact of groundborne vibration impacts from construction vehicles on any of the sensitive receptors listed in Table 14-12 and Table 14-13 of ES Chapter 14 [REP1-021] (and any listed buildings which are not captured in those tables) which are on or in close proximity to (i.e. 25m) of the construction routes, or provide a detailed explanation as to why this is not considered to be necessary.
NV2.2	The Applicant	Noise Monitoring Location LT7 In response to ExQ1 NV1.4 [REP3-128] the applicant advised that the sound level meter at LT7 stopped monitoring after approximately 14 hours of a week-long survey, due to a technical issue with the meter, and that the limited data collected was inconsistent with typical expectations for a rural setting, as the background night-time sound levels were over 10 dB higher than those during the daytime. Explain why repeat noise surveys at LT7 have not been undertaken, given that data from LT7 would have been used to inform the baseline sound level at R24 (Lordswood Cottage) and R25 (Commonwood Farm)? If the applicant considers that noise surveys at another location were sufficient to inform the baseline level at R24 and R25 please explain this further, including the distances of the LT7 meter from those receptors and the distance(s) of any other meter(s) relied upon from R24 and R25.
NV2.3	Wiltshire Council	Background Noise Level Methodology In ExQ1 NV1.5 the ExA asked the Council to reconsider whether the applicant's use of fixed 30dB as a minimum background noise level at night continued to be appropriate. In its response [REP3-142], the Council presented the relevant British Standard and guidance and agreed that it was acceptable to replace background noise measurements with a fixed level as the applicant had done. The ExA appreciates the Council's explanation of the relevant British Standard and the associated guidance from the Association of Noise Consultants, which appears to allow for such an approach, but the ExA nonetheless still queries whether the effect of doing this firstly ignores the context of the receiving environment, and secondly artificially raises the baseline and therefore raises the LOAEL and SOAEL level (which is set against the baseline), which in turn informs the assessment of significance in EIA terms. The ExA would welcome a further response from the Council to these queries, particularly as the definition of 30dBL_{A90} as a 'very low' background level was removed from the British Standard and is not supported by the current version of BS4142:2014, and given the rural location where background levels at night were found for some residential receptors to be as low as 20dB and may therefore have given rise to a lower threshold for receptor sleep disturbance than the internal noise levels recommended in both BS 8233:2014 and the World Health Organisation (WHO) Guidelines, which were also cited by the Council.
NV2.4	The Applicant	Operational Noise Level Mitigation In response to ExQ1 NV1.8 [REP3-128], the applicant refers to the national policy for noise and vibration, in which significant effects are identified as those above the SOAEL. It added that, as moderate effects for the high sensitive receptors listed in Table 14-12 and Table 14-13 (of ES Chapter 14) correspond to levels above the LOAEL and below the SOAEL they are excluded from the classification of significance for noise and vibration as they are below the SOAEL.

ExQ2	Question to:	Question:
		On reviewing the Noise Policy Statement for England (NPSE), the ExA notes that it describes LOAEL as the level above which adverse effects on health and quality of life can be detected, whilst SOAEL is described as the level above which significant adverse effects on health and quality of life occur. This appears to confirm the applicant's position in its ExQ1 NV1.8 response around significant effects. Nonetheless, whilst the first aim of the NPSE is to avoid significant adverse impacts on health and quality of life from environmental, neighbour and neighbourhood noise, its second aim it to mitigate and minimise adverse impacts on health and quality of life from environmental, neighbour and neighbourhood noise. The NPSE clarifies that the second aim of the NPSE refers to the situation where the impact lies somewhere between LOAEL and SOAEL and it requires that all reasonable steps should be taken to mitigate and minimise adverse effects on health and quality of life while also taking into account the guiding principles of sustainable development. Paragraph 14.10.50 of ES Chapter 14 [REP1-021] states that 16 receptors are predicted to experience operational noise levels between the LOAEL and SOAEL: • North of Hullavington around Lime Down D (R10 – Bradfield Manor); • Norton between Lime Down B and D (R15 - Gorsey Leaze House, R16 – West Lodge, R41 – Honey Lane Cottage, R43 – Vine Tree Cottage, R44 – Orchard Cottage); • North of Grittleton around Lime Down C (R19 – Surrendell Farm); • Pig Lane between Lime Down C and D (R20 – Townleaze Farm, R21 – Farleaze South, R23 – Farleaze Cottages, R45 – Grain Store Barn); and • Ladyswood around Lime Down A and C (R28 – Lordswood Farm, R29 – Ladyswood Farm, R30 - Ladyswood Cottage, R35 – Fosse Farm, R36 – Lordswood Cottage) Paragraph 14.10.56 adds that the oOEMP commits to the resulting levels at properties to provide reassurance that the Scheme as built will not lead to significant effects from noise. The ExA is concerned that this does not demonstrate compliance with the NPSE and the requirement to mitigate and <u>minimise</u> adverse effects, rather merely commits to operational noise remaining between LOAEL and SOAEL, which for those 16 receptors would be worse than the present situation. The ExA therefore requests the applicant's clear position on whether it can commit to lower noise emissions and targets for those 16 high sensitivity receptors in the oOEMP, taking proper account of the very quiet rural nature of the area in which those properties are situated, and the NPSE aim of mitigating and minimising adverse noise impacts.
NV2.5	The Applicant	Noise Monitoring During Commissioning Phase To provide greater reassurance to residents that the applicant is committed to identifying and resolving noise impacts swiftly, would the applicant consider committing to undertaking noise monitoring during the immediate commissioning phase for each part? If not, why not? Should the applicant agree to noise monitoring during commissioning, confirm how long this would last and how this would be representative of the noise impacts on residents during the lifetime of the full operational phase. Also, how might this proposed noise monitoring be secured in the dDCO and what would happen if the noise levels during commissioning were found to be higher than the noise levels identified in the ES?
Resources and Waste Management (RWM)		
No further questions at this time.		
Socio-Economics (SE)		
SE2.1	Wiltshire Council	Economic Impacts Q1 The SoCG with Wiltshire Council [REP4-061], section 3.12.5, raises concerns over the local impact on the tourism industry with losses of approximately £1.76million. The applicant's response is that this figure represents less than 0.15% of the value of the combined tourism industry in Wiltshire. However, it is not the entirety of Wiltshire where these losses will be felt, but the local area around the proposed development, so this figure will have a more significant effect. This is discussed further in the applicant's response to deadline 3 submissions [REP4-082], section WC-035, where the applicant states that within a 5km area from the proposed development the losses would equate to 0.7%. The SoCG with Wiltshire Council section 3.12.11 suggests a compensation scheme for businesses to alleviate the negative effects on local businesses [REP4-061]. <u>The Applicant:</u>

ExQ2	Question to:	Question:
		1) Although losses might equate to less than 1% within a 5km area this could be quite significant to an individual business resulting in job losses and a loss of income below basic operating costs. The applicant is asked to detail its objection to the Council's suggestion of a compensation scheme to keep businesses operating during construction, maintenance and decommissioning given funding such a scheme should not be significant. <u>Wiltshire Council:</u> 2) You are asked to provide details of such a business compensation scheme, including further justification, how this would work, including the administration, eligibility and what measures would prevent businesses from taking advantage of it. You are also asked to detail how this would fit within the structure of the DCO or if it should be implemented via a s106 agreement.
SE2.2	The Applicant	Economic Impacts Q2 The applicant is asked to provide a technical note on the impact on non-equine local businesses within a 5km area of the proposed development. This should detail the nature of the affected business, their concerns, and what the applicant has done to address those concerns. Additionally, the ExA has the following specific queries: <u>Grittleton House</u> – In [REP4-082] (Refs. WC-105 and VJS-001), the applicant responds to concerns regarding impacts on Grittleton House. The applicant comments that it is open to discussions with the operators of the property whose business as an events venue could be adversely affected by the proposed development. Specific concerns relate to the location of a construction compound at Grittleton. The applicant is asked to provide an update to these discussions and what measures it has undertaken to reduce impacts on the business/ alleviate concerns or compensate for any loss in bookings/ income over the construction period. In addition, the applicant is requested to provide details of its site selection process for the construction compound and evidence for its location and how it considered the possible impacts on Grittleton House. Note that this should provide more detail than that provided in [REP4-082] (Ref. VJS-009). <u>Whatley Manor</u> – Submissions [REP4-103] and [REP4-134] both raise concerns of the proposed development on Whatley Manor and its operations. The applicant is requested to respond to these concerns and detail how they have been addressed. <u>Foxley Road Nurseries</u> – Post hearing submission [REP4-109] references that the business is 'extremely seasonal'. The applicant is requested to consider whether they can control the timing of works to avoid the peak seasonal operations of this business. <u>The Angel, Sherston</u> – Submission [REP4-113] raises concern of the loss of clientele resulting from landscape and visual impacts and ambience of the surrounding area and PRow network. The proposal will have some impact on footpaths with the potential displacement of users. The applicant is asked to consider how the proposal could adversely impact on this business and what measures may be undertaken to lessen the impact.
SE2.3	The Applicant Wiltshire Council Interested Parties whose community facility they consider will be adversely affected by the proposed development	Compensation for Community Facilities <u>All Parties:</u> The SoCG with Wiltshire Council, section 3.12.11, suggests a business compensation scheme [REP4-061]. Aside from the compensation to businesses there have been concerns raised by operators of community facilities that the proposal will result in their closure resulting from a lack of bookings during the construction, maintenance and decommissioning phases. Examples include [RR-2749], [RR-4315], [RR-4617]. All parties are asked to consider if they would be agreeable to a community facility compensation fund that would ensure they remain open and functional during the aforementioned phases and available for community use despite any negative effects of the proposed development. The applicant should note that simple reference to the Community Benefit Fund is not considered an appropriate response. <u>Wiltshire Council:</u> You are asked to provide details of such a community facilities compensation scheme, including further justification, how this would work, including the administration, eligibility and what measures would prevent businesses from taking advantage of it. You are also asked to detail how this would fit within the structure of the DCO or if it should be implemented via a s106 agreement.
SE2.4	The Applicant	Local Economic Benefits Wiltshire Council's deadline 4 submission [REP4-091] section SE1.3 questions the applicant's use of a generic 20km radius in assessing commuting distances and business impacts. Furthermore, it questions the economic benefits the proposal will deliver to the local area given the low unemployment rates in major population centres closest to the Order limits. The Council also queries if any mapping has been done to show potential supply chain businesses that might benefit from the proposed development. The applicant is asked to respond to these points as the ExA considers that it will provide a clearer picture of the likely local economic benefits that could be experienced by the local area, rather than on a regional or national basis.
SE2.5	The Applicant	Permissive Paths Q1

ExQ2	Question to:	Question:
		In response to ExQ1 SE1.1 [REP3-128] the applicant stated that it could not create onward highway connections for MALW50 and GSOM15 because this would require third party land outside the Order limits, would require new rights of way to be established that may prejudice the future use of the land within the Order limits, and would have environmental effects on hedgerows, trees and waterbodies (a stream and pond) that may substantially alter the applicant's approach to drainage and ecological mitigation. However, the applicant then goes on to say that it is still discussing if improvements to MALW50 and GSOM15 can be delivered through the allocated funding within the Community Benefit Fund, with the Council leading on establishing new rights of way with the engagement of the relevant landowners. The ExA is perplexed as to why the applicant considers the connections could still be created with funding allocated within the Community Benefit Fund if, as it suggests, the creation of new highway connections for these two footpaths may prejudice the future use of the land within the Order limits, and would have environmental effects on hedgerows, trees and waterbodies (a stream and pond) that may substantially alter the applicant's approach to drainage and ecological mitigation. The applicant is therefore asked to clarify whether its main issue against proactively facilitating the creation of onward connections for MALW50 and GSOM15 relates to land rights or the environmental implications, as the suggestion of creating the connections through Community Benefit Funds suggests the environmental implications cited are not constraints at all.
SE2.6	The Applicant Wiltshire Council Wiltshire Bridleways Association (WBA)	Permissive Paths Q2 A number of IPs [too many to list] have raised concerns about the impact on the enjoyment of footpaths in the Order limits. Concerns have also been raised that businesses will suffer as a result of a loss in recreational trade, for example [REP4-113]. The Council has suggested that an improvement fund should be provided by the applicant to cater for the displacement of users of the PRow network within the Order limits [REP4-061]. It is considered that the enjoyment of the existing PRow network within the Order limits will not be improved by the proposed development, regardless of additional connections and physical improvements. Therefore, the ExA considers that the Council's suggestion for a fund that seeks to improve the network outwith the Order limits to take account of displaced use, is not unreasonable. This would continue to encourage use of the wider PRow network regardless of the effect the proposed development. This approach will likely provide mitigation for businesses concerned by the loss of recreational trade and benefits to the mental health of those concerned by the loss of ambience on the network. <u>The Applicant:</u> 1) The applicant is requested to detail specifically their objections to the Council's suggestion of PRow improvement funds linked to the DCO via a suitable mechanism outwith the Community Benefit Fund, such as a s106 agreement, to improve paths outwith the Order limits to cater for increased footfall resulting from the adverse effect on paths within the Order limits. <u>Wiltshire Council:</u> 2) Please provide a suggested mechanism by which this should be agreed. If this is via a s106 agreement, then please provide draft wording, noting that a signed and executed s106 agreement would need to be submitted before the close of the examination for it to be considered by the SoS. 3) Additionally, the Council is asked to set out any role the WBA would be expected to have in contributing to the administration of this fund given its requests for improvements to the PRow network as detailed in its SoCG with the applicant [REP4-073]. <u>Wiltshire Bridleways Association:</u> Should the applicant provide a fund for the improvement of the PRow network as described and requested by Wiltshire Council, please set out what role you would expect to play in its administration, if any.
SE2.7	The Applicant	Permissive Paths Q3 In the SoCG with WBA section 3.1.10 [REP4-073] the applicant states <i>the Scheme would result in significantly changed runoff or inadequate drainage that could affect equestrian routes</i>. The applicant is asked whether they have missed out the word 'not', or to clarify this statement and provide further detail.
SE2.8	The Applicant	Equine Business Impact Report The applicant's response to ExQ1 SE1.9 [REP3-128] committed to submitting an assessment of the proposed development on equestrian businesses at deadline 4. This was not submitted as expected. The applicant is advised that this needs to be submitted at deadline 5 and no later, to allow interested parties fair opportunity to review and provide comment before the next set of hearings. The applicant should provide a detailed response to the concerns raised in [REP4-116], [REP4-117], [REP4-107], [REP4-108], [RR-0145], [RR-2102], [RR-0472], [RR-0098], [RR-3583] and the sensitivities of these businesses to the proposed development. Please note this should be submitted as a technical note, provide a more detailed and considered assessment than that provided in [PDA-009], [PDB-004], [REP1-117] and demonstrate an understanding of the effects of the proposed development on equestrian businesses.
SE2.9	The Applicant	Community Liaison Group

ExQ2	Question to:	Question:
		Requirement 4 of the dDCO sets out the terms of the CLG [REP4-004]. However, it makes no mention of its function, if any, during maintenance/ replacement activities or during decommissioning. The ExA considers the CLG should retain a function throughout the key phases of the life of the proposed development to include maintenance/ replacement activities and decommissioning, and requests that the applicant updates Requirement 4 accordingly. Furthermore, both Stop Lime Down [REP4-132] and Wiltshire Council [REP1-137] raise concerns over the function of the CLG and consider that it should operate in a collaborative manner with communities to allow them the chance to shape the final design of the project in a meaningful way. Stop Lime Down also comment on developing an effective communication strategy and the employment of a relationship manager. The applicant is asked to update the terms of the CLG to include reference of its function through the key phases of the proposed development during operation/maintenance and decommissioning as these periods are likely to raise similar community concerns as those during construction. The updated terms should also consider the comments from the Council and Stop Lime Down and explain the expected role of community groups, individuals and Parish Councils and the potential role of a relationship manager.
SE2.10	The Applicant Wiltshire Council	Innovation Forum Wiltshire Council set out in its response to ExQ1 SE1.10 [REP3-142], how an ‘Innovation Forum’ could operate and suggested that it could form part of the CLG. The applicant noted the benefits of an Innovation Forum in its deadline 4 response [REP4-081] but suggested that opportunities for an Innovation Forum could be considered through the same forums used for the Community Benefit Fund (CBF). The ExA is mindful that the purpose of the CLG is to provide information on the state of works during key phases of the proposed development and provide a forum for concerns/ complaints to be raised and addressed. It is not clear that an Innovation Forum would sit comfortably within this operation given the potential community burden this could place on volunteers. <u>Wiltshire Council:</u> 1) You are asked to consider how, in practical terms, an Innovation Forum would operate as part of the CLG without adding further burden on volunteers, including Parish Councils. <u>The Applicant:</u> 2) The Council has provided an example of how the Innovation Forum could operate and cited the Crossrail Elizabeth Line governance and innovation in their responses to ExQ1 [REP3-142]. You are asked to consider if such an approach would be suitable for the proposed development and how it could be secured by the dDCO. <u>Both Parties:</u> 3) You are requested to add this point to the SoCG with the aim of reaching a consensus on how the Innovation Forum should be delivered.
SE2.11	Foxley Road Nurseries	Seasonal Business Operations Your post hearing submission [REP4-109] references that the business is ‘extremely seasonal’. The ExA asks that you provide further details as to what is meant by this and if there are seasonal times when the avoidance of works affecting your business could be undertaken that would reduce the potential adverse effects arising from the proposed construction phase.
Transportation, Traffic and Highway Safety (TT)		
TT2.1	The Applicant	Construction Phase HGV Trip Generation The ExA notes that the Transport Assessment was updated at deadline 1 [REP1-057] and [REP1-059] to include new paragraphs 1.5.3 to 1.5.18 and Table 13-12 to provide further context and breakdown of HGV movement calculations for the construction phase. Specifically, paragraph 1.5.3 states: <i>To understand the number of HGV movements during the construction phase, trip generation has been calculated based on a first principles approach. This takes account of quantities of the following materials and activities required during the construction phase:</i> • Number of Solar PV modules; • Number of Solar PV module mounting structures; • Volumes of waste; • Number of Skids and power stations; • Cable lengths within the Solar PV Sites; and • General activities, including fencing, landscaping, compounds etc. A new Annex E was also provided to that document which provided a summary of the assumed components for construction of the solar PV sites. Part of that table is extracted and copied below:

ExQ2

Question to:

Question:

Components

	Solar PV Site						400kV Substation	BESS
	A	B	C	D (West)	D (East)	E	D (West)	D (West)
Modules (number)	58,750	54,764	165,820	155,869	36,562	117,223	-	-
Module Mounting Structures (weight in tonnes)	1,075	1,000	3,000	2,815	660	2,125	-	-

Vehicle Type and Capacity

	Vehicle Type	Assumed Capacity per Vehicle	unit
Modules	16.5m Articulated HGV (40ft standard container)	500	Number
Module Mounting Structures	16.5m Articulated HGV (40ft standard container)	21	Tonnes

Modules, Mounting Structures and Cables

Modules

	Land Parcel					Total
	A	B	C	D	E	
Modules	58,750	54,764	165,820	192,431	117,223	588,988
Modules per 40ft container (Regular Container)	500	500	500	500	500	-
HGVs	118	110	332	385	234	1,178

Module Mounting Structures

	A	B	C	D	E	Total
Mounting Structure Shipments (Tonnes)	1,075	1,000	3,000	3,475	2,125	10,675
Mounting Strutures Shipments (Tonnes per HGV Container)	21	21	21	21	21	-
HGVs	51	47	142	165	101	506

As can be seen from that table, the applicant assumed that a total of 588,988 solar PV panels would be installed on the sites and it is that number of panels which has informed the 1,200 HGV delivery figure. The ExA notes that this would roughly align with paragraph 7.10.11 of the Climate Change Chapter [APP-059], which stated that the total number of modules to be installed is expected to be 598,260.

However, at deadline 3, the applicant’s Climate Change Sensitivity Assessment Report [REP3-132], which in essence is a rebuttal to Wiltshire Council’s and Stop Lime Down’s written representations on climate change, stated that *a notional figure of approximately 842,000 panels has been assumed, which reflects an estimated maximum achievable installed capacity of the Scheme within the defined design parameters*. Further, in responding to Stop Lime Down’s Transport submission at deadline 3 [REP3-133], the applicant suggested that up to 864,000 panels would be delivered if using high-cube containers (instead of regular containers) without increasing the number of HGV deliveries stated in the Transport Assessment (1,200).

The ExA remains concerned that the applicant has underestimated the amount of solar PV panels required in its original assessments (and thus has not assessed the worst-case), and for transport issues specifically that it is either maintaining that the 1,200 deliveries associated with 588,988 modules would be no greater for 864,000 panels (and the associated increase in mounting structures), or alternatively relies upon the 50% buffer to account for under assessment.

This was discussed to some extent at ISH3 in light of Stop Lime Down’s notably divergent HGV trip forecasts, but the matter is far from resolved. The ExA notes that there has been some recalculation provided by Stop Lime Down at deadline 4 [REP4-132], but a similar re-appraisal has not been undertaken by the Applicant. In light of the applicant’s changing position on solar PV panel numbers during the examination, which is not reflected in its Transport Assessment, the ExA requires the applicant to:

1) Provide a comprehensive rebuttal to Stop Lime Down’s revised HGV Trip Generation Report included in Appendix A [REP4-132]; and

2) Provide its version of the numbers included in Stop Lime Down’s ‘Assessment of Construction Traffic Movements’ and ‘Flow Diagrams’ in pages 140 to 143 of [REP4-132], using the exact same format and presentation as Stop Lime Down in those pages so that direct comparison can be made.

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- 2) Provide its version of the numbers included in Stop Lime Down’s ‘Assessment of Construction Traffic Movements’ and ‘Flow Diagrams’ in pages 140 to 143 of [\[REP4-132\]](#), using the exact same format and presentation as Stop Lime Down in those pages so that direct comparison can be made.

ExQ2	Question to:	Question:
		This request is in addition to the outstanding ISH3 Action Point 12 submission, which required a full response to the points raised by Wiltshire Council and Stop Lime Down at ISH3 and Table 2 of [REP1-172] , which compares the ratios of HGV deliveries to the solar array areas for five other solar projects with the applicant's stated HGV delivery figures for solar panels and mounting structures for Lime Down.
TT2.2	The Applicant	Anticipated Replacement Deliveries Table 13-42 in ES Chapter 13 [REP4-014], which is the same as Table 13-15 in the Transport Assessment [REP4-037] shows the anticipated replacement HGV deliveries during the operational phase. For the activity line for substation units/ cabling, the applicant notes that there would be 20 x 16.5m articulated vehicle substation units/ cabling deliveries for Lime Down A, C and E, and 60 deliveries for the 400kv substation in Lime Down D West, yet during construction there are zero deliveries listed for substation units/ cabling in Table 13-20 of ES Chapter 13 or the equivalent Table 13-12 in the Transport Assessment. 1) The applicant is asked to explain why there would be replacement deliveries for these components but not construction deliveries for these components. 2) In addition, for the BESS in Lime Down D West, there are 450 replacement deliveries noted in Table 13-42 of ES Chapter 13 or the equivalent Table 13-15 in the Transport Assessment, but only 445 deliveries are noted during construction in Table 13-20 of ES Chapter 13 or the equivalent Table 13-12 in the Transport Assessment. Can the applicant explain why there would be more deliveries associated with substation units/ cabling for the BESS area during replacement?
TT2.3	The Applicant Wiltshire Council	Outline Construction Traffic Management Plan Q1 The ExA notes from the answer to first written question TT1.10 [REP3-128], that a traffic management and monitoring system will be considered, but then section 6.14.1 of the oCTMP [REP4-057] states that this system will be implemented. <u>The Applicant:</u> 1) Can the applicant confirm which position is correct? 2) The applicant is also asked to explain how the construction delivery booking system is intended to operate and how it can guarantee that the chosen delivery contractors will have the appropriate technology to allow real time tracking of construction delivery vehicles? 3) What input could the local highway authority have on the type of traffic management and monitoring system employed? 4) What enforcement mechanisms would be employed for contractor failures to adhere to the oCTMP? For example, the ExA considers that simple driver retraining for not following the dedicated routes seems like a light touch. 5) Paragraph 6.14.8 of the oCTMP states that the results of the delivery data monitoring will be reported by the applicant to the contractor to identify any issues which need to be resolved and any additional measures which should be implemented to prevent these from arising again. What reporting mechanism is there to the local highway authority, or is the applicant relying solely on the local highway authority to have to request a monitoring report? 6) The ExA is particularly interested in the applicant's approach towards adaptive management, for example should it become apparent that some of the construction routes turn out to be problematic/ or not suitable, or the HGV holding locations shown on Figure 4.3 (particularly the smaller ones on the B4044/ B4039 for example) are frequently unavailable. The ExA notes that the oCTMP does not include any measures for liaising with the local highway authority or the local communities should unforeseen issues arise. Explain why there are no adaptative management commitments included within the oCTMP? <u>Wiltshire Council:</u> 7) Can Wiltshire Council advise what its position is on the traffic management and monitoring process (including adaptive management commitments)?
TT2.4	The Applicant	Outline Construction Traffic Management Plan Q2 ExQ1 TT1.11 asked National Highways to clarify whether deliveries to the proposed development through junctions 17 and 18 should take place after 09:30 and before 16:30 on weekdays (or some other times)? In its response [REP3-151], National Highways stated that due to existing levels of congestion, it is expected that no construction traffic would pass through junctions 17 and 18 of the M4 during the weekday morning (08:00-09:00) and evening (17:00-18:00) peak hours, therefore vehicles should not pass through these junctions until after 09:30 and before 16:30 on weekdays. This would logically mean that vehicles would be arriving on site later than 09:30 depending on the travel time from the M4 to the various site access points. The applicant is requested to review its oCTMP, particularly paragraphs 3.2.6 and section 3.4 to explicitly include the National Highways' requirement in relation to HGVs, as well as advise on any implications this may have on the construction timetable and the construction traffic flows on the local construction route network if these strict times to avoid junctions 17 and 18 are imposed.

ExQ2	Question to:	Question:
TT2.5	The Applicant	Highway Improvement Works Q1 The ExA notes the inclusion of improved drawings within Appendix E of the oCTMP [REP4-057] and Annex I of the Transport Assessment [REP4-037] for highway improvement areas along Alderton Road and Fosse Way with annotations for the carriageway widths and areas of widening. However, details of the surface treatment for the widening areas is absent from the legend on the drawings and description of works in Table 7 of the oCTMP/ Table 13-20 of the Transport Assessment. Presumably if low lying grasses and edge of carriageway gravel are being removed to create passing bays, the widened area will need to be laid and finished with asphalt (or similar) to base course, binder course and surface course to match the adjoining highway. The applicant is asked to confirm and include the detail in Table 7 of the oCTMP/ Table 13-20 of the Transport Assessment and on the relevant drawings.
TT2.6	The Applicant	Highway Improvement Works Q2 Following ExA questions at ISH3, the ExA appreciates the applicant updating the oCTMP [REP4-057] to confirm the extent of works required at the B4039 at The Gibb on Drawing No. PL404 in Appendix E, which is also noted in Table 7 of the oCTMP as location B4039 at the Salutation Inn, Castle Coombe. The updates state that the works include removal of existing vegetation on the inside corner (in front of the property known as Firs Farm). While the applicant confirmed at ISH3 that the vegetation is within the public highway and not part of the Firs Farm property, it is nonetheless seemingly maintained by that property. The ExA has read the applicant's response to ISH3 Action Point 2 relating to dialogue with Firs Farm [REP4-086] but this response suggests that the correspondence issued to Firs Farm to date is generic consultation/ project update material, and not specifically about the impacts on this particular property and its curtilage. The ExA therefore seeks assurances that dialogue with the owners of that property has taken place on the matter of this vegetation removal to facilitate the highway improvement area (provide evidence of specific correspondence on this matter) and that the vegetation will either be reinstated, subject to the satisfaction of the owners of Firs Farm and highway authority approval, or the owner will be compensated.
TT2.7	The Applicant	Highway Improvement Works Q3 The ExA remains concerned about the lack of appraisal and commitment to possible highway improvement works on parts of the rural roads construction route network between the road east of Hullavington and Bradfield Cottages, particularly (but not limited to) the point where the road passes under the railway bridge in the direction of the Flying Monk Tap and Cafe. As observed by the ExA on its site inspections and as highlighted by Wiltshire Council at ISH3, this stretch of road currently offers no refuge, footway, or safe passing place for vulnerable road users, creating dangerous conditions even under current traffic volumes. The ExA is seeking specific commentary on what options the applicant has considered for this section of road, and what if any safety improvements can be made. In addition, what construction period control or monitoring commitments could be considered for this stretch of road to ensure that it is under continuous safety assessment during the construction (and replacement) period?
TT2.8	The Applicant	Grittleton Crossroads AIL Swept Path At ISH3 the ExA identified that there seemed to be no swept path drawing for AIL vehicles turning left at Grittleton Crossroads into Alderton Road, rather that the only drawing provided for this location showed a right hand turn at the crossroads towards Yatton Keynell or a left hand turn from Yatton Keynell onto the unnamed road back towards The Gibb. The applicant has subsequently stated in its post hearing note [REP4-086] that <i>the AIL swept path for Grittleton Crossroads is set out in Annex H of ES Volume 3, Appendix 13-1 Transport Assessment [REP3-065] (page 956)</i>. The plan referred to by the applicant is the same plan that the ExA was referring to at ISH3. It shows a 16 Axle Girder Frame Abnormal Load Carrier at Grittleton Crossroads but no swept path turning left into Alderton Road. The ExA can only assume that this AIL cannot take a left turn, so instead would have to turn right at the crossroads towards Yatton Keynell and unhitch the cab from the front-end and re-hitch at the back to enable the AIL vehicle to be able to proceed north along Alderton Road. If this is the case, the ExA would like this confirmed. Also, if this is the case, the ExA would like to understand where the cab would turn around to facilitate this procedure and whether there is sufficient width alongside the waiting carrier for the cab to pass alongside to enable re-hitching without any need for road widening in this location. Of course, if un-hitching and re-hitching is not intended, it remains that there is no swept path drawing for an AIL left turn at the Grittleton crossroads into Alderton Road, and one should be provided.
TT2.9	The Applicant Wiltshire Council Stop Lime Down	ISH3 Action Points 7 and 8 At ISH3, the ExA issued Action Point 7 to the applicant to provide a set of plans showing which parts of the construction route(s) would fail to meet the highway code requirements for passing non-motorised users (NMUs) with sufficient verge protection buffer, and/ or to provide a log of the locations and the length of those locations that would not provide sufficient passing space for each of the NMUs (with verge protection buffer) in line with the highway code. On page 19 of the applicant's written summary of oral submissions at ISH3 [REP4-086] the applicant records part of that discussion, noting that <i>the ExA directed the applicant for deadline 4 to identify areas where the road is not 5.5 metres wide on the plans, using a red box around those areas</i>. This is a

ExQ2	Question to:	Question:
		slightly different version of the discussion, but nonetheless, at the top of page 20 of its post hearing note, the applicant then states that it has <i>provided additional plans in Annex I of ES Volume 3 Appendix 13-1: Transport Assessment [EN010168/APP/6.3] (Revision 4) (Drawing PL109B) which shows the width of construction routes; and Appendix E in the Outline Construction Traffic Management Plan [EN010168/APP/7.22] (Revision 4) which includes proposed Highway Improvement Area Drawings for road widening and AIL movements.</i> The ExA notes that the citation to Drawing PL109B is incorrect as no such plan number is included in Annex I of the Transport Assessment [REP4-037], and similarly no such drawing number is provided in Appendix E of the oCTMP either [REP4-057]. Whilst the ExA notes that Drawing Nos. PL302, PL303, PL304, PL305, PL306 and PL309 included in Annex I of the Transport Assessment [REP4-037] appear to now show either passing bays and/ or dimensions of various parts of some of the construction routes, this is not strictly in accordance with ISH3 Action Point 7, although drawing numbers PL302, PL303 and PL304 appear to address ISH3 Action Point 8. <u>The Applicant:</u> 1) The applicant is requested to confirm whether another drawing specifically addressing Action Point 7, e.g. Drawing PL109B referred to in its ISH3 Note, should have been provided, or whether reference to that drawing is an error, with drawing numbers PL302, PL303, PL304, PL305, PL306 and PL309 instead intended to fulfil Action Point 7? 2) The applicant is also requested to advise whether the existing road widths shown on the latest drawings referred to above were actually measured on site? <u>Wiltshire Council and Stop Lime Down:</u> 3) Advise whether drawing nos. PL302, PL303 and PL304 now provide sufficient dimensions and details to the satisfaction of the parties to demonstrate sufficient passing space on Alderton Road and the Fosse Way, in accordance with ISH3 Action Point 8. Comments on drawing numbers PL305, PL306 and PL309 are also welcomed. The ExA is particularly interested to understand if additional drawings, dimensions or annotations are still required (and why) (including whether colour-shaded route sections, as per Wiltshire Council's suggestion at ISH3 and its post hearing submission [REP4-092] remain necessary).
TT2.10	The Applicant	Fowlswick Lane, Access 109 Can the applicant explain why, if the AIL construction access route to the Fowlswick Lane compound is intended to come off the B4039, it intends to take access into the site from the north-eastern end of that field and not the south-western end, closer to the junction with the B4039? The ExA appreciates that the intent may be to use an existing field access (in the location of proposed access 109), however, as highlighted by Chippenham Without Parish Council [REP4-094], the proposed opening in this location <i>would require considerable enlargement and metaling, as would the Fowlswick Lane itself, which would need to be widened down to the crossroads, and would require the removal of the mature hedgerow along the 200 metre length with verge, which could also have highway drainage implications.</i> In addition to the above question, and in light of the applicant's response to ISH3 Action Point 4 [REP4-086], which says that a <i>turning area for the whole AIL vehicle and trailer is not required as the AIL trailers are modular and on exit, the cab is unhitched from the front of the trailer and driven to the back of the trailer and hitched up, then drives off in forward gear</i>, the ExA seeks to understand a) why the HIA area wraps the north-eastern side of the compound and extends along Fowlswick Lane to Fowlswick Cottages (as shown on Figure 13-12-2 [APP-157]), and b) the full nature of the highway improvement works proposed in this location. The ExA expects substantially greater detail and explanation than that provided in Table 3 of the oCTMP and Table 13-11 of the Transport Assessment for access 109/ North of Fowlswick Lane.
TT2.11	The Applicant	Shuttle Bus Take-Up Q1 The ExA notes that within the construction worker travel plan, at Appendix C to the oCTMP [REP4-057], the applicant states that it is anticipated the majority of non-local construction workers will stay at local accommodation and be transported to Order limits by shuttle bus. At paragraph 3.2.10 of the oCTMP the applicant adds that for the purposes of the assessment, it has been assumed that 50% of workers will arrive by shuttle bus (or 622 workers, as detailed in Table 5 of the oCTMP). 1) Can the applicant explain what geographical area has been used to define local and non-local in this situation? 2) Can the applicant also confirm if the anticipated 50%/ 622 worker shuttle bus take-up is comprised of only non-local workers staying in local accommodation, or if those figures also include a proportion of local workers who may also wish to use the shuttle service? If the latter, please provide the proportional split between local and non-local workers anticipated in the 50%/ 622 worker take up figures. 3) Advise what assessments have been undertaken on the location and availability of local accommodation for non-local workers for the duration of the construction period and present this evidence.

ExQ2	Question to:	Question:
TT2.12	The Applicant	Shuttle Bus Take-Up Q2 In response to ExQ1 TT1.8, Wiltshire Council [REP3-142] noted that at the project’s scoping stage it advised the applicant that a 50% worker take-up rate for the shuttle bus was high and would prefer to see a lower shuttle bus assumed mode share of say 20%. The applicant ignored the Council’s scoping opinion on this matter and the ExA’s own request in ExQ1 TT1.8 to provide assurance that the figures underpinning the applicant’s Transport Assessment are realistic. However, as confirmed by the applicant’s transport expert at ISH3, actual traffic information (rather than modelled or assumed) from other similar solar schemes (such as Cleve Hill) is not publicly available, therefore assumptions have to be made. The ExA’s view, nonetheless, is that by assuming such a high shuttle bus take-up rate, the applicant may not have assessed a ‘worst case’ traffic loading on local roads. The applicant is requested to advise how the 50% take-up rate is the worst-case assessment, and as asked in ExQ1 TT1.8, the ExA wishes to understand how the applicant intends to deal with low shuttle bus uptake if it arises?
TT2.13	The Applicant	Construction Phasing Table 1 of the oCTMP [REP4-057] shows the construction of the 400kV substation being constructed in the first 6 months of the construction programme. The applicant noted in paragraph 2.1.30 of its deadline 3 response to Stop Lime Down [REP3-133] that whilst this is subject to change, this period was selected to represent the realistic worst case scenario for assessment as it provides a higher peak value than spreading trips across a two year period. Nonetheless, Stop Lime Down has noted in its deadline 4 submission [REP4-132] that at a meeting between the applicant and Stop Lime Down on 23 June 2026, the applicant’s transport expert conceded that the timescale for the 400kV substation construction would likely be similar to the BESS, around 2 years, which means that the 400kV substation would be constructed concurrently with Lime Down D and E and the BESS. As identified by the ExA in ExQ1 TT1.7 the ExA is already concerned about the applicant’s distribution of construction worker numbers proportionally across the solar PV sites in the transport assessment, for as has been identified by other IPs, the 400kV substation and the BESS, which are both in Lime Down D, are likely to attract well above the average number of workers for the solar sites. Therefore, the applicant is asked to explain the implications of an elongated substation construction period in terms of daily and peak flows of HGVs and light vehicle construction traffic from Dyson Roundabout to Bradfield Cottages, including the chances of HGVs meeting on that road.
TT2.14	The Applicant	ES Appendix 13-1 At ExQ1 the ExA highlighted an issue with the page numbering and lack of hyperlinks within the contents page of the document to the relevant Annexes, which is problematic in a 1000 page document. The document was updated at deadline 3 and the issues corrected. However, the subsequent update to the document at deadline 4 again lacks hyperlinking to the Annexes from the contents page, while the tracked version [REP4-038] lacks both hyperlinking and correct page numbers on the contents page. The applicant is required to ensure that any subsequent iterations of the document (clean and tracked) are correct and hyperlinks are inserted. This particular issue should be checked in all application documents (not just the transport assessment) submitted for deadline 5 and later deadlines
Other Environmental Matters (OEM)		
No further questions at this time.		