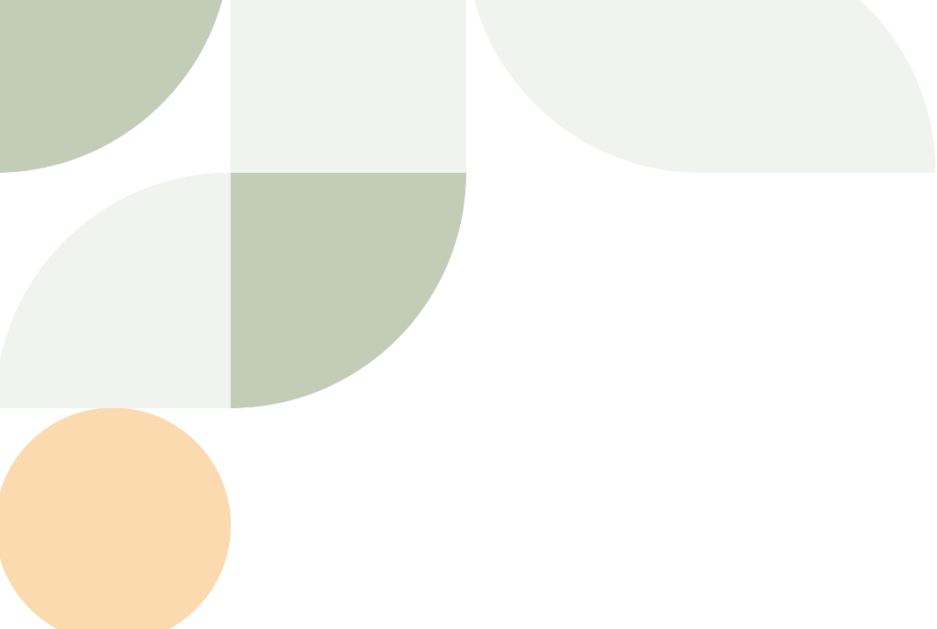




Lime Down

Solar Park

The Applicant's Response to Submissions Received at Deadline 4

August 2026

Revision 1

Planning Inspectorate Reference: EN010168

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The Infrastructure Planning (Examination Procedure) Rules 2010



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1 Introduction

1.1 Purpose of Document

- 1.1.1 This document provides Lime Down Solar Park Limited (the Applicant's) response to submissions made at Deadline 4 (10 July 2026) by Interested Parties.
- 1.1.2 A total of 44 documents were submitted by Interested Parties at Deadline 5 and published on the Planning Inspectorate (PINS) website on 14 July 2026. The Examining Authority (ExA) subsequently exercised its discretion to accept two further submissions, which were published on 20 July 2026 and 04 August 2026.
- 1.1.3 It is noted that Deadline 4 submissions primarily consist of written summaries of Interested Parties who spoke at the Compulsory Acquisition Hearing and Open Floor Hearing, held on 30 June and 1 July 2026.
- 1.1.4 Given the Applicant has provided detailed responses to those comments in the **Written Summary of the Applicants Oral Submissions and Responses at Compulsory Acquisition Hearing 1 and Responses to Action Points [REP4-084]** and the **Written Summary of the Applicants Oral Submissions and Responses at Issue Specific Hearing 4 and Responses to Action Points [REP4-087]** those responses are not repeated in this document.
- 1.1.5 Deadline 4 submissions also consist of any comments on submissions received at Deadline 3.

1.2 Structure of document

- 1.2.1 This document provides a response from the Applicant to the matters raised in the submissions and is structured as follows:
- Table 1-1 sets out the list of acronyms used for management documents that form part of the Applicant's submission and may have been referred to by the Applicant in responding.
 - Table 1-2 provides a summary of Deadline 4 submissions relating to written summaries of oral submissions and where a response has previously been given in the **Written Summary of the Applicants Oral Submissions and Responses at Compulsory Acquisition Hearing 1 and Responses to Action Points [REP4-084]** or the **Written Summary of the Applicants Oral Submissions and Responses at Issue Specific Hearing 4 and Responses to Action Points [REP4-087]**, a signpost to where this is set out is provided. If new information has been provided as part of the Deadline 4 submission, the Applicant has provided a response to it in this document. Table 1-2 also provides a signpost to where this information is set out in Section 2 of this document.

- Table 1-3 lists the local authorities that have submitted comments on submissions received at Deadline 3. These submissions are presented and responded to in full in Section 3 of this document.
- Table 1-4 lists the statutory consultees, undertakers and notable parties that have submitted comments on submissions received at Deadline 3 and with whom the Applicant is seeking to undertake a Statement of Common Ground. These submissions are presented and responded to in full in Section 4 of this document.
- Table 1-6 lists the host and neighbouring parish councils that have submitted comments on submissions received at Deadline 3. These submissions are presented and responded to in full in Section 5 of this document.
- Table 1-7 lists the parties that have submitted comments on submissions received at Deadline 3 and are also listed within the **Book of Reference [REP3-009]**. These submissions are presented and responded to in full in Section 6 of this document.
- Table 1-7 lists the submissions received from members of the public and all remaining organisations and businesses. These submissions are presented and responded to in Section 7 of this document.

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

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

Table 1-1 List of Acronyms

Acronym	Document
BESS	Battery Energy Storage System
BNG	Biodiversity Net Gain
BSMP	Battery Safety Management Plan
CEMP	Construction Environmental Management Plan
CNL	Cotswolds National Landscape
CR	Consultation Report
CTMP	Construction Traffic Management Plan
DCO	Development Consent Order

Acronym	Document
DS	Decommissioning Strategy
EIA	Environmental Impact Assessment
EPMP	Ecological Protection and Mitigation Plan
EPMS	Ecological Protection and Mitigation Strategy
EqIA	Equality Impact Assessment
ES	Environmental Statement
FRADS	Flood Risk Assessment and Drainage Strategy
FTE	Full Time Equivalent
GVA	Gross Value Added
LEMP	Landscape and Ecological Management Plan
OEMP	Operational Environmental Management Plan
PEIR	Preliminary Environmental Information Report
PROWPPMP	Public Rights of Way and Permissive Paths Management Plan
SRMP	Soil Resources Management Plan
SSCEP	Skills, Supply Chain and Employment Plan
SWMP	Site Waste Management Plan
WRS	Water Resources Strategy

1.3 Table of Parties Submitting Comments

Table 1-2 Summary of Submissions Made at Deadline 4 Relating to Written Summaries of Oral Submissions and Where New Information Is Responded to in Section 2

Doc Ref.	Name	Book of Reference Plot Number	Applicant's response
REP4-122	Mr Newman	08-005, 08-006, 09-006, 09-007, 09-008, 09-009	The Applicant's response is set out in Table 2-1.
REP4-110	GDPR -LDSF-025	N/A	The Applicant has addressed all the points raised in Section 2.21 of the Written Summary of the Oral Submissions at the Open Floor Hearing 2 and the Applicant's Responses [REP4-088] .
REP4-111	GDPR -LDSF-082	N/A	The Applicant's response is set out in Table 2-2.
REP4-130	Sarah Payne	08-002, 08-003	The Applicant has addressed all the points raised in Section 2.18 of the Written Summary of the Oral Submissions at the Open Floor Hearing 2 and the Applicant's Responses [REP4-088] .
REP4-109	Foxley Road Nurseries	N/A	The Applicant has addressed all the points raised in Section 2.13 of the Written Summary of the Oral Submissions at the Open Floor Hearing 2 and the Applicant's Responses [REP4-088] .
REP4-119	John Matthews	N/A	The Applicant has addressed all the points raised in Section 2.17 of the Written Summary of the Oral Submissions at the Open Floor Hearing 2 and the Applicant's Responses [REP4-088] .
REP4-103	Christian De Coulon	N/A	The Applicant has addressed all the points raised in Section 2.6 of the Written Summary of the Oral

Doc Ref.	Name	Book of Reference Plot Number	Applicant's response
			Submissions at the Open Floor Hearing 2 and the Applicant's Responses [REP4-088].
REP4-127	Rosalind Savage MP	N/A	The Applicant has addressed all the points raised in Section 2.1 of the Written Summary of the Oral Submissions at the Open Floor Hearing 2 and the Applicant's Responses [REP4-088].
REP4-100	Anna Layton	N/A	The Applicant has addressed all the points raised in Section 2.19 of the Written Summary of the Oral Submissions at the Open Floor Hearing 2 and the Applicant's Responses [REP4-088].
REP4-095 REP4-096	Hullavington Parish Council	N/A	The Applicant notes there are two submissions from Hullavington Parish Council. The Applicant has addressed all the points raised in REP4-096 in Section 2.4 of the Written Summary of the Oral Submissions at the Open Floor Hearing 2 and the Applicant's Responses [REP4-088]. The Applicant's response to REP4-095 is provided in Table 2-3.
REP4-097	Environment Agency	N/A	The Applicant's response is set out in Table 2-4.
REP4-099	Aileen Hood	N/A	The Applicant has addressed the points relating to use of agricultural land, food production, and the ability of the grid to cope with solar generation in Section 2.16 in Written Summary of the Oral Submissions at the Open Floor Hearing 2 and the Applicant's Responses [REP4-088].

Doc Ref.	Name	Book of Reference Plot Number	Applicant's response
			The Applicant's response to additional information provided in the Post Hearing Submission is provided in Table 2-5.
REP4-128	Roslyn Thomson	N/A	The Applicant's response to REP4-128 is provided in Table 2-6.
REP4-134	Whatley Manor	N/A	The Applicant has addressed all the points raised in REP4-134 in Section 2.5 of the Written Summary of the Oral Submissions at the Open Floor Hearing 2 and the Applicant's Responses [REP4-088]. The Applicant notes the additional provision of a document titled "Whatley Manor Ramble Routes". Our response to this is provided in Table 2-7 below.
REP4-131	Steve Harvey	N/A	The Applicant has addressed all the points raised in REP4-131 in Section 2.15 of the Written Summary of the Oral Submissions at the Open Floor Hearing 2 and the Applicant's Responses [REP4-088]. The Applicant notes the additional provision of a document titled "Strava Segments". Our response to this is provided in Table 2-8 below.
REP4-092	Wiltshire Council	01-003, 01-004, 01-005, 01-005, 01-006, 01-007, 01-008, 01-009, 01-010, 01-011, 01-012, 01-013, 01-014, 01-015, 01-016, 01-017, 01-018, 01-019, 01-020, 01-021, 01-022, 01-023,	The Applicant's response is set out in Table 2-9.

Doc Ref.	Name	Book of Reference Plot Number	Applicant's response
		01-024, 01-025, 01-026, 01-030, 01-031, 01-032, 01-033, 01-034, 01-035, 01-036, 01-037, 01-038, 01-039, 01-041, 01-042, 01-043, 01-044, 01-044, 01-045, 01-046, 01-047, 01-051, 01-051, 01-052, 01-053, 01-057, 02-001, 02-001, 02-002, 02-002, 02-003, 02-004, 02-004, 02-005, 02-006, 02-007, 02-007, 02-008, 02-008, 02-009, 02-009, 02-010, 02-010, 02-011, 02-011, 02-012, 02-012, 02-013, 02-013, 02-014, 02-014, 02-015, 02-016, 02-017, 02-018, 02-019, 02-020, 02-021, 02-022, 02-023, 03-001, 03-002, 03-003, 03-004, 03-005, 03-006, 03-007, 03-008, 03-009, 03-010, 03-011, 03-014, 03-015, 03-016, 03-017, 03-018, 03-019, 03-020, 03-021, 03-022, 03-023, 03-024,	

Doc Ref.	Name	Book of Reference Plot Number	Applicant's response
		03-025, 03-026, 03-027, 03-028, 03-029, 03-030, 03-031, 03-032, 03-033, 03-034, 03-035, 03-036, 03-037, 03-038, 03-039, 03-040, 03-041, 03-042, 03-043, 03-044, 03-048, 03-048, 03-049, 03-052, 03-052, 03-053, 03-053, 03-054, 03-054, 03-055, 03-055, 03-056, 03-057, 03-058, 03-059, 03-060, 03-061, 03-061, 03-062, 03-063, 03-064, 03-065, 03-078, 04-001, 04-001, 04-002, 04-003, 04-004, 04-004, 04-005, 04-005, 04-006, 04-006, 04-007, 04-007, 04-008, 04-008, 04-009, 04-009, 04-010, 04-011, 04-012, 04-013, 04-014, 04-015, 04-016, 04-020, 04-021, 04-022, 04-023, 04-024, 04-025, 04-027, 04-028, 04-029, 04-029, 04-030, 04-031, 04-031, 04-032, 04-036, 04-037,	

Doc Ref.	Name	Book of Reference Plot Number	Applicant's response
		04-047, 04-055, 04-056, 04-057, 04-058, 04-059, 04-060, 04-061, 04-065, 04-066, 05-001, 05-002, 05-003, 05-004, 05-005, 05-006, 05-006, 05-007, 05-007, 05-008, 05-008, 05-009, 05-010, 05-011, 05-012, 05-013, 05-014, 05-015, 05-016, 05-017, 05-018, 05-019, 05-020, 05-021, 05-021, 05-022, 05-022, 05-023, 05-024, 05-025, 05-026, 05-026, 05-027, 05-027, 05-028, 05-028, 05-029, 05-029, 05-030, 05-030, 05-031, 05-031, 05-032, 05-032, 05-033, 05-034, 05-034, 05-035, 05-035, 05-036, 05-036, 05-037, 05-038, 05-039, 05-040, 05-040, 05-041, 05-041, 05-043, 06-001, 06-002, 06-003, 06-003, 06-004, 06-004, 06-005, 06-005, 06-006, 06-007, 06-008, 06-010, 06-011,	

Doc Ref.	Name	Book of Reference Plot Number	Applicant's response
		06-012, 06-013, 06-014, 06-015, 06-016, 06-017, 06-018, 06-019, 06-021, 06-021, 06-024, 06-027, 06-030, 06-030, 06-032, 06-032, 06-035, 06-036, 06-037, 06-038, 06-039, 07-001, 07-002, 07-003, 07-004, 07-005, 07-006, 07-007, 07-008, 07-009, 07-010, 07-017, 07-018, 07-019, 07-020, 07-021, 07-022, 07-023, 07-024, 07-025, 07-026, 07-027, 07-028, 07-032, 07-033, 07-034, 07-035, 07-041, 07-041, 07-042, 07-042, 07-043, 07-043, 07-044, 07-044, 07-045, 07-045, 08-001, 08-002, 08-002, 08-003, 08-003, 08-004, 08-005, 09-001, 09-001, 09-002, 09-002, 09-004, 09-004, 09-005, 09-005, 09-006, 09-007, 09-008, 09-009, 09-010, 09-011, 09-012, 09-013, 09-014, 09-017,	

Doc Ref.	Name	Book of Reference Plot Number	Applicant's response
		09-022, 09-022, 10-001, 10-001, 10-002, 10-002, 10-003, 10-004, 10-005, 10-005, 10-006, 10-008, 10-009, 10-010, 10-011, 10-012, 10-013, 11-006, 11-007, 11-008, 11-010, 11-011, 11-011, 11-012, 11-013, 11-014, 11-014, 11-015, 11-015, 11-016, 11-016, 11-017, 11-017, 11-018, 11-018, 11-019, 11-019, 11-020, 11-020, 11-021, 12-001, 12-002, 12-003, 12-004, 12-005, 12-006, 12-007, 12-008, 12-008, 12-009, 12-009, 12-010, 12-010, 12-015, 12-015, 12-016, 12-016, 12-017, 12-017, 13-004, 13-005, 13-006, 13-007, 13-008, 13-009, 13-010, 13-011, 13-012, 13-012, 13-013, 13-014, 13-015, 13-016, 13-019, 13-019, 13-024, 13-024, 13-026, 13-027, 13-028, 13-028, 13-029,	

Doc Ref.	Name	Book of Reference Plot Number	Applicant's response
		13-030, 13-031, 13-032, 13-032, 13-033, 13-034, 13-034, 13-035, 13-036, 13-037, 14-001, 14-002, 14-003, 14-004, 14-004, 14-005, 14-005a, 14- 005a, 14-006, 14-006a, 14- 006a, 14-008, 14-009, 14-010, 14-011, 14-013, 14-016, 14-016, 14-017, 14-017, 14-019, 14-019, 14-020, 14-021, 14-021, 14-022, 14-023, 14-024, 14-024, 14-025, 14-026, 14-027, 14-027, 14-028, 14-028a, 14- 028a, 14-030, 14-031, 14-032, 14-033, 14-034, 14-037, 14-039, 14-041, 14-048, 14-049, 14-049, 14-049, 14-050, 15-001, 15-002, 15-003, 15-004, 15-005, 15-006, 15-007, 15-007, 15-008, 15-009, 15-009, 15-010, 15-011, 15-011, 15-012, 15-012, 15-012, 15-012, 15-012, 15-013,	

Doc Ref.	Name	Book of Reference Plot Number	Applicant's response
		15-013, 15-014, 15-015, 15-016, 15-016, 15-017, 15-018, 15-018, 15-018, 15-019, 15-020, 15-021, 16-001, 16-001, 16-002, 16-002, 16-002, 16- 002a, 16-002a, 16-002a, 16- 004, 16-004, 16- 004, 16-005, 16- 005, 16-007, 16- 008, 16-009, 16- 011, 16-012, 16- 014, 16-014, 16- 014, 16-014a, 16-014a, 16- 014a, 16-014b, 16-014b, 16- 014b, 16-014c, 16-014c, 16- 014c, 16-015, 16-016, 16-016, 16-016, 16-017, 16-017, 16-017, 16-018, 16-018, 16-018, 16-019, 16-019, 16-019, 16-020, 16-020, 16-020, 17-001, 17-002, 17-003, 17-004, 17-005, 18-001, 18-001, 19-001, 19-002, 22-001, 22-002, 23-001, 23-002, 23-003	

Doc Ref.	Name	Book of Reference Plot Number	Applicant's response
REP4-104	Christine Hamilton	04-037, 04-055, 04-056, 04-057, 04-058, 04-059, 04-060, 04-061, 05-001, 05-002, 05-003, 05-004, 05-005, 05-006, 05-007, 05-008, 05-009, 05-010, 05-011, 05-012, 05-013, 05-014, 05-015, 05-016, 05-017, 05-018, 05-019, 05-020, 05-023, 05-024, 05-025	The Applicant has addressed all the points raised in REP4-104 in Section 2.7 of the Written Summary of the Oral Submissions at the Open Floor Hearing 2 and the Applicant's Responses [REP4-088]. The Applicant notes the additional provision of a document outlining anecdotes from residents living near solar farms, however, has not provided a response to these given they relate to a different project, and not the Scheme.
REP4-105	Christopher Koscielny	N/A	The Applicant's response is set out in Table 2-10.
REP4-132	Stop Lime Down	N/A	The Applicant's response is set out in Table 2-11.
REP4-102	Caroline Moore	N/A	The Applicant has addressed all the points related to landscape, human health, need of the scheme, and impact on historical settings in REP4-102 in Section 2.11 of the Written Summary of the Oral Submissions at the Open Floor Hearing 2 and the Applicant's Responses [REP4-088]. The Applicant's response to additional information provided in the Post Hearing Submission is provided in Table 2-12.
REP4-112	Geoffrey Philipps	N/A	The Applicant has addressed all the points raised in REP4-112 in Section 2.14 of the Written Summary of the Oral Submissions at the Open Floor

Doc Ref.	Name	Book of Reference Plot Number	Applicant's response
			Hearing 2 and the Applicant's Responses [REP4-088]. The Applicant notes the additional provision of a document titled "Recommendations for Fallow, Roe and Muntjac Deer Fencing: New Proposals for Temporary and Reusable Fencing" by the Forestry Commission. Our response to this is provided in Table 2-13 below.
REP4-113	Gerard Joynton	N/A	The Applicant has addressed all the points raised in Section 2.22 of the Written Summary of the Oral Submissions at the Open Floor Hearing 2 and the Applicant's Responses [REP4-088].
REP4-120	KMT Farming and Consultancy on behalf of Mr and Mrs Eavis	05-043, 06-001, 06-002, 06-003, 06-004, 06-005, 06-006	The Applicant's response is set out in Table 2-14.
REP4-094	Chippenham Without Parish Council	N/A	The Applicant's response is set out in Table 2-15.
REP4-114 AS-021	Helen Worthey	N/A	The Applicant has addressed all the points raised in REP4-114 in Section 2.22 of the Written Summary of the Oral Submissions at the Open Floor Hearing 2 and the Applicant's Responses [REP4-088]. The Applicant notes the submission of a selection of research papers as requested by the Planning Inspectorate. The Applicant's response is set out in Table 2-16.
REP4-133	Vivienne Jane Clarke	N/A	The Applicant's response is set out in Table 2-17.

Doc Ref.	Name	Book of Reference Plot Number	Applicant's response
REP4-121	Mary Cundick	04-036	The Applicant's response is set out in Table 2-19.
REP4-108	Dermot Farrington	N/A	The Applicant has addressed all the points raised in Section 2.22 of the Written Summary of the Oral Submissions at the Open Floor Hearing 2 and the Applicant's Responses [REP4-088] .
REP4-123 REP4-124 REP4-125	Richard Tanner and Isabel Ross	10-004, 10-005, 10-006	The Applicant notes there are three submissions from Richard Tanner and one from Isabel Ross on behalf of Richard Tanner. The Applicant's response is set out in Table 2-20.
REP4-106	Craig Lance Newton Fuller	01-044, 01-048, 01-049, 01-050, 01-051, 01-052, 01-057, 04-001	The Applicant has addressed all the points raised in Section 2.22 of the Written Summary of the Oral Submissions at the Open Floor Hearing 2 and the Applicant's Responses [REP4-088] .
REP4-126	Roberts Berry Farm	N/A	The Applicant's response is set out in Table 2-20.

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

Examination Library Reference	Acronym	Book of Reference Plot Number	Relevant Representations Received From
REP4-090 and REP4-091	WC	Party not referenced in the Land and Rights Negotiations Tracker.	Wiltshire Council

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

Examination Library Reference	Acronym	Book of Reference Plot Number	Relevant Representations Received From
REP4-097	EA	N/A	Environment Agency
REP4-098	NH	09-018, 09-019, 09-020, 09-021, 13-003, 13-005, 13-006, 13-008, 13-009, 13-012, 13-013, 13-014, 13-016, 20-001, 20-002, 20-003, 21-001, 21-002, 21-003, 21-004, 21-005, 21-006, 21-007	National Highways
REP4-132	SLD	N/A	Stop Lime Down

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

Examination Library Reference	Acronym	Book of Reference Plot Number	Relevant Representations Received From
AS-022	HPC	N/A	Hullavington Parish Council

Table 1-6 List of Parties Whose Submissions Are Responded to in Section 6

Examination Library Reference	Acronym	Book of Reference Plot Number	Relevant Representations Received From
REP4-118	JB	05-033, 05-039, 05-042	John Baillie

Table 1-7 List of Parties Whose Submissions Are Responded to in Section 7

Examination Library Reference	Acronym	Relevant Representations Received From
REP4-116 and REP4-117	JF	January Farrington
REP4-107 and REP4-108	DF	Dermot Farrington
REP4-129	SA	Sam Allen
REP4-101	CH	Calvin Healy

2 Summary of Additional Matters Raised in Post Hearing Summaries and the Applicant's Responses

2.1 Mr Newman

Table 2-1

Reference	Theme	Issue	Comments	Applicant's Response
NM-001	Compulsory Acquisition	Non-compliance with MHCLG Guidance on the Compulsory Purchase Process	Following the Compulsory Acquisition hearings, I am aware that [REDACTED] raised his professional fees, and there were comments suggesting that concessions had been made by the Applicant in this regard. I wish to clarify the current position and to correct this characterisation. Current Position It is our view that the Applicant is not complying with MHCLG Guidance on the Compulsory Purchase Process regarding the payment of landowners' reasonable professional fees incurred in Heads of Terms negotiations. The Guidance sets out a non-exhaustive list of actions acquiring authorities should take before proceeding to compulsory	The Applicant acknowledges the respondent's concerns relating to the compliance with relevant best practice guidance and the Applicant would like to provide assurances that they are compliant with all relevant legislation and relevant best practice guidance documents. The Applicant has previously responded directly to the respondent's agent on this point on the 12 June 2026, as outlined in the Land and Rights Communication Log [REP4-076] on the points raised. The Applicant's response confirmed and outlined their compliance with the relevant

Reference	Theme	Issue	Comments	Applicant's Response
			purchase, including giving consideration to funding owners' and occupiers' reasonable costs of negotiation — expressly including professional fees — incurred in advance of the acquisition process. The Guidance further requires that the Applicant's statement of reasons explain how, and to what extent, this has been done, and where it has not, why not. At present, the Applicant only meets landowners' negotiation fees where: 1. the landowner signs HoTs for an option agreement with the Applicant; or 2. where no option agreement is concluded, the landowner's fees may only be reimbursed in the event that the DCO is made and the landowner becomes a claimant. This approach requires landowners to engage in Heads of Terms negotiations without any assurance that their professional costs will be met, effectively	legislative and best practice documents and standards to the respondent's agent. The Applicant has since held an in-person meeting with the respondent and their agent on 15 July 2026 as captured in both the Land and Rights Communication Log [REP4-076] and Land and Rights Negotiation Tracker [REP4-009] to resolve the concern raised in the representation.

Reference	Theme	Issue	Comments	Applicant's Response
			placing them at risk throughout the process — a position which does not reflect the approach envisaged at paragraph 19 of the Guidance, and I invite the Applicant to explain its position. Clarification on Concessions For the avoidance of doubt, I am not aware of any concession having been made by the Applicant in respect of landowners not being required to negotiate at risk. To the extent that comments made at the hearings suggested otherwise. The terms on which the Applicant is negotiating with other affected landowners is not my concern. However, there is concern that other landowners may, similarly, be negotiating at risk without necessarily being aware that this is the case.	

2.2 GDPR-LDSF-082

Table 2-2

Reference	Theme	Issue	Comments	Applicant's Response
GDPR82 - 001	Description and DCO Process	Development is unnecessary	Hello, my name is [REDACTED] who will be severely affected if Lime Down goes ahead. I have lived in the area all my life and have a passion for all elements of the countryside. The beautiful area I live in is really precious to me and so many others for so many reasons and I don't want to see this ruined by unnecessary development.	The Applicant notes the individuals lived experience of growing up in the local area. Detailed responses to specific points are provided in GDPR82 – 002-007 below.
GDPR82 - 002	Landscape and Visual	Equine Concerns	I frequently ride my horse on my own and with friends along many of the sites where the proposed solar project will go. If it goes ahead, I may no longer be able to exercise my horse with friends. Even if I will still be able to take my horse out along these bridleways, the scale of the development will permanently damage the looks of the rural landscape making it an unpleasant place to take my horse.	The Applicant refers to the Equine Business Report [EN010168/EXAM/9.62] submitted within Deadline 5. Re-routing or temporary closure of bridleways and byways may be advisable during peak construction times to minimise risk of impacts to equestrian users.

Reference	Theme	Issue	Comments	Applicant's Response
				These public rights of way are likely to be in transient use and therefore this reduces the extent to which this risk to equines in the area can be applied. The Applicant has provided mitigation measures to public rights of way users including, but not limited to, warning signage, provision of banksmen at locations HGVs may need to cross or use sections of PRowWs, and closing or diverting PRowWs where construction activities would directly interact with PRowW use. As recommended, the Applicant is also able to provide signage for alternative routes for equestrian users of bridleways and byways, so that risks to equines and their riders and handlers can be minimised without also stopping pedestrians and cyclists from using these routes.

Reference	Theme	Issue	Comments	Applicant's Response
				The LVIA [REP3-025] recognises the change to the visual amenity and associated adverse effects to users of those PRow that are located within the array itself or directly adjacent. The design of the Scheme has embedded buffers into the proposed layout, specifically a 15m offset to any proposed infrastructure on either side of any PRow. Where PRow directly cross the array, this creates a corridor with a minimum width of 30m wide between proposed fencelines through the array. There would then be a gap of 4m between the fence line and the proposed panels resulting in a minimum total width of 38m between the panels where PRow cross the arrays. The Applicant acknowledges that for PRow located within the array itself or directly adjacent effects, users would experience adverse effects as a consequence of the Scheme as a consequence of the change from

Reference	Theme	Issue	Comments	Applicant's Response
				agricultural farmland to a solar development for the lifetime of the Development.
GDPR82 - 003	Transport and Access	Equine Concerns	Added to that it won't be as safe to ride in these areas during the build process. The roads around here are already under pressure, in many places it is tight to pass with two small vehicles or a for a vehicle to pass a horse. The huge number of extra vehicles and large vehicles will place a huge extra pressure on our roads and no doubt the verges will be driven on more as impatient drivers try to make their deliveries on time. This does not make for a safe place for horses being ridden. While my horse is really well behaved, it would only take one impatient driver to change things.	The Applicant refers to the Equine Business Report [EN010168/EXAM/9.62] where HGV-Equine interactions have been assessed and mitigation in place to minimise threats to horses as a result of interactions with HGVs on construction routes.
GDPR82 - 004	Ecology and Biodiversity	Wildlife	When I am riding alone, I enjoy the sounds of nature. Recently, I was really excited to hear a cuckoo. I think I inherited my strong interest in nature from my grandfather who had often said to me that he hadn't heard a cuckoo for years so	Potential impacts on ecology and biodiversity, including potential impacts on breeding bird species such as cuckoos, are fully assessed in ES Volume 1, Chapter 9: Ecology and Biodiversity [REP4-010] .

Reference	Theme	Issue	Comments	Applicant's Response
			when I heard the cuckoo, I recorded the sound on my phone and sent the recording to him- by the way, he was thrilled. This project will disturb the precious eco systems of both our migratory visitors and the native wildlife that lives here all the time.	The assessment identifies avoidance, mitigation and enhancement measures to address potential impacts on habitats and protected and notable species. It also identifies opportunities for ecological enhancement, including the creation and long-term management of habitats and the delivery of biodiversity net gain. The assessment identifies embedded and additional mitigation measures and concludes that, with these measures in place, no significant adverse effects are anticipated for protected and notable species, with the exception of ground-nesting birds of open habitats and hedgerows. Residual significant adverse effects remain at a local level of geographical importance for skylark and hedgerows, and at the site level for other ground-nesting bird species.

Reference	Theme	Issue	Comments	Applicant's Response
				In relation to cuckoo, this species has been recorded at the Solar PV Sites during breeding bird surveys, as reported in ES Volume 3, Appendix 9-4 Breeding Bird Survey Report [APP-201]. Habitats likely to be of greatest importance within the Order Limits include the network of woodlands, scrub and mature hedgerows. These habitats will be predominantly retained as part of the Scheme, with substantial additional habitat creation and enhancement also proposed through the Scheme design. Measures to minimise potential impacts on habitats and protected and notable species, and to secure ecological enhancements, will be secured through Development Consent Order (DCO) Requirements, including the Outline Landscape and Ecological Management Plan [REP3-100] and the Outline Ecological Protection and Mitigation Strategy [REP4-055].

Reference	Theme	Issue	Comments	Applicant's Response
GDPR82 - 005	Landscape and Visual	Height of panels	Another aspect of being out in the open that I enjoy is exactly that- being out in the open. Being surrounded by 4.5m tall solar panels will prevent me from being in the open as they will tower over me and make me feel like I am in a street of glass, a narrow corridor with a monotonous view to the front and barriers to my sides.	The design of the Scheme has embedded buffers into the proposed layout, specifically a 15m offset to any proposed infrastructure on either side of any PRow. Where PRow directly cross the array, this creates a corridor with a minimum width of 30m wide between proposed fencelines through the array. There would then be a gap of 4m between the fence line and the proposed panels resulting in a minimum total width of 38m between the panels where PRow cross the arrays. The proposed buffers will ensure that a sense of openness is retained.
GDPR82 - 006	Transport and Access	Traffic impacts	To get to most days, I would be affected by the disruption caused by the HGVs as the roads aren't designed to cope with the sheer volume of traffic required to build the project. This could have an effect on my education as I could be late to	As set out in the Outline CTMP [REP4-057] Construction vehicles will avoid travel during the network peak hours where possible. Therefore, deliveries will be scheduled for between 09:30 and 16:30 on weekdays and between 09:30

Reference	Theme	Issue	Comments	Applicant's Response
			school frequently. The total environmental cost of all this driving will be huge. Added to that there will be significant machinery movements after the building has been completed.	and 12:30 on Saturdays. This will minimise any impacts on school journeys. As set out in ES Volume 3, Appendix 13-1: Transport Assessment [REP4-037], during the operation and maintenance phase, there are anticipated to be around five visits to each Solar PV Site per month for maintenance purposes. These would typically be made by light van or 4 x 4 type vehicles. During the operation and maintenance phase, there will be an ongoing replacement of defective panels and breakages etc. This is expected to be on an ad-hoc basis and will result in a non-material level of HGV trips on a day-to-day basis. ES Volume 3, Chapter 7: Climate Change [EN010168/APP/6.1] (Revision 2) sets out the benefits of the Scheme on Climate Change – the operation of the Scheme will contribute towards the UK's statutory commitment to achieve net zero

Reference	Theme	Issue	Comments	Applicant's Response
				greenhouse gas emissions by 2050. The role of the Scheme extends beyond decarbonising the electricity sector; a secure and abundant supply of low carbon electricity is essential to enable wider transition away from fossil fuels across the economy, supporting emissions reductions in sectors that cannot be decarbonised through changes to electricity generation alone.
GDPR82 - 007	Site Selection and Alternatives	Alternatives	I believe that there's other locations which would be more suited to having solar panels, such as on houses and industrial estates rather than on greenfield sites in an area of natural beauty and also in some areas such as round the fosse, areas of historical importance.	With regard to brownfield land, rooftops and lower quality sites, the Applicant has considered brownfield land and rooftops as set out in its Site Selection Assessment Report [APP-185] . The assessment of previously developed/brownfield land identified no land of an adequate area to facilitate a large-scale solar project either individually or in combination with other sites (see table 2-2 of the site selection assessment report).

Reference	Theme	Issue	Comments	Applicant's Response
				Commercial rooftops were also considered, but initial considerations showed that it was unlikely that there would be rooftops or combined premises of an adequate area to facilitate a large scale solar project or provide a viable network of sites in close proximity that would be large enough to accommodate a project equivalent to the Scheme. As set out in the Statement of Need [REP1-085], the Applicant is supportive of rooftop solar but this is not seen as an alternative to the Scheme and should be deployed in addition to large scale solar farms, rather than instead of them.

2.3 Hullavington Parish Council

Table 2-3

Reference	Theme	Issue	Comments	Applicant's Response
HPC-001	Transport and Access	Traffic Impacts	Hullavington Parish Council wishes to draw the Examining Authority's attention to a specific and serious road safety concern that we feel has not been adequately articulated in our previous representations. The junction of The Street, Hullavington, with Norton Road presents a significant and existing hazard for active travellers — pedestrians, cyclists, and horse riders — particularly at the point where the road passes under the railway bridge in the direction of the Tap café – the Flying Monk. 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 road is derestricted, we have a primary school on that end of the street and we now have	The Applicant acknowledges that Hullavington Village Community Group's Walk 8 is routed along the road between Hullavington village and Bradfield Cottages, with this same link providing the most direct access for villagers to access the Flying Monk Café and Taproom. The Applicant acknowledges that this stretch of road has no footway and in locations such as under the railway bridge, limited verge width. As such, it is understood that at present pedestrian users already (where able) use the verge to step off the road for large vehicles passing. Cyclists also already have to share this route with some large vehicles, such as agricultural tractors and trailers, and any HGVs, light goods vehicles, and recovery vehicles accessing the commercial units to the north of the railway at the Old

Reference	Theme	Issue	Comments	Applicant's Response
			an additional estate under construction at that junction with 71 new properties. The Parish Council is deeply concerned that construction traffic associated with the Lime Down Solar Park development will materially worsen these conditions. Any increase in HGV and construction vehicle movements along this route will significantly heighten the risk to pedestrians, cyclists, and horse riders using what is an established active travel corridor for our community. Indeed for cyclists commuting to Malmesbury, this is the only practical route avoiding the A249. We note that this concern was also raised by the Wiltshire Council Transport representative at the Issue Specific Hearing held on 2nd July 2026, and we respectfully request that the Examining Authority give it appropriate weight in its assessment of the traffic and transport impacts of this development.	Railway Yard, Hullavington. Whilst this route has not been specifically assessed, ES Volume 1: Chapter 16: Socio-Economics, Tourism and Recreation [APP-068] finds the effect on the local highway network for recreational users is medium-term temporary minor adverse effect and therefore not significant. Connecting PROWs (HULL2, HULL4, and HULL5) have been found to have up to a temporary moderate-minor adverse effect during construction, which is also not a significant effect. This may serve as a more accurate proxy for this specific route due to the specific constraints to nonmotorised users in this location. The Applicant's analysis results in a peak of 56 HGV movements over a day on this route resulting in 8 movements an hour (1 every 7.5 minutes).

Reference	Theme	Issue	Comments	Applicant's Response
			We urge that any consent granted include robust and enforceable conditions or obligations requiring the applicant to assess, mitigate, and monitor the impact of construction traffic on active travellers at this specific location, including consideration of a Construction Traffic Management Plan that explicitly addresses the safety of vulnerable road users on Norton Road and the approach under the railway bridge.	The Applicant is in dialogue with WC and SLD consultants to try to agree a position and way forward in relation to construction trip numbers and therefore impact. In relation to this, further information on trip generation will be submitted within ES Volume 3, Appendix 13-1: Transport Assessment [EN010168/APP/6.3] to be submitted at Deadline 5. The construction routes have been selected to avoid routing through Hullavington centre. The delivery drivers will follow the logistics app rather than a standard satnav so will stick to the proposed routes and not travel through Hullavington centre.

2.4 Environment Agency

Table 2-4

Reference	Theme	Issue	Comments	Applicant's Response
EA1-001	Ecology and Biodiversity	Watercourse Buffers	<i>Action 24 please provide further detail and justification why a 10 m watercourse buffer is necessary from an ecological perspective.</i> We recommend that all applicants provide a minimum 10m watercourse buffer from the bank-top for all watercourses (ordinary watercourses and main watercourses). This is a standard baseline we request for all schemes, based on professional opinion. The purpose is to provide a wide margin to maintain connectivity and a continuous pathway for wildlife (especially to allow otters to commute in high flow), allow habitat creation across the landscape in the form of tussocky grass, scrub and scattered trees to provide shelter for riparian mammals and a general biodiversity value; and finally to provide a buffer that maintains bank	The Applicant notes the Environment Agency's clarification that a 10 m buffer to ordinary watercourses is advisory and that the Environment Agency defers to the LLFA on those watercourses. The Scheme adopts an ecology-led and receptor-specific approach rather than a uniform 10 m buffer to every watercourse. The committed minimum buffer to any ditch or watercourse is 8 m. This is increased where ecological sensitivity requires it, including: • 10 m where there are signs of otter or abundant evidence of water vole; • 10 m to major watercourses; and • 15 m to certain minor watercourses where identified through the ecological assessment and design process.

Reference	Theme	Issue	Comments	Applicant's Response
			stability and to capture runoff to improve water quality. However, we stress that the recommendation to provide a 10m buffer around ordinary watercourses is an advisory comment from the Environment Agency, and we defer to the Lead Local Flood Authority for comments on ordinary watercourses.	The 8 m minimum also reflects the established regulatory and operational corridor commonly applied alongside Main Rivers, including for flood risk activity permitting and access for inspection and maintenance. Although those permitting controls do not apply universally to ordinary watercourses, the same distance provides a consistent minimum baseline across the Scheme. These buffers are measured from the bank top and provide continuous undeveloped corridors alongside watercourses. They allow riparian habitat to be retained and enhanced, maintain ecological connectivity and provide space for vegetation capable of intercepting sediment and diffuse runoff. Watercourse bank stability and water quality are also protected through the pollution prevention, runoff management and soil management measures secured through

Reference	Theme	Issue	Comments	Applicant's Response
				the Outline CEMP [REP4-049], Outline SRMP [REP4-053] and detailed design. The Applicant therefore does not consider that a blanket 10 m buffer to every ordinary watercourse is necessary or proportionate. The proposed buffer framework responds to the ecological function and sensitivity of each watercourse and already provides larger buffers where required. The 8 m minimum buffer to ordinary watercourses has also been discussed with the LLFA, which has not requested that it be increased to 10 m. The Applicant considers that the Scheme's existing watercourse buffer commitments adequately address the ecological functions identified by the Environment Agency and no amendment is proposed.
EA1-002	Ecology and Biodiversity	Riparian Mammal Surveys	<i>Action 25: Water vole surveys Applicant to liaise with the Environment Agency on</i>	The Applicant notes this comment from the Environment Agency.

Reference	Theme	Issue	Comments	Applicant's Response
			<i>survey discrepancy and provide an update.</i> It is our position that the design, construction, mitigation and compensation measures of all planning proposals should be based on ecological surveys and assessments, carried out at an appropriate time of year by a suitably experienced surveyor, using recognised survey methodology. This applies to legally protected species, principally those associated with the water environment, and priority species for which the Environment Agency are the lead partner for conservation. This position also corresponds to British Standards 42020:2013 and CIEEM Ecological Impact Assessment Guidelines (EIAG). Following our response to the Examining Authority's First Written Question EB1.2, during Lime Down Examination ISH3, the applicant confirmed that the spot checks conducted within the Cable Route	A response was provided on this matter in the Written Summary of the Applicant's Oral Submissions and Responses at Issue Specific Hearing 3 and Responses to Action Points [REP4-086], in the response to Action Point No. 25, in which the Applicant's approach to species-specific survey within the Cable Route Corridor and precautionary approach to the assumption of protected species presence in suitable habitat was set out. The response also refers to previous consultation with the Environment Agency on this matter, during which the proposed approach was discussed and no further concerns raised by the Environment Agency prior to Issue Specific Hearing 3. Surveys for riparian species within the Cable Route Corridor, comprising habitat suitability assessments and spot checks for field signs, have been undertaken with the primary intention of identifying suitable

Reference	Theme	Issue	Comments	Applicant's Response
			Corridor to search for evidence of riparian species at watercourses (as mentioned in ES Chapter 9, REP1-015) did not follow standard survey protocol, as signs were recorded ad-hoc during habitat surveys. We are of the opinion that the survey data is not robust enough to confirm species presence/absence, which is essential to inform mitigation and compensation measures. We are particularly concerned that protected species, such as otter, may have places of rest near the crossing locations that the applicant may have missed due to the low survey effort. Therefore, there is the potential to disturb otters or water voles during construction, should a shelter (holts, couches and burrows) be present, which is an offence under the Wildlife and Countryside Act (1981) and Conservation of Habitats and Species Regulations (2017). We are happy to discuss this with the applicant to understand why they have taken this approach so we can consider it further.	habitat for species such as otter and water vole. The results of these surveys have not been used to confirm species absence, instead, the presence of riparian mammals has been assumed in all areas of suitable habitat identified during the surveys. With regards to otter in particular, the approach taken to assume the presence of the species in suitable habitat within the Order Limits is in line with The Otter Field Survey and Monitoring Handbook: A practical guide to field and camera-trap surveys (2026) M.A.Findlay & P.J.C. White, which states the following: 'Confirming the presence of otter on site is rarely needed; presence should be assumed across most of the UK where there is suitable habitat. This approach obviates the potential for false negatives'. As stated within the Outline Ecological Protection and Mitigation Strategy [REP4-055], further surveys for riparian

Reference	Theme	Issue	Comments	Applicant's Response
				mammals will be completed post-consent, should consent be granted for the Scheme, to provide further detail and inform the potential need for protected species licences and ensure contravention of wildlife legislation does not occur during construction and operation. Further consultation between the Environment Agency and the Applicant is on-going with respect to this matter.
EA1-003	Ecology and Biodiversity	Fisheries	<i>Fisheries</i> We request that the applicant adds an additional commitment into their Outline Construction Environmental Management Plan that any fish rescue using equipment other than rod and line must have written permission from the Environment Agency under S27(a) of the Salmon and Freshwater Fisheries Act 1975. A full method statement should be submitted when applying for permission detailing on locations, timings, equipment being used, fish welfare	The Applicant notes this comment and has provided an updated version of the Outline Construction Environmental Management Plan [REP4-049] (Revision 6) at Procedural Deadline 5 to specify the requirement for obtaining permissions from the Environment Agency when undertaking relevant fish rescue activities.

Reference	Theme	Issue	Comments	Applicant's Response
			measures and reason for rescue. Further information can be found here: <u>Apply to use fishing instruments other than rod and line in England - GOV.UK</u>	

2.5 Aileen Hood

Table 2-5

Reference	Theme	Issue	Comments	Applicant's Response
AH-001	Description and DCO Process	Impact on Villages	I have many, many other objections that couldn't be fitted into 3 minutes. They include: this would make local villages extremely unpleasant to live in	The Applicant has sought to robustly and comprehensively assess the potential impacts of the Scheme in the ES [APP-052 to APP-265], as updated throughout Examination], and mitigate them as required through the management plans secured through the Requirements in Schedule 2 of the Draft DCO [REP4-004]. This has been done to fully demonstrate the potential impacts of the Scheme against its benefits (including but not limited to energy production, economic, employment and skills, local ecology and biodiversity benefits) so that these matters can be considered in the planning balance when the DCO is determined.
AH-002	Climate Change and Energy Need	Solar Inefficient in Winter	solar does not work efficiently (if at all) in winter in the UK	Paragraph 3.3.20 of NPS EN-1 explains that it is the Government's view that a low-cost, net zero consistent system is likely

Reference	Theme	Issue	Comments	Applicant's Response
				to be composed predominantly of wind and solar. Section 8.5 of The Statement of Need [REP1-085] sets out evidence on the system adequacy of solar generation, in particular how large capacities of renewable generation will, in combination, be capable of meeting GB's seasonal electricity demand. Figure 29 demonstrates that while solar generation is higher in summer (when wind is lower) than in winter, solar still plays a meaningful role in contributing to national supplies all year round.
AH-003	Climate Change and Energy Need	Distance from the Grid	It is too far from the grid to be efficient. There is no point in creating electricity far from the grid, only to lose a lot of it enroute to the grid.	Action Point 4 of The Applicant's Written Summary of the Applicant's Oral Submissions and Responses at Issue Specific Hearing 1 and Responses to Action Points [REP1A-012] explains that the transmission losses associated with the 400kV single circuit cable between the 400kV Substation and the Existing National Grid Melksham Substation would be circa 0.1% or lower.

Reference	Theme	Issue	Comments	Applicant's Response
				The use of 400 kV cables enables electricity to be transmitted with minimal losses over the length of the cable route and supports the overall viability of the Scheme.
AH-004	Climate Change and Energy Need	Use of Battery Storage	the plan for batteries is not to store over-production - it is to store electricity produced when it's cheap and sell it back to us at a profit when it's expensive. This should not be allowed!	Agenda Item 6.3 of The Applicant's Written Summary of the Applicant's Oral Submissions and Responses at Issue Specific Hearing 1 and Responses to Action Points [REP1A-012] explains the role of the batteries to support the operation of the solar panels. Further information is provided in Sections 5.11 and 6.9 of The Statement of Need [REP1-085]. In particular, it is clarified that: <i>"As we build an energy system reliant increasingly on variable renewables, improving the flexibility of the wider electricity system is key... A significant increase in short-duration flexibility of 29-35 GW across battery storage, consumer led flexibility and interconnection capacity from 2023 levels will reduce the amount of</i>

Reference	Theme	Issue	Comments	Applicant's Response
				<i>more costly generation and associated network infrastructure that needs to be built, whilst maintaining security of supply" [Clean Power 2030 Action Plan, p14].</i>
AH-005	Other Environmental Matters	Safety Concerns for Battery Storage	lithium batteries are extremely dangerous; the fire service cannot put them out if they catch fire.	This matter has previously been addressed in the Applicant's Response to Relevant Representations (Part 2) [REP1-117], reference O-03. That response addresses concerns regarding fire risk associated with lithium batteries, and cross-refers to the Applicant's Response to Relevant Representations (Part 1) [PDA-009], reference OF-006. Further information is provided in the Outline Battery Safety Management Plan (BSMP) [REP1-110], in particular at paragraphs 4.1.6–4.1.9, 4.1.31–4.1.33 and 5.1.3–5.1.6. As set out at paragraph 4.1.5, the BESS system design must be capable to control or fully suppress a fire, without the direct intervention of Dorset & Wiltshire Fire and Rescue Service

Reference	Theme	Issue	Comments	Applicant's Response
				(D&WFRS), the local fire and rescue service. The Outline BSMP [REP1-110] is secured through Requirement 6 of Schedule 2 to the Draft DCO [REP4-004].
AH-006	Transport and Access	Construction Traffic	the single-track roads will be incapable of carrying the heavy loads needed during construction I use the single-track roads when I drive my pre-war car - it's far safer and more enjoyable than doing 40-45mph on the A429/A350. This would not be the case if they were full of HGVs	All roads on routes to PV sites are two-way working and not single-track lanes. There are no HGV restrictions on any of the links proposed as construction routes. Swept-path drawings provided in Annex J of ES Volume 3, Appendix 13-1: Transport Assessment [REP4-037] demonstrates there are frequent opportunities for HGVs and car to pass along the proposed routes.
AH-007	Hydrology, Flood Risk and Drainage	Flood Risk	the generating station would almost certainly increase flooding, which is bad enough on local roads as it is. Malmesbury (where I live) is sometimes completely cut off.	The Applicant does not agree that the Scheme would increase flood risk in Malmesbury or on the surrounding road network. Flood risk has been assessed through ES Chapter 11: Hydrology, Flood Risk and

Reference	Theme	Issue	Comments	Applicant's Response
				Drainage [REP4-012] and the site-specific FRA and Drainage Strategies [REP4-023 to REP4-035]. The majority of the Scheme is located in Flood Zone 1, with infrastructure sequentially located away from areas at higher risk where practicable. Solar panels are elevated above ground and do not create a connected impermeable drainage catchment. Rainfall will continue to fall beneath and between the panel rows and infiltrate or drain across the fields. Formal impermeable infrastructure will be subject to controlled drainage, attenuation and discharge controls, while construction-related compaction and runoff risks will be managed through the Outline CEMP [REP4-049] and Outline SRMP [REP4-053]. The assessments do not identify any material increase in flood risk beyond the Scheme boundary, including at Malmesbury. Detailed drainage design

Reference	Theme	Issue	Comments	Applicant's Response
				will also be secured through Requirement 11 of the Draft DCO [REP4-004]. The Applicant therefore does not accept that the Scheme would worsen existing flooding or increase the likelihood of Malmesbury becoming inaccessible.
AH-008	Hydrology, Flood Risk and Drainage	Drinking Water	the piles would almost certainly reach our underground drinking water supply. Nobody fully understands how the underground water system works (I have this from an expert) so nobody is qualified to say this is safe to do.	The applicant has committed to undertaking ground investigation in order to inform a foundation works risk assessment on all piling activity, as secured via the Outline CEMP [REP4-049]. This commitment was made in the initial document submission (see Table 13 of APP-277). This will be done in line with the appropriate guidance on undertaking piling risk assessment, i.e. the CL:AIRE & Environment Agency guidance document <i>Piling and Penetrative Ground Improvement Methods on Land Affected by Contamination: Guidance on Pollution Prevention</i>, which will ensure that groundwater resources are adequately

Reference	Theme	Issue	Comments	Applicant's Response
				protected in the event of piled foundations being used.
AH-009	Site Selection and Alternatives	Use of Rooftops	we have acres of space on large rooftops that could hold solar panels, and these are in areas where electricity is used, so far more efficient	The Applicant has considered rooftops as set out in its Site Selection Assessment Report [APP-185]. However, initial considerations showed that it was unlikely that there would be rooftops or combined premises of an adequate area to facilitate a large scale solar project or provide a viable network of sites in close proximity that would be large enough to accommodate a project equivalent to the Scheme. As set out in the Statement of Need [REP1-085] the Applicant is supportive of rooftop solar but this is not seen as an alternative to the Scheme and should be deployed in addition to large scale solar farms, rather than instead of them.
AH-010	Description and DCO Process	Funding	this project would not be viable without government subsidies - it's just a way of putting my tax money into tax havens!	The Applicant confirms that it does not require any public money, subsidy or funding in the development of the Scheme.

Reference	Theme	Issue	Comments	Applicant's Response
				The Applicant and parent company's projects are designed and delivered by private investment, generating clean energy and wider economic and environmental benefits with no requirement to use public funds.
AH-011	Climate Change and Energy Need	Need for the Scheme	It's absolutely not being proposed from a desire to produce clean electricity, I strongly object to this.	The Applicant acknowledges the respondent's strong objection and wishes to clarify that the Scheme is a direct response to an urgent national need for low-carbon generation to meet legally binding net-zero targets.
AH-012	Soils and Agriculture Climate Change and Energy Need	Carbon Payback and Food Security	there is no proof this proposal would EVER produce enough electricity to make up for the carbon released during its construction, and the additional carbon released on an ongoing basis from the food that used to be (or could be) produced there being produce abroad.	Section 4 of the Farming and Food Security Technical Note [REP4-079] sets out the farming circumstances within the Solar PV Sites. Typically, more than one-third of the land within each of the holdings affected is currently within an environment scheme. As those agreements come to an end, coinciding with the presence of the Scheme, the land used for food

Reference	Theme	Issue	Comments	Applicant's Response
				production will be rotated to other parts of the holdings. There is not anticipated to be a reduction in food output from the presence of the Scheme. ES Volume 3, Chapter 7: Climate Change [REP1-182] assesses the carbon emissions associated with the construction, operation and decommissioning of the Scheme over its lifetime. The chapter demonstrates that the Scheme will generate more than enough energy to offset emissions associated with its construction. Moreover, the chapter demonstrates that more carbon would be emitted over the lifetime of the Scheme without such developments contributing towards the UK's statutory commitment to achieve net zero greenhouse gas emissions by 2050.

2.6 Roslyn Thomson

Table 2-6

Reference	Theme	Issue	Comments	Applicant's Response
RT-001	Transport and Access	Construction Routes	Whilst attending the Lime Down hearing on July 2nd I noticed the applicant did not explain the route to Lime Down E for both shuttle traffic and that for abnormal loads	Shuttle buses and AIL traffic will access Lime Down E via Access 18 shown in ES Volume 2, Figure 13-11 Construction Access Locations: Solar PV Sites [APP-156]. The construction route for general construction activities is shown in Figure 4.1 in the Outline CTMP [REP4-057], while the AIL routes for the deliveries of transformers to the proposed substation are shown in Figure 5.1 in the Outline CTMP [REP4-057].
RT-002	Site Selection and Alternatives Ecology and Biodiversity	Hedgerows	Earlier in the hearing the applicant sounded very doubtful of the cable route as lots of landowners that spoke were very against it crossing their land yet during the afternoon session of July 2nd the applicant spoke at great lengths as to cutting through hedgerows knowing where	Individual hedgerows, including those within the Cable Route Corridor (CRC), have been identified where hedgerow removal will be required and are listed within Schedule 12 of the Draft DCO [REP4-004] , however detailed locations for proposed crossings within each listed hedgerow are not known at this stage and

Reference	Theme	Issue	Comments	Applicant's Response
			the cable route was going to be placed which I felt most disturbing.	will be determined at the detailed design stage. However, maximum widths of hedgerow removal at each location will be in line with Micro-siting of the cable will be informed by pre-construction surveys, as set out within the Outline Ecological Protection and Mitigation Strategy [REP4-055], and designed to minimise potential adverse impacts on sensitive receptors, including ecological features such as protected and notable species. From an engineering perspective, the installation of the underground cable route has been designed to minimise physical disruption to the landscape. While the CRC has a typical width of 50m, the actual construction working width is restricted to a maximum of 25m. Where the route must pass through field boundaries, the engineering footprint is narrowed further to a maximum gap of 12m in the hedgerow.

Reference	Theme	Issue	Comments	Applicant's Response
				This breach is a functional requirement to accommodate both the 1.7m wide cable trench and the temporary haul road necessary for moving plant and cable drum. The precise locations and final widths (up to the maximum) of these breaches would be defined following the detailed design phase.
RT-003	Ecology and Biodiversity	Wildlife Habitats	Also when the session was brought to a close no one had mentioned that 2200 acres will be enclosed with security fencing and would be taking away the natural environment and habitat for hundreds of wildlife of many species including different species of Deer, Monk Jack, Badgers, Foxes, Hare, Rabbits, we also have Mink and Otter in the area plus Voles and Great Crested Newts in the many ponds. The above have survived in this area for ever how will this continue has the applicant considered this.	The Applicant notes this comment raising concerns relating to the installation of security fencing at the Solar PV Sites and potential impacts on species such as deer, badger, brown hare, otter and great crested newts. The Applicant has addressed this matter in detail in the Applicant's Response to the Examining Authority's First Written Questions [REP3-128], responding to questions EB1.12 and EB1.13. In summary, perimeter security fencing would comprise wire mesh and wooden post fencing as shown in Paragraph 3.3.75 and Plate 3-14 of ES Volume 1, Chapter 3 The Scheme [APP-055]. This

Reference	Theme	Issue	Comments	Applicant's Response
				fencing would be permeable to badger, foxes, hare, rabbits, mink, otter, voles and great crested newts. It is noted however that the BESS compounds and substations will be secured by palisade fencing, which is expected to exclude most mammal species. Deer are expected to be displaced from the interior of Solar PV Sites due to the presence of perimeter security fencing. However, the Scheme design has embedded unfenced buffers (minimum of 15 m) from all hedgerows and woodlands around the peripheries of the Solar PV Sites, which will allow wildlife, including deer, to move between favoured habitats. Potential impacts on ecology and biodiversity, including potential impacts on the aforementioned species, are fully assessed in ES Volume 1, Chapter 9: Ecology and Biodiversity [REP4-010]. The assessment identifies avoidance, mitigation and enhancement

Reference	Theme	Issue	Comments	Applicant's Response
				measures to address potential impacts on habitats and protected and notable species. It also identifies opportunities for ecological enhancement, including the creation and long-term management of habitats and the delivery of biodiversity net gain. The assessment identifies embedded and additional mitigation measures and concludes that, with these measures in place, no significant adverse effects are anticipated for protected and notable species, with the exception of ground-nesting birds of open habitats and hedgerows. Residual significant adverse effects remain at a local level of geographical importance for skylark and hedgerows, and at the site level for other ground-nesting bird species. It is noted by the Applicant that American Mink are a non-native mammal species listed under Schedule 9 of the Wildlife and Countryside Act 1981 (as amended), and it is considered that Scheme design

Reference	Theme	Issue	Comments	Applicant's Response
				and impacts arising from construction and operation are not anticipated to result in the spread of this species beyond current extents. Under Requirement 10 (Fencing and other means of enclosure) of the Draft DCO [REP4-004], details of fencing will need to be submitted to and approved by Wiltshire Council.

2.7 Whatley Manor

Table 2-7

Reference	Theme	Issue	Comments	Applicant's Response
WM-001	Socio-Economics, Tourism and Recreation	Impact on Business	Let me be clear at the outset: we are not opposed to renewable energy. We have recently achieved Earth Check Gold certification—one of the highest global standards in sustainable tourism—and we are among a very small number of hotels in the UK to do so. This represents years of work and significant investment to operate responsibly and sustainably. I say that so you understand the weight of what follows. This proposal would directly and materially harm the very things we have worked so hard to protect. Our guests come to Whatley Manor to escape. They seek peace, quiet, and the beauty of the Countryside—and many return, with over a third of our business being repeat guests. This development would impact their entire experience: the	The Applicant refers to the response provided to 'ME-002' in the Written Summary of the Oral Submissions at the Open Floor Hearing 2 and the Applicants Responses [REP4-088].

Reference	Theme	Issue	Comments	Applicant's Response
			approach from the motorway, the walks and cycle rides, and the tranquillity that defines their stay. We see this as a direct threat to the enjoyment of our facilities and to the integrity of what we offer.	
WM-002	Air Quality Construction and Decommissioning	Dust	Let me be specific. Construction on this scale will generate significant airborne dust over a prolonged period. That dust will not remain contained—it will travel across the valley, settle on our gardens, and impact plant health across twelve acres of carefully maintained grounds. It will affect our bee colonies, our homegrown produce, and the wider biodiversity we depend on. These are not theoretical concerns—they are well-established consequences of large-scale construction in exposed locations.	The Applicant acknowledges the concerns raised regarding potential construction dust effects on the hotel, its grounds and guests. However, the construction dust assessment presented in ES Volume 3, Appendix 15-1 Construction Dust Methodology and Assessment [APP-238] has been undertaken in accordance with best practice guidance and adopts a precautionary worst-case approach in relation to sensitive receptors. The assessment concludes that, with embedded mitigation measures in place, the Scheme would not give rise to significant adverse effects at human or ecological receptors. Mitigation measures

Reference	Theme	Issue	Comments	Applicant's Response
				to control dust emissions during construction are set out in the Outline CEMP [REP4-049] and include dust suppression and site management controls. The Applicant notes the specific concern regarding bee colonies. As the current arable baseline of the Solar PV Sites comprises of monoculture cropping and pesticide use, it is of relatively low value to pollinators. The Scheme's landscape strategy includes the creation of diverse permanent grassland and wildflower meadows, which will provide higher-value foraging and nesting habitats for bees and other invertebrates.
WM-003	Noise and Vibration	Noise Impact	The noise impact is equally serious. Our guests are not visiting a city hotel—they come for quiet, for birdsong, for stillness. Years of construction noise will not pause for weddings, spa guests, or couples who have travelled for a peaceful stay.	This matter has been addressed in the Applicant's Response to Written Representations [REP2-039], item WMH-003. In summary, construction noise would be below the existing ambient sound at the hotel.

Reference	Theme	Issue	Comments	Applicant's Response
				The Applicant further reiterates that the Scheme is located no closer than 1.5km from Whatley Manor Hotel, and as such, over this distance, noise from construction is considerably attenuated.
WM-004	Socio-Economics, Tourism and Recreation	Operational Standards	There is also a wider point. Our EarthCheck Gold status is not a label—it requires continuous, audited performance across energy, water, waste, biodiversity, and guest experience. This development threatens our ability to maintain that standard. It risks the ecological integrity of our grounds and places an ongoing operational burden on our team to manage the effects of prolonged industrial activity on our doorstep. In effect, we are being asked to absorb the environmental cost of a development from which we derive no benefit.	The Applicant refers to the response provided to 'ME-002' in [REP4-088] in relation to cost impacts to Whatley Manor and the EarthCheck status. The Applicant maintains that the Scheme will not undermine Whatley Manor's operational standards or ecological integrity. As the hotel and its grounds are located wholly outside the Order Limits, no direct impacts on the property's biodiversity or plant health are anticipated. The Environmental Statement identifies that potential adverse ecological effects are not expected to extend beyond the Order Limits, and the Scheme's significant habitat creation which includes flower rich

Reference	Theme	Issue	Comments	Applicant's Response
				neutral grassland and new woodland belt and is specifically designed to strengthen the wider ecological network rather than compromise it.
WM-005	Consultation and Engagement	Engagement	Finally, I must highlight that there has been no engagement with Whatley Manor. A leading hotel, employing over 100 people and welcoming around 10,000 guests annually—contributing significantly to the local economy—has not been consulted. We do not believe that is acceptable. Nor do we believe the impacts on properties like ours, in direct proximity of the project, have been properly assessed. We urge the Examining Authority to require that they are. Thank you.	The Applicant refers to the response provided to 'ME-004' in [REP4-088]. Whatley Manor Hotel was located within the 2km Core Consultation Zone for non-statutory and statutory consultation (see the Consultation Report [APP-022]) prior to DCO submission and therefore was invited to participate in respective consultation events or engagement opportunities. The primary reasons for Whatley Manor Hotel not being given additional consideration as a business receptor is due to: its distance from the Scheme at a minimum of 1.5km to the north of Lime Down B; intervening topography and vegetation largely limiting any visual impacts to clients at the hotel; and that the usual approaches to the hotel (particularly for guests travelling from afar) would be

Reference	Theme	Issue	Comments	Applicant's Response
				along routes that are negligibly affected by construction traffic (the A429 from M4 J17 to Malmesbury, or the A46 and B4039 from M4 J18 through Luckington and Sherston). As such, it was not considered that there were any assessment criteria that were not already being assessed in ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068] that applied specifically to Whatley Manor Hotel & Spa.

2.8 Steve Harvey

Table 2-8

Reference	Theme	Issue	Comments	Applicant's Response
SH-001	Socio-Economics, Tourism and Recreation	Cycling Club	Sherston Velo CC is a local cycle club with over 70 active members. I am speaking to you as an avid cyclist and ex chair of the club who has huge concerns on rider safety as a result of the proposed project. The benefits of club cycling is not only the companionship but is the safety. As a club we monitor risk constantly and is the main factor when planning a club ride. Members can be rest assured we have safety at the foremost of our minds. We organise both weekend and midweek rides. All of our rides start and finish in Sherston. We are currently privileged to be surrounded by safe roads.	The Applicant notes this comment.
SH-002	Socio-Economics, Tourism and Recreation	Cycling Club	It is with total dismay that the 'Lime down' project will completely destroy all of that. And will put all of our rides in jeopardy as	The Applicant refers to the response provided to 'PD-001' in the Written Summary of the Oral Submissions at

Reference	Theme	Issue	Comments	Applicant's Response
			well as other riders passing through the village.	the Open Floor Hearing 2 and the Applicants Responses [REP4-088].
SH-003	Transport and Access	Construction Traffic Impact on Cyclists	The altering of the roads leading to Sherston in particular the fosse way between Grittleton and the un metttled road by Ladyswood will now mean there will be hoards of large vehicles in the area never before seen. The general traffic will increase. It will almost be impossible to undertake rides without fear and trepidation of being involved in an accident.	In accordance with ISEP Transport and Access guidelines, fear and intimidation is based on the following: • The total volume of traffic • The heavy vehicle composition • The speed these vehicles are passing In accordance with Tables 3.1, 3.2 and 3.3 in ISEP Transport and Access guidelines, the change in traffic flow and heavy vehicle composition from trips generated by the Scheme do not result in a step-change in the magnitude of fear and intimidation. For example, and in accordance with Table 3.2, the Level of Fear and Intimidation on Bradfield Cottages does not result in a step change for to the

Reference	Theme	Issue	Comments	Applicant's Response
				degree of hazard score when using the criteria presented in Table 3.1. Existing: • 85veh/hour - 0 hazard score • 58 HGV's - 0 hazard score • Speed 30-40mph – 20 hazard score • Level of fear and intimidation is small (0-20) Existing plus dev • 95 veh/hour so will remain below 600 movements during the construction period, hazard score of 0 • 114 HGV's so will remain below 1,000 during the construction period. Hazard score of 0 • No change in speed hazard score 20

Reference	Theme	Issue	Comments	Applicant's Response
				Level of fear and intimidation is small (0-20) Using Table 3.3, any change to fear and intimidation would be Negligible as no step change in level of traffic.
SH-004	Transport and Access	Construction Traffic Impact on Cyclists	Large vehicles create a vortex which cyclists can get sucked into and so with the vast increase of such traffic in the area, the chances of cycling accidents will significantly increase.	The Applicant makes note of this comment. In accordance with the highway code 5.5 metres width is required to pass a cyclist. As shown in Annex I of ES Volume 3, Appendix 13-1: Transport Assessment [REP4-037] this width is shown at numerous point along the proposed construction routes. In addition, the Outline CTMP [REP4-057] includes text to advise drivers to adhere to the Highway code and drive carefully and give way where required.
SH-005	Transport and Access	Cycling Club	This will also be a lasting legacy as other businesses will now see this area as a 'rat run' that can be utilised so the danger to cyclists and other road users will be here	The Applicant refers to the response provided to 'SH-002' in the Written Summary of the Oral Submissions at

Reference	Theme	Issue	Comments	Applicant's Response
	Socio-Economics, Tourism and Recreation		forever. This legacy cannot be over emphasised. Cyclists will not want to pass through Sherston so readily and that will also affect small businesses such as the 'Court yard café' (Lucy Tom's) that rely on cyclists for revenue.	the Open Floor Hearing 2 and the Applicants Responses [REP4-088].
SH-006	Transport and Access	Construction Traffic Impact on Cyclists	Our relatively safe roads for cycling will disappear and cyclists will be faced with white knuckle rides, particularly along the fosse way as vehicles of all sizes fly passed at speed which they could not do before as the road was too narrow.	The Applicant makes note of this comment. In accordance with the highway code 5.5 metres width is required to pass a cyclist. As shown in Annex I of ES Volume 3, Appendix 13-1: Transport Assessment [REP4-037] this width is shown at numerous points along the proposed construction routes. In addition the Outline CTMP [REP4-057] includes text to advise drivers to adhere to the Highway Code and drive carefully and give way where required.
SH-007	Transport and Access	Impact on Cyclists	There is a large cohort of cyclists that pass through Sherston commuting to work. I am one of them. As a result of this project, I may have to stop that and become another vehicle	The Applicant notes this comment and refers to the response provided to 'PD-001' in the Written Summary of the Oral Submissions at the Open Floor Hearing

Reference	Theme	Issue	Comments	Applicant's Response
			adding to the countries emissions issue as I would be scared of the inherent danger.	2 and the Applicants Responses [REP4-088].
SH-008	Transport and Access Socio-Economics, Tourism and Recreation	Cycling Club	Overall, this project will have a massive effect on the ability to cycle with safety in the local area. I really believe this could affect sustainability of the club. This will ultimately undermine the very ethos of the club of bringing like minded people together to enjoy their sport, promote fitness and well being in a safe environment.	The Applicant notes this comment and refers to the response provided to 'PD-001' in Written Summary of the Oral Submissions at the Open Floor Hearing 2 and the Applicant's Responses [REP4-088] in which the Applicant confirms that impacts to PRoW, unsurfaced roads, and the recreational use of the highway network have been assessed in ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068] and the supporting ES Volume 3 Appendix 16-2 Tourism and Recreation Receptor Tables [APP-241]. Consideration of the likely impact on views, character and the desirability of these routes to users has been fundamental to the assessment of likely significant effects. The Applicant also seeks to highlight that during the operational lifetime of the

Reference	Theme	Issue	Comments	Applicant's Response
				Scheme, permissive paths, including those for equestrians and cyclists, are proposed across the Solar PV Sites to improve accessibility and connectivity across the PROW network. These are shown on ES Volume 2, Figures 3-4-1 to 3 4-5.2 Landscape and Ecology Mitigation Plans [REP1-029, REP1-030, REP1-032 and REP3-037] and secured through the Outline LEMP [REP3-100]. This is secured through the detailed design stage by Requirements 5 and 7 in Schedule 2 to the Draft DCO [REP4-004]. See response to TT1.18 in The Applicant's Response to the Examining Authority's First Written Questions [REP3-128]. This sets out how the likely effects of the scheme in relation to Non-Motorised Users has been assessed and supports the conclusion of no significant effects presented in ES Volume 1, Chapter 13 Transport and Access [REP4-014]. It also sets out how specific mitigation and measures within

Reference	Theme	Issue	Comments	Applicant's Response
				the Outline CTMP [REP4-057] will take account of Non-motorised Users.

2.9 Wiltshire Council

Table 2-9

Reference	Theme	Issue	Comments	Applicant's Response
WC-001	Land interests	Book of Reference	1.4 The BoR identifies Wiltshire Council in different capacities. In some instances, the council is identified as highway authority. In others, it is identified as reputed owner or occupier. In others, its interest appears to be only in respect of a public footpath or byway. 1.5. Many of these entries are inaccurate and, in many cases, conflate Wiltshire Council's capacity as highway or Public Rights of Way (PRoW) authority with that of a landowner. 1.6. The table in the council's response to ExQ1 CA1.17 [REP3-142] should be used as the council's current correction schedule and Appendix A to this submission contains a separate Excel file detailing the resulting amendments sought to the BoR. In summary, the inaccuracies in the BoR relate to:	The Applicant notes Wiltshire Council's Relevant Representation in relation to the Book of Reference (Document 4.3) and the matters set out in Appendix A. Following engagement with Wiltshire Council, the Applicant confirms that Wiltshire Council will be removed from the Book of Reference as reputed owner in respect of plots 01-007, 01-008, 03-059, 03-061, 03-064, 04-010, 04-011, 04-015, 06-024, 08-001, 11-012, 11-013, 15-002, 15-004, 15-005 and 15-020. The Applicant will ensure that the Book of Reference is updated accordingly at the next appropriate opportunity. In relation to the Council's comments regarding Public Footpath SHER18, the Applicant has reviewed the information provided by Wiltshire Council and confirms that the available highway data identifies SHER18 as running to the

Reference	Theme	Issue	Comments	Applicant's Response
			• No ownership record / not maintainable highway – plots where the BoR identifies Wiltshire Council as reputed owner or occupier, but the council has no ownership record and the land is not shown as maintainable highway; • PRoW only interests – should not be presented as council ownership interests; • Partial or uncertain highway status – plots where the highway position is unclear or only part may be maintainable highway; • Further information required – specific points should be clarified such as the pond or drainage feature at plot 08-001 and the potential Network Rail issue at plot 03-049. 1.7. Of the 23 entries in the CA1.17 table, Wiltshire Council's current position is that only 7 appear likely to reflect a legitimate council interest that should remain in 5 the BoR: 5 as PRoW / highway authority	south of plots 03-004, 03-007 and 03-009. On that basis, SHER18 is not affected by, nor situated within, the plots identified by the Council. The public footpath has been correctly referenced against plots 01-042, 03-001, 03-006 and 03-008 in the Book of Reference and subsequent revisions. The Applicant is therefore satisfied that the route and extent of SHER18 have been accurately represented within the application documents. The Applicant also notes the Council's comments regarding its inclusion within the Book of Reference as highway authority. The Applicant confirms that Wiltshire Council has been included in that capacity in respect of plots 02-012, 03-061 and 15-003 only, and not in respect of plot 03-059. This approach reflects the highway information supplied by Wiltshire Council, which identifies the Council as the authority responsible for maintaining the relevant sections of public highway within those plots. The Applicant therefore considers its inclusion

Reference	Theme	Issue	Comments	Applicant's Response
			interests only, and 2 as partial or uncertain maintainable highway interests. Plot 08-001 may also need to remain if further asset checks confirm a Wiltshire Council drainage or highway asset interest. The remaining entries should be removed or corrected unless the Applicant provides evidence of Wiltshire ownership, occupation, maintainable highway, apparatus or another relevant interest. 1.8. The council asks that these be corrected before CA or temporary possession powers are confirmed.	within the Book of Reference to be accurate and justified. Accordingly, with the amendments identified above, the Applicant considers that the matters raised by Wiltshire Council have been appropriately addressed.
WC-002	Compulsory Acquisition	Unfettered CA Powers Not Justified	1.9. The Applicant's project need, in relation to Wiltshire Council's interests, is limited to matters such as construction traffic, street works, cable works, access works, temporary traffic management, highway alteration, apparatus, reinstatement and maintenance. 1.10. The Applicant's own Statement of Reasons [APP-018] (SoR) identifies powers for these	As set out in the Written Summary of the Applicants Oral Submissions and Responses at Compulsory Acquisition Hearing 1 and Responses to Action Points [REP4-084] at pages 5 and 6, the Applicant had taken a precautionary approach to recording Wiltshire Council's interest in plots that were unregistered strips of land or verges adjacent to the highway.

Reference	Theme	Issue	Comments	Applicant's Response
			purposes: street works powers, alteration of streets, temporary closure and restriction of streets and public rights of way, access powers, traffic regulation powers, temporary possession, and maintenance-related powers. 1.11. In any event, in the majority of plots Wiltshire Council is only the highway authority – the highway is usually not owned by the highway authority, and the adjacent landowner will usually retain the subsoil under the ad medium filum presumption. 1.12. Therefore, if the Applicant acquires the underlying estate or subsoil of land currently subject to highway rights, it may obtain a proprietary interest wider than needed for construction traffic, cable installation or apparatus protection. If the highway were later stopped up, the Applicant could hold a residual proprietary interest unrelated to any demonstrated scheme need.	The Book of Reference [EN010168/APP/4.3] (Revision 4) has been updated at Deadline 5 to remove Wiltshire Council's interests from plots that the Council does not consider it holds an interest in that had been previously included on a precautionary basis.

Reference	Theme	Issue	Comments	Applicant's Response
			1.13. The SoR does not address that risk. It does not explain why acquiring subsoil or freehold in highway-related land is required where the stated need is use of the surface, temporary traffic management or apparatus. 1.14. If the Applicant needs flexibility before detailed design, the proportionate mechanism is temporary possession, survey powers, and Wiltshire Council's consent where highway / local road network land is affected. It is not premature acquisition of freehold, subsoil or permanent rights over incorrectly attributed Wiltshire Council land. 1.15. However, the council acknowledges that there may be limited and unforeseen circumstances in which the Applicant can properly demonstrate a need to acquire an interest held by Wiltshire Council, or an interest in the subsoil of land affected by highway rights, in order to construct, operate, maintain or decommission the authorised development.	

Reference	Theme	Issue	Comments	Applicant's Response
			1.16. If, in a particular case, the Applicant considers that acquisition of a Wiltshire Council interest, or acquisition of land or highway subsoil owned by Wiltshire Council, is necessary, the exercise of that power should be subject to the council's prior written consent, not to be unreasonably withheld or delayed. This mechanism has been included by the council in article 17 of its preferred protective provisions. 1.17. This consent mechanism is proportionate and allows the Applicant to respond to unforeseen engineering or delivery constraints, while ensuring that Wiltshire Council retains proper control over the acquisition or interference with council land, highway land, subsoil, apparatus, public rights of way and local road network assets.	
WC-003	Compulsory Acquisition	Wiltshire Council's Preferred Protective Provisions	1.18. Where the land is local road network land, or land owned by Wiltshire Council, or land in which the council holds highway apparatus or rights, the appropriate	Both the Applicant and Wiltshire Council provided their preferred versions of the protective provisions at Deadline 4.

Reference	Theme	Issue	Comments	Applicant's Response
			mechanism for dealing with CA / TP of Wiltshire Council's highway / interests should be via its protective provisions. 1.19. Wiltshire Council's preferred protective provisions (contained in Appendix B) contain necessary technical, safety and asset-protection controls. They require prior approval, detailed design information, traffic management, road safety audits, condition surveys, damage redress, cost recovery, security, maintenance until final certificate, indemnity, reinstatement, and a land acquisition consent mechanism. 1.20. Accordingly, the draft Development Consent Order (dDCO), with the inclusion of the council's preferred protective provisions, already contains a suite of operational powers which are capable of authorising the development without the need for unfettered CA / TP powers over Wiltshire Council's interests or highway land.	Given the productive discussions between the Applicant and Wiltshire Council to date regarding the draft protective provisions for its benefit as local highway authority, the Applicant considers protective provisions are likely to be agreed before the end of examination. The Applicant provided its amendments to Wiltshire Council, together with reasons, on 30 June 2026. The Applicant is awaiting the Council's comments.

Reference	Theme	Issue	Comments	Applicant's Response
			1.21. The approach in the preferred protective provisions are not exceptional. They are an orthodox and widely accepted mechanism for making otherwise broad DCO powers acceptable where local highway functions are affected. 1.22. Until the corrections and amendments to the BoR and dDCO suggested herein are made, the council maintains its objection to the CA and TP powers insofar as they affect Wiltshire Council, the local road network, public rights of way, highway apparatus, or land incorrectly attributed to the Council.	
WC-004	Issue Specific Hearing (ISH2): Landscape and Visual Impact	Landscape Fabric	2.1. Wiltshire Council considers that the built element and land use component of landscape fabric are critical to understand how human influence and the overall coherence of landscape differs. 2.2. A landscape fabric assessment would consider the individual components and elements of the landscape individually.	2.1 The definition of Landscape Fabric and Landscape Character has been consistently set out within ES Volume 1 Chapter 8 Landscape and Visual [REP3-025] and supporting Appendices, including within the ES Volume 3 Appendix 8-1 Landscape and Visual Impact Assessment

Reference	Theme	Issue	Comments	Applicant's Response
			This would include the green elements, the manmade elements and also consider the change in terms of the introduction of new elements, including a change of land use. It would also consider the perceptual and aesthetic experience and understanding of that. For example, noise, relative tranquillity and perceptual experience. 2.3. The difference from a landscape character assessment is that when you're assessing character, they all come together and the assessment would consider how that is grouped together into an overall understanding of character. 2.4. This can be summarised as follows: Landscape component (individual) > Landscape fabric (grouped components) > Landscape character (combined effects of these component changes on overall character). 2.5. The introduction of solar PV panels and frames into a field, would change the colour of the land from a green field and	Methodology [REP1A- 006] from submission at Scoping to Examination and the Methodology was agreed with Wiltshire Council. It is appreciated that Wiltshire applies a different approach (and definition) to Landscape Fabric, However, as set out in the Technical Note on Landscape Fabric and Landscape Character [REP1-121], the assessment on Landscape Fabric is an independent and separate assessment to that undertaken on the effects of the Scheme on Landscape Character. ES Volume 1 Chapter 8 Landscape and Visual [REP3-025] has undertaken a robust assessment on Landscape Character. However, following ISH2, the applicant is preparing a Landscape Character Assessment of Character Areas following a request by the ExA (Action Point 14 and 15). This will be submitted at Deadline 5 and will consider the effects of the Lime Down Scheme on the key characteristics; inherent landscape sensitivities; and broad management

Reference	Theme	Issue	Comments	Applicant's Response
			also its texture would change. The fabric component of the field parcel and the vegetation will have been perceptually lost, which influences the wider perceptions of character. The council considers that it's important to understand the fabric components and how they contribute to the characteristics of the site in the wider context and also how the prevalence of those changes influence wider character. 2.6. The council confirmed that its concerns were similar to that expressed by Stop Lime Down (SLD), in that irrespective of the definition of landscape fabric, the Applicant has not included manmade features within the assessment. The assessment has also not considered the perceptual aspect. Therefore, only a partial assessment has been undertaken.	objectives for the Landscape Types and corresponding Landscape Character Areas as defined in the Wiltshire County Assessment and the Local North Wiltshire Assessments. 2.2 The Applicant notes that the above approach differs from the methodology agreed with WC through the pre submission consultation process. However, the Applicant wishes to express that ES Volume 1 Chapter 8 Landscape and Visual [REP3-025] has undertaken a robust assessment on Landscape Character which includes consideration of all of the components/elements etc set out by WC above. The Applicant's Assessment on Landscape Character Areas (as opposed to Study Areas in the LVIA) will consider the effects of the Lime Down Scheme on individual components and elements of the landscape as defined by the key characteristics/key features for the

Reference	Theme	Issue	Comments	Applicant's Response
				relevant Landscape Character Areas scoped into the LVIA. It is noted that the perceptual and aesthetic experience and understanding of landscape is defined in the "Inherent Landscape Sensitivities" and will be considered within the Applicant's Landscape Character Assessment of Character Areas. The applicant considers that this assessment has already been undertaken in ES Volume 1 Chapter 8 Landscape and Visual [REP3-025] within the Assessment of Landscape Character (which includes built elements and land use change) with the key difference relating to the Study Area Approach. Justification of the Study Area Approach has been previously expressed (refer to the Applicant's response to the ExA first written Questions LV1.6 [REP4-081] and relates to the scale of the Character Areas in relation to the scale of the effects of the Scheme; i.e.:

Reference	Theme	Issue	Comments	Applicant's Response
				where the localised effects of the Scheme (within the 1km Study Area) are diluted when considered against a large Character Area, such as the Hullavington Rolling Lowland. 2.3 ES Volume 1 Chapter 8 Landscape and Visual [REP3-025] has undertaken a robust assessment on Landscape Character. Whilst assessing the effects of the Lime Down Scheme on the individual components of the landscape/ Key features and Inherent Landscape Sensitivities, the Applicants Assessment of effects on the Character Areas will also consider how the Lime Scheme interacts with and affects the overall character of the landscape for each assessed Character Area. 2.4 ES Volume 1 Chapter 8 Landscape and Visual [REP3-025] has undertaken a robust assessment on Landscape Character. The Applicant's Assessment on Landscape Character Areas will draw on

Reference	Theme	Issue	Comments	Applicant's Response
				the findings of the Assessment on Landscape Fabric (and additional submissions) where appropriate when considering the effects on individual landscape components /key features of each character area. For example: for key feature 3 of the host landscape character area, the Hullavington Rolling Lowland-(LCA8) which is: "Continuous hedges with many mature oaks" quantities of hedgerow and tree losses and gains will be quantified and the combined effect considered against the overall character of the LCA and the objectives of the management guidelines. 2.5 ES Volume 1 Chapter 8 Landscape and Visual [REP3-025] has undertaken a robust assessment on Landscape Character. The Applicant considers the physical change to fields, as a result of the introduction of solar PV panels, is to grassland (albeit overlain by solar) as set

Reference	Theme	Issue	Comments	Applicant's Response
				out Technical Note on Landscape Fabric and Landscape Character [REP1-121]. The Applicant agrees with WC that the perceptual change of the field to solar will be lost and will adversely affect the landscape character of the field's/ site's landscape context. The Applicants Assessment on Landscape Character recognises this land use change and perceptual change (with reference to the visibility of the Scheme) considers how those changes influence wider character. 2.6 The Applicant notes this comment and refers to the detailed response above.
WC-005	Issue Specific Hearing (ISH2): Landscape and Visual Impact	Landscape Fabric	2.7. Within Wiltshire Council's response to ExQ1 LV1.2 [REP3-142], the council highlighted the pertinent GLVIA3 extracts within its response, namely sections 5.35, 5.36, 5.48 and 5.49. The council considers that as stated in 5.35, the change in, partial or complete loss of elements, features or aesthetic or perceptual aspects that individually contribute to the	2.7 ES Volume 1 Chapter 8 Landscape and Visual [REP3-025] has undertaken a robust assessment on Landscape Character. However as noted above, the Applicant will undertake a Landscape Character Assessment of Character Areas which will assess the effects of the Lime Down

Reference	Theme	Issue	Comments	Applicant's Response
			character would be considered first, including the addition of new features that will influence character, and that these must be considered on an individual basis before the overall character is considered. 2.8. Section 5.49 of GLVIA3 sets out how the consideration of landscape features should be addressed. Initially the proportion that will be lost and gained should be considered, and then the degree to which the aesthetic or perceptual aspects would be altered.	Scheme on the individual components and elements of the landscape as defined by the key characteristics/key features for the relevant Landscape Character Areas and aesthetic or perceptual aspects of the landscape. 2.8 ES Volume 1 Chapter 8 Landscape and Visual [REP3-025] has undertaken a robust assessment on Landscape Character. As noted above, the Applicant's Assessment on Landscape Character Areas will draw on the findings of the Assessment on Landscape Fabric (and additional submissions) where appropriate when considering the effects on individual landscape components /key features of each character area. For example: for key feature 3 of the host landscape character area, the Hullavington Rolling Lowland- (LCA8) which is: "Continuous hedges with many mature oaks" quantities of hedgerow and tree losses and gains will

Reference	Theme	Issue	Comments	Applicant's Response
				be quantified and the combined effect considered against the overall character of the LCA (including the aesthetic or perceptual aspects) and the objectives of the management guidelines.
WC-006	Issue Specific Hearing (ISH2): Landscape and Visual Impact	Landscape Fabric	2.9. The council also raised concern that the assessment of landscape fabric appeared to be limited to the solar PV sites, as opposed to the wider study area. Therefore, it is unclear whether there are additional effects that have not been included and considered.	As defined in the definition of Landscape Fabric, the assessment on Landscape Fabric assesses the effects on: "the constituent elements of the landscape (the Landscape Fabric) being the individual tangible elements or features of the landscape, such as landform, woodland, hedges, tree cover, vegetation within the development area or site, for example which can usually be described and quantified". It is a separate assessment and independent assessment to the Assessment on Landscape Character.
WC-007	Issue Specific Hearing (ISH2): Landscape and Visual	Landscape Fabric	2.10. The council welcomed the Applicant's clarification that visibility splays had been included within the	The Applicant notes this comment.

Reference	Theme	Issue	Comments	Applicant's Response
	Impact		calculations with respect to the loss of hedgerows.	
WC-008	Issue Specific Hearing (ISH2): Landscape and Visual Impact	Landscape Fabric	2.11. Wiltshire Council also confirmed that it did not consider that simply managing an existing hedgerow to grow taller to 4.5m is an addition to the landscape fabric. Allowing hedgerows to grow to 4.5m may have beneficial effects from an ecological perspective, however without understanding of what the hedgerow is intended to screen or how that might influence the perceptual aspects of the specific location, it may not represent a positive addition.	The Applicant notes this comment. Although the Applicant recognises that allowing hedgerows to grow taller is an aspiration of the Wiltshire and Swindon Local Nature Recovery Strategy, the LVIA has considered where the loss of open views, for instance will change the perception of the landscape. The assessment of Landscape Character (and Visual Amenity) recognises the adverse effects associated with the proposed high hedgerows required to provide screening of the Array and associated infrastructure. The Applicant would like to reiterate that ES Volume 1 Chapter 8 Landscape and Visual [REP3-025] does not identify beneficial effects to Landscape Character as a result of the implementation of the landscape scheme

Reference	Theme	Issue	Comments	Applicant's Response
				during the construction period or operational lifetime of the Scheme.
WC-009	Issue Specific Hearing (ISH2): Landscape and Visual Impact	Landscape Fabric	2.12. With respect to legacy benefit, the council indicated that as this was not controlled at all within the scheme documentation, it was considered that it could not be counted as a benefit of the scheme as it was completely unknown as to what would happen post decommissioning.	As set out in the Applicant's response to the Examiners First Questions [REP3-128] at LV1.3, hedgerow management at decommissioning will be secured within the Outline Decommissioning Strategy [REP1-100] as detailed in the Outline LEMP [REP3-100]. Following successful removal of panels and associated infrastructure, all hedgerows within the Order Limits will be assessed to consider best ecological and land management practices applicable at the time of decommissioning. Consideration should be given to hedgerow heights, widths, overall plant health, species diversity, landscape character, visual amenity, as well as use by protected or notable wildlife species etc. If appropriate at the time, measures to reduce the height of hedgerows to their

Reference	Theme	Issue	Comments	Applicant's Response
				current heights would take place during the two-year decommissioning phase and would be programmed to follow the removal of infrastructure to ensure that landscape and visual effects are as assessed in the LVIA. Any cutting to reduce heights of hedgerows would take place outside of the key nesting bird season in line with best practice.
WC-010	Issue Specific Hearing (ISH2): Landscape and Visual Impact	Landscape Fabric	2.13. In summary, the council considers that: • The Applicant's assessment conflates assessment of landscape fabric with wider landscape character. • The council maintains its view that the Applicant's assessment of landscape components (Landscape fabric) represents a partial and incomplete assessment. • The assessment of fabric doesn't include 'land use' as a key component fabric receptor, or include within its scope any built fabric components, effects from	In ES Volume 1 Chapter 8 Landscape and Visual [REP3-025], the Applicant has robustly assessed the effects on Landscape Character independently to the assessment on Landscape Fabric. The assessment on Landscape Character includes aesthetic or perceptual aspects of the land use change from arable farmland to pasture overlaid by solar panels. The Applicant notes these relevant representations which were responded to in PDA-009 at WC-057. A Technical Note on Landscape Fabric and Landscape

Reference	Theme	Issue	Comments	Applicant's Response
			changes to vegetation management, or include aesthetic or perceptual aspects. • The council has identified what it considers the shortcoming are with the assessment of landscape fabric within its Relevant Representation [RR-4934] in paragraphs 8.27 to 8.31. • The council has identified what it considers should be included within the assessment of landscape fabric within its written response to ExQ1 LV1.2 [REP3-142], including references to relevant sections of 'Guidelines for Landscape and Visual Impact Assessment (third edition)' (GLVIA3) to substantiate its position.	Character [REP1-121] was submitted at Deadline 1 to explain that the LVIA in ES Volume 1 Chapter 8 Landscape and Visual [REP3-025] has "assessed Landscape Fabric and Landscape Character independently as two separate receptors. Landscape Fabric relates only to land within the Order Limits of the Scheme and refers only to the physical elements and features within each of the five Lime Down Solar Sites and the physical changes they undergo". It is the Applicant's understanding that the ExA's request for the Applicant to prepare a Landscape Character Assessment of Character Areas (Action Point 14 and 15 of ISH2) addresses Wiltshire Council's concerns regarding this matter. The ExA's request is provided below for ease of reference: "Action 14: Provide an assessment of how the Limestone Lowland landscape type and its sub-divided Landscape Character

Reference	Theme	Issue	Comments	Applicant's Response
				Areas would be affected including reference to the: - key characteristics; - Inherent landscape sensitivities; and - broad management objectives. Action 15: Applicant Provide an assessment of how the key characteristics of the relevant landscape character types (Limestone Lowland and Hullavington Rolling Lowland) would be impacted by cumulative developments. Explain whether the key characteristics of the character types would be so changed by the cumulative developments as to transform it into a different landscape type." This Assessment on Landscape Character Areas will be submitted at Deadline 5 and will consider the effects of the Lime Down Scheme on the key characteristics; inherent landscape sensitivities; and broad management objectives for the Landscape Character Areas scoped into the assessment as defined in the Wiltshire

Reference	Theme	Issue	Comments	Applicant's Response
				County Assessment and the Local North Wiltshire Assessments.
WC-011	Issue Specific Hearing (ISH2): Landscape and Visual Impact	The Cotswolds National Landscape	The Setting of the CNL 2.14. In terms of the setting of the Cotswolds National Landscape (CNL), Wiltshire Council considers that it should be informed by its Special Qualities. Natural Beauty and Historic and Cultural Value are special qualities which extend beyond the boundaries of the CNL. There are areas outside the designated boundaries which contribute to the experience, special qualities, significance and functional connectivity of the National Landscape. Setting is not just about what is seen, it also includes consideration of character, aesthetic and perceptual aspects and how it is experienced. 2.15. The CNL setting should consider recreation as well as character, but also the intactness of its context. This is a	The Applicant's view on the setting of the CNL has been informed by the CNL's Position Statement – Development in the setting of the Cotswolds AONB) which considers the setting of the Cotswolds AONB to be “the area within which development and land management proposals, by virtue of their nature, size, scale, siting materials or design can be considered to have an impact, positive or negative, on the landscape, scenic beauty and special qualities of the Cotswolds AONB”. The Statement clarifies references to setting from the Cotswolds AONB Management Plan: “The surroundings of the Cotswolds AONB are also important to its landscape character and quality. There are views out of the AONB and across back into land within the AONB and views towards or into it from surrounding areas, all of which can be very significant.

Reference	Theme	Issue	Comments	Applicant's Response
			deeply rural, unified, coherent setting of countryside, and the development will encroach and fragment that integrity.	Development proposals that affect views into and out of the AONB need to be carefully assessed to ensure that they conserve and enhance the natural beauty and landscape character of the AONB". With reference to the drawings in Annex E LV1.9 – Spatial Extent of the Setting of the Cotswold National Landscape (PDF page 603) [REP3-128], the Applicants recognition of the Setting of the CNL has been derived following on site examination of intervisibility between the Scheme and the CNL (which has also been tested through the use of sections in Annex F [REP-3-128]) and through a robust assessment of the Special Qualities of the CNL (Appendix 8-6 [APP-197]) and Landscape Character within ES Volume 1 Chapter 8 Landscape and Visual [REP3-025]. The Layout of the Scheme has been developed following the iterative design process, on site meetings and development of the avoidance measures

Reference	Theme	Issue	Comments	Applicant's Response
				on the edge of the CNL as part of the ES and Examination. With reference to the Applicant's response to the EXA's first questions [REP3-128] in consideration of the above and with reference to Volume 3, Appendix 8.6: Assessment of Effects on the Cotswolds National Landscape and its Special Qualities [APP-197] the applicant has prepared a plan showing the Spatial Extent of Setting of the CNL which is in Annex E LV1.9 – Spatial Extent of the Setting of the Cotswold National Landscape (PDF page 603) [REP3-128]. With reference to the drawings in Annex E LV1.9, the Applicants recognition of the Setting of the CNL has been derived following on site examination of intervisibility between the Scheme and the CNL (which has also been tested through the use of sections in Annex F [REP-3-128]) and through a robust assessment of the Special Qualities of the CNL

Reference	Theme	Issue	Comments	Applicant's Response
				(Appendix 8-6 [APP-197]) and Landscape Character within the LVIA [REP3-025]). The Layout of the Scheme has been developed following the iterative design process, on site meetings and development of the avoidance measures on the edge of the CNL as part of the ES and Examination. The Applicant also notes that due to the Scheme's location on the edge of the CNL, avoidance measures have been incorporated into the Scheme Design as part of the Mitigation Hierarchy as set out in Section 8.9 of ES Volume 1 Chapter 8 Landscape and Visual [REP3-025] and the standalone assessment on the CNL in Appendix 8-6 in ES Volume 3 Appendix 8-6 Assessment of Effects on the Cotswolds National Landscape and it's Special Qualities [APP-197]. The ES Volume 1 Chapter 8 Landscape and Visual [REP3-025] and ES Volume 3 Appendix 8-6 Assessment of Effects on the Cotswolds National Landscape

Reference	Theme	Issue	Comments	Applicant's Response
				and it's Special Qualities [APP-197] have fully assessed the visual effects of the Lime Down Scheme on key recreational routes to and from the CNL. Although some significant adverse effects were identified, the majority of these were not considered to be within the setting of the CNL due to the avoidance measures embedded within the Scheme to protect the CNL and its setting. Long term adverse effects were assessed for Alderton Road (Transport Receptor TR038) as a result of proposed solar infrastructure in Field C9 due to the time it would take new hedgerow planting to mature to provide screening mitigation. As a result of this, Field C9 has been removed from the Scheme.
WC-012	Issue Specific Hearing (ISH2): Landscape and Visual	The Cotswolds National Landscape	2.16. Wiltshire Council considers that the setting of the CNL extends beyond its designated boundary into Lime Down Area A, B and C, particularly in relation to	The Applicant notes this comment. The Applicant considers that if the landscape to the north-west of the Fosse Way shares the rural character, special qualities and wider landscape

Reference	Theme	Issue	Comments	Applicant's Response
	Impact		the Fosse Way corridor and the land to its north-west. 2.17. The National Landscape boundary follows the northern edge of the DCO Order Limits at Foxley, passes south of Sherston, and continues along the western edge of the boundary at Alderton. The Fosse Way runs north-east to southwest through the National Landscape, with a gap of around 5km where it leaves the designation near Foxley before re-entering it between Alderton and Grittleton. This corridor is well used for recreation and functions as a recognised route (including the Wiltshire Cycleway) through the wider National Landscape. 2.18. Wiltshire Council considers: • The land adjacent to and north-west of the Fosse Way shares the rural character, special qualities and wider landscape associations of the National Landscape and is very much complimentary to it. This is because the route provides an	associations of the National Landscape, that it would be within the boundary of the designation. With reference to the North Wiltshire Landscape Character Assessment, which provides a finer grain of assessment than the Wiltshire County Assessment, land within the CNL is characterised differently than the Hullavington Rolling Lowland (LCA 8), separating it from the Upper Avon Valley (LCA6) to the north and the Sherston Dipslope Lowland (LCA7) to the east, whose boundaries are both contiguous with the CNL boundary. It is also worth noting that the LCT 11 Dip Slope Lowland identified in the Landscape Character of the Cotswolds National Landscape notes "The Dip-Slope Lowland "forms a broad area of gently sloping, undulating lowland with a predominantly south-easterly fall, and provides the final transition between the high Cotswold country and the Thames Valley".

Reference	Theme	Issue	Comments	Applicant's Response
			important recreational connection both within the designated area and into the surrounding countryside. • The Fosse Way and the land to its north-west form an integral part of the setting of the CNL and which, under the current proposals, will be significantly adversely affected by swathes of solar arrays and infrastructure, that will disrupt its unifying character, which is tantamount to the industrialisation of this highly rural landscape.	In this respect of the above and in respect of the on-site observations on landscape character, such as the distinct lack of dry-stone walls, and more intimate character associated with smaller field sizes found within the CNL, the Applicant politely disagrees that the landscape to the north-west of the Fosse Way shares the rural character, special qualities and wider landscape associations of the National Landscape. As noted above, the Applicant's view on the setting of the CNL has been informed by the CNL's Position Statement – Development in the setting of the Cotswolds AONB) which considers the setting of the Cotswolds AONB to be “the area within which development and land management proposals, by virtue of their nature, size, scale, siting materials or design can be considered to have an impact, positive or negative, on the landscape, scenic beauty and special qualities of the Cotswolds AONB”.

Reference	Theme	Issue	Comments	Applicant's Response
				With reference to the Technical Note on Cumulative Sequential Visual Effects [REP1-123] prepared by the Applicant for Deadline 1, "The LVIA accepts that there are Moderate Adverse effects on the visual amenity of users of the Fosse Way as a result of the Scheme as set out within ES Volume 3, Appendix 8-3-2-2 LVIA Assessment Sheets (Significant) [APP-191] ".
WC-013	Issue Specific Hearing (ISH2): Landscape and Visual Impact	The Cotswolds National Landscape	Proposed Layout of Solar Panels 2.19. The council considers that although a number of fields containing solar panels, which had a direct visual impact on the CNL have been removed from the proposals, there are substantial areas of solar array and infrastructure development in Lime Down Areas A, B and C, which fall within the setting of 10 the CNL. This is despite agreement that it is a landscape of high sensitivity, thereby fulfilling the	With reference to the Applicant's Response to Comments Received at Deadline 2 [REP3-129] at WCWR-002: The CNL as a designated landscape is recognised as High Value, High Susceptibility and High Sensitivity. Recognising that the Scheme is not within the CNL itself but that parts of Lime Down Sites A, B and C are within its setting, landscape character within the 1 km and 2km Study Areas have been assessed as High Value, Medium Susceptibility and High to Medium Sensitivity. Sites D and E within the 1km and 2km Study Areas are

Reference	Theme	Issue	Comments	Applicant's Response
			criteria to form a legitimate part of the setting of the National Landscape. 2.20. It must therefore be accepted that the wholesale change of use and industrialisation of swathes of the CNL setting will result in significant harmful effects, which is at odds with the purpose of the setting.	assessed as Medium Value, Medium Susceptibility and Medium Sensitivity. The Applicant considers that this does take account of localised landscape variations, Within the 5km Study Area, in recognition that much of the area is influenced by the CNL Sites A, B and C are assessed as High Sensitivity with Sites D and E as Medium Sensitivity. This concurs with the Stop Lime Down assessment, that the sensitivity of the landscape falls across the site from west to east. The Applicant considers the setting of the CNL to extend across parts of Lime Down A, B and C, but not across the entirety of the three sites. The applicant has prepared a plan showing the Spatial Extent of Setting of the CNL which was submitted within the Applicant's Response to the Examining Authority's First Written Questions [REP3-128]. As noted above, ES Volume 1 Chapter 8 Landscape and Visual [REP3-

Reference	Theme	Issue	Comments	Applicant's Response
				025] concluded that “the significant adverse landscape effects within the 1 km local study area are primarily related to the change in land use from agriculture to the solar farm. This change does not directly affect the CNL as the buffer to the development provided by the avoidance measures and layers of proposed mitigation planting contains the development away from the edge of the CNL. As such, the development would be barely discernible from within the CNL. Harm to the CNL itself would be minimal, (lasting as long as it takes for the planting to become appropriately established) with beneficial landscape effects within the setting of the CNL having effect in the long term, including as a legacy following decommissioning of the Scheme, which would further the purposes of the designation” (Paragraph 8.10.123).
WC-014	Issue Specific Hearing (ISH2):	The Cotswolds National Landscape	2.21. Wiltshire Council is particularly concerned with the Fosse Way route, which is approximately a 5km route that runs through the DCO site and connects	The Fosse Way, as it passes through the Scheme is not within the CNL and as noted previously, the Applicant considers that if the landscape to the north-west of

Reference	Theme	Issue	Comments	Applicant's Response
	Landscape and Visual Impact		sections of the CNL. The receptors using the route are generally using it as a rural route for recreational purposes and as it's a tranquil, rural route, the users of that area are a key visual receptor as well. The route is incredibly popular and there are connection through and off the Fosse Way into the CNL, and it shares a number of the special qualities with the CNL as well. 2.22. The council considers that the visual impacts to users of the Fosse Way are so significant that the areas of solar PV should be removed from the scheme. This is because the CNL boundary in this area is unusual, it almost a right angle where A, B and C are located and the Fosse Way transects those two boundaries. This triangular area is highly intact and the edges of the CNL are slightly elevated along each of those boundaries, as is the Fosse Way. 2.23. The Fosse Way is a rolling ridgeline, which is almost akin to a sloping basin,	the Fosse Way shares the rural character, special qualities and wider landscape associations of the National Landscape, that it would be within the boundary of the designation. The intra project effect of the Scheme on the Fosse Way have been assessed in the Technical Note on Cumulative Sequential Visual Effects [REP1-123] which concluded there are Moderate Adverse effects on the visual amenity of users of the Fosse Way as a result of the Scheme (Sites B and C) as set out within ES Volume 3, Appendix 8-3-2-2 LVIA Assessment Sheets (Significant) [APP-191]. The sequential assessment in [REP1-123] notes the changing topography along the Fosse Way and where there are longer distance views over the landscape. The Fosse Way does not follow a ridgeline but crosses higher points in two locations through the Lime Down Scheme; at 103m

Reference	Theme	Issue	Comments	Applicant's Response
			which is overlooked by two boundaries of the Lime Down Sites A and B. The area specifically being referred to was stated as Alderton Road going towards Whidley's Farm. 2.24. The council confirmed that its position was not that no development could take place in this area; it was that the proposed development was of such scale and the magnitude of land use change so great, that it is as a result of how this development manifests on the overall character and quality of the setting. The development would effectively try to screen all views of the countryside in order to make the proposal acceptable.	AOD near VP14 and at 110m AOD near VP 23. It then rises again from the railway line crossing to 105mAOD at VP 25 (Fosse Lodge) on the boundary of the CNL. The topography along the Fosse Way is typical of Hullavington Rolling Lowland with gently rolling hills and shallow valleys. At a distance of nearly 2.5km from Widleys Farm (Receptor RI014) on Alderton Road which follows the CNL boundary (near Viewpoint WC1) there is no intervisibility between the CNL and the Fosse Way. The Applicant notes that since the PEIR layout the considerable areas of solar infrastructure have been removed from along the Fosse Way, particularly to the unsurfaced section defined as a BOAT to reduce the scale of landscape and visual change and maintain views of the countryside.

Reference	Theme	Issue	Comments	Applicant's Response
WC-015	Issue Specific Hearing (ISH2): Landscape and Visual Impact	The Cotswolds National Landscape	Effects on the Special Qualities of the CNL 2.25. With respect to Tranquillity, the council notes that within the CNL Board's Comments on Submissions received at Deadline 2 [REP3-154], relating to Wiltshire Council's review of the Applicant's submitted Tranquillity Technical Note [REP3-142] as contained within the council's Written Representation [REP1-138], it states: 'The Board shares the view expressed by Wiltshire Council in their written representations at Deadline 1 (REP1-138) that the Tranquillity Technical Note mainly repeats information from the ES, particularly that relating to Transport and Access (i.e. ES Chapter 13) and noise and vibration (i.e. ES Chapter 14). Our understanding is that the content of these ES chapters was scoped and agreed with no input from a tranquillity / landscape viewpoint and these chapters do not consider the Board's Management	Further to the Technical Note on Tranquillity, the Applicant has submitted a Tranquillity Assessment [EN010168/EXAM/9.56] at Deadline 5.

Reference	Theme	Issue	Comments	Applicant's Response
			Plan policy CE5 11 (Tranquillity) or the Board's Tranquillity Position Statement. An example of this is observed by Wiltshire Council in REP1-138 that "although tranquillity is considered to be a considerable asset of landscape (Guidelines for Landscape and Visual Impact Assessment (LVIA) (3rd edition) glossary page 158) the survey work has been predicated on standard noise modelling methodology and acoustic modelling software (ISO 9613:2024) utilising the Lowest Observable Adverse Effect Level (LOAEL) and Significant Observable Adverse Effect Level (SOAEL) for construction and operational noise" 2.26. The council will review the Applicant's additional Technical Note on Tranquillity once it is submitted at Deadline 5.	
WC-016	Issue Specific Hearing (ISH2): Landscape and Visual	The Cotswolds National Landscape	Duty to Further the Purposes of the CNL	The Applicant has not simply sought to mitigate the effect of the Scheme on the National Landscape. The avoidance measures embedded within the Scheme

Reference	Theme	Issue	Comments	Applicant's Response
	Impact		2.27. Wiltshire Council considers that the duty is on the decision maker to undertake a much more overarching assessment than simply considering if the Applicant has sought to mitigate the impact of the development on the National Landscape. 2.28. There are two key cases which the council would wish to highlight. The first is the Wadhurst Parish Council v Secretary of State for Housing Communities and Local Government [2025] EWHC 1735 (Admin), which related to the grant of planning permission (on appeal) for camping-related development in the High Weald National Landscape. It is clear from this judgement that conserving the natural beauty means doing no harm. 2.29. With respect to the Lime Down Solar Park proposed development, Wiltshire Council's position is that there is going to be harm to the CNL, and therefore Section 85 of the CROW Act will be a material consideration. The issue is considered to be whether the Secretary	have been retained within the Order limits to provide positive enhancements within the setting of the CNL. With reference to the CNL Board's Submissions Received at Deadline 3 [REP3-154] the CNL Board have confirmed that: "we consider that the Applicant has sought to further its natural beauty through the proposed enhancement measures located in the setting of the CNL, including some of those outlined at Table 19 of ES Appendix 8-6 such as 60 hectares of wildflower meadow and 63 hectares of set aside for ground nesting birds. These would comprise enhancements to the CNL's setting above and beyond the current baseline condition on land which is visually connected to, and has a complementary landscape character to, the adjacent CNL". As clarified by the CNL Board in [REP3-154] which states: "DEFRA guidance referenced in our Relevant Representations (RR-0944) states that in

Reference	Theme	Issue	Comments	Applicant's Response
			of Sate in granting consent could still comply with the duty to seek to further the purpose of conserving and enhancing of natural beauty in the National Landscape.	discharging this statutory duty outlined at Section 85 of the Countryside and Rights of Way Act 2000 (as amended), relevant authorities should seek to avoid harm and contribute to the conservation and enhancement of the natural beauty, special qualities, and key characteristics of Protected Landscapes as far as is reasonably practical." Section 245 of the Levelling-up and Regeneration Act 2023 amended the duty under section 85 of the Countryside and Rights of Way Act 2000 (CRoW Act) for relevant authorities when undertaking any function in relation to, or so as to affect, land in Areas of Outstanding Natural Beauty which are now known as 'National Landscapes'. Section 85 (A1) of the CRoW Act 2000 (as amended by the LURA 2023) states: "In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty in England, a relevant authority other than a

Reference	Theme	Issue	Comments	Applicant's Response
				devolved Welsh authority must seek to further the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty." Relevant authorities have a general duty to 'seek to further' the purpose of conserving and enhancing the natural beauty of National Landscapes. This replaces the previous duty on relevant authorities to 'have regard to' their statutory purposes. The Secretary of State in making his decision on the DCO application is subject to this duty as a "relevant authority". To date, no draft regulations have been published to provide further details as to how a relevant authority is to comply with the duty. However, the Applicant notes that guidance was published by Defra on the 16 December 2024 titled 'Guidance for relevant authorities on seeking to further the purposes of Protected Landscapes',

Reference	Theme	Issue	Comments	Applicant's Response
				which has informed development of the Scheme and the DCO application. The Defra Guidance is clear that the CNL duty applies to decision making in respect of nationally significant infrastructure projects. Critically, the guidance says: “Consideration of what is reasonable and proportionate in the context of fulfilling the duty is decided by the relevant authority and should take account of the context of the specific function being exercised.” (emphasis added). The duty does not over-ride other statutory duties and this is noted in the Defra Guidance: “The duty does not prevent relevant authorities from undertaking their statutory functions and discharging their legal duties and other responsibilities. The duty is intended to complement these requirements by ensuring that the purposes for which Protected Landscapes are designated for are recognised in

Reference	Theme	Issue	Comments	Applicant's Response
				reaching decisions and undertaking activities that impact these areas.” The Defra Guidance confirms that the duty applies to functions undertaken outside of the designation boundary including the setting of a National Landscape. This is consistent with paragraph 5.10.8 of NPS EN-1 which states: “The duty to seek to further the purposes of nationally designated landscapes also applies when considering applications for projects outside the boundaries of these areas which may have impacts within them. In these locations, projects should be designed sensitively given the various siting, operational, and other relevant constraints. The Secretary of State should be satisfied that measures which seek to further the purposes of the designation are sufficient, appropriate and proportionate to the type and scale of the development.”

Reference	Theme	Issue	Comments	Applicant's Response
				This is not a “no effects” duty and must be considered within the context of a large scale, Nationally Significant Infrastructure project that will have some unavoidable residual effects. That position was recently confirmed by the SoS in the <u>North Falls Offshore Wind Farm</u> (paragraph 4.124 where the SoS says he agrees the duty does not need to be achieved but must be sought to further, and para 4.126 where he says the duty does not require all adverse effects to be offset by enhancement measures). Nor does it require that all residual effects must be completely offset by enhancement measures (para 4.127 of North Falls SoS decision). The Secretary of State must exercise judgment as to whether the measures proposed as part of the Scheme to avoid and reduce impacts on the statutory purposes of the CNL are appropriate, reasonable and proportionate, and whether it would be appropriate, reasonable and proportionate to require

Reference	Theme	Issue	Comments	Applicant's Response
				any further measures to further the purpose of the CNL.
WC-017	Issue Specific Hearing (ISH2): Landscape and Visual Impact	The Cotswolds National Landscape	2.30. The other case which the council wishes to highlight is the New Forest National Park Authority v Secretary of State for Housing, Communities and Local Government [2025] EWHC 726 (Admin), which provided the first major legal interpretation of the strengthened statutory duty on public bodies to "seek to further" the purposes of protected landscapes. The key paragraphs from the Judgment are paragraphs 61 to 63 which state:	Please refer to the Applicant's responses above noting that Section 85 of the Countryside and Rights of Way Act 2000 has been amended.

Reference	Theme	Issue	Comments	Applicant's Response
			61. As a matter of ordinary English, to "further" a stated purpose is to promote or to facilitate that purpose. Therefore, the duty imposed by section 11A(1A) of the 1949 Act upon a planning authority determining a planning application requires more than merely weighing the effect of the proposed development on the section 5(1) purposes in the overall balance. In order to discharge the strengthened duty, the planning authority must determine whether the proposed development is consistent with the promotion of the statutory purposes. If the planning authority determines that the proposed development is in conflict with the statutory purposes or would undermine the fulfilment of the section 5(1) purposes, they must consider whether the grant of planning permission would be in accordance with their duty to seek to further those purposes. 62. The strengthened duty is expressed in qualified terms. The planning authority is required "to seek to further" the section 5(1) purposes. It is not under a duty necessarily to fulfil those purposes. Nevertheless, in my view, in any case in which the planning authority determines that a planning application proposes development which is in conflict with the section 5(1) purposes or will undermine their fulfilment, the authority ought both to consider whether and to explain why they have decided that planning permission may justifiably be granted. The planning authority's consideration of those matters will necessarily be informed by the circumstances of the given case, including the size and scale of the development under consideration and the extent and severity of its conflict with the section 5(1) purposes. These are matters of judgment, but a duty "to seek to further" the section 5(1) purposes necessarily invests the planning decision maker with the responsibility to judge, firstly, whether the planning application before them for decision proposes development which interferes with the fulfilment of those purposes; and if it does, whether and if so why the grant of planning permission is justified. 63. The planning authority may need to consider whether and if so, how the proposed development may be mitigated in order to address the identified conflict with the statutory purposes. They may need to consider whether any compensatory measures are available which might offset the identified conflict with the statutory purposes. They will need to consider the imposition of conditions or the need to obtain planning obligations to secure such measures. 2.31. This essentially invites the Secretary of State, in a situation where we are here, where the development would in itself conflict with the national landscape purposes, to consider whether and explain why permission could be granted. Permission can justifiably still be granted, but a much broader assessment would be required than simply looking at the	

Reference	Theme	Issue	Comments	Applicant's Response
			nature of the harm. The extent of the interference with the purposes would need to be considered, and after having assessed this, consider whether the grant of development consent could still be justified. 2.32. Whilst the council has not undertaken its own assessment under section 85 of the CROW Act, its position is that consent should not be granted.	
WC-018	Issue Specific Hearing (ISH2): Landscape and Visual Impact	Landscape Character	4.1 Landscape character receptors 2.33. Wiltshire Council welcomed the Applicant undertaking an assessment of the Limestone Lowland landscape type and its sub-divided Landscape Character Areas.	The Applicant notes this comment. The Limestone Lowlands Character Assessment [EN010168/EXAM/9.60] is submitted at Deadline 5.
WC-019	Issue Specific Hearing (ISH2): Landscape and Visual	Landscape Character	2.34. With respect to the setting of Norton Village, the council's Written Representation [REP1-138] considered the settlement of Norton. It stated:	At the request of the Examining Authority (ExA) following Issue Specific Hearing 2 (ISH2) Wiltshire Council (WC) submitted Wiltshire Council Post Hearing Summaries and Responses to

Reference	Theme	Issue	Comments	Applicant's Response
	Impact		5.8. Norton is a small village and civil parish located just outside the CNL and approximately 1km to the south-east of the Fosse Way. It is located almost centrally within the DCO application area on gently undulating farmland with hedges and trees / woodland forming an important component of, for the most part, an intimate landscape. The village is served by minor roads and is also accessed by several rural footpaths. Rural countryside views are in evidence in all directions from the village, often filtered by trees. No industrial or major development is visible or perceived from the village or its environs. 5.9. The proposed development would involve the construction of two major areas of solar panels and infrastructure to both the north and south of the village, Lime Down Solar Park Sites B and D respectively as well as a particularly large swathe of the cable route corridor located to the southwest of the village which includes a major construction compound.	Action Points Arising [REP4-092]. This document contained WCs Post ISH2 summaries as well as their response to any ISH2 Action Points. Under Item 4: Landscape Character WC raised concerns re the setting of Norton Village and have submitted Appendix C ISH2: Action Point 16 Plans Illustrating Potential Panel Reduction to Reduce Impact of Norton Village Setting to illustrate areas of Potential Solar Panel Reduction. The Applicant has reviewed these comments and associated drawings and remains confident that the existing layout maintains separation from the village, maintains the setting of the settlement, applies mitigation to reduce adverse visual effects and that ES Volume 1 Chapter 8 Landscape and Visual [REP3-025] has robustly identified potential effects to the character of the landscape and visual amenity of receptors in and surrounding the settlement.

Reference	Theme	Issue	Comments	Applicant's Response
			The distance of the development areas from Norton means that solar development will effectively dominate the village to the north, south and west, with a substantial area to the south, in Site D, on slightly rising ground being devoted to the energy storage Battery Energy Storage System (BESS) and possibly a substation site area. These are very large industrial developments in their own right, which the council considers have not been adequately assessed against the receiving landscape character and the visual amenity of the area, in particular the landscape setting of Norton and potential intervisibility. 5.10. Key issues which have not been adequately addressed: • The construction of large areas of solar panel development immediately to the north and south of the village (Lime Down Solar Park Sites B and D) leading to their dominance in the rural setting.	The village of Norton is nestled in a valley where a small stream is forded giving it a nucleated character with typical limestone cottages at its centre and larger farms and farmhouses on its periphery. The village has an enclosed character due to the topography and surrounding woodland, hedgerows and trees becoming more open as the landform rises beyond the village. The settlement contains a number of Listed Buildings, including the Grade II* Norton Manor and the Grade II All Saints Church. The village is not designated as a Conservation Area. There is no intervisibility from either the Church or Norton Manor to the Scheme. The visual effects of the Scheme on the village of Norton (Receptor RS008)) has been assessed in ES Volume 1, Chapter 8: Landscape and Visual [REP03-025]. These receptors are assessed in Appendix 8-3-1: Visual Assessment Sheets (Not carried through to the ES Assessment) [APP189]. As no significant

Reference	Theme	Issue	Comments	Applicant's Response
			• The dominance of solar panels associated with Site B across the fields to the east of the access road leading to the village from the north, Eastern Grey approach. • The proposed construction route across fields to the northwest of the village running parallel to the Fosse Way (Byway section) in combination with the wide swathe of cable route corridor to the west of the village impact approaches and setting of the village from the north and west. • Several hectares of land in Lime Down Solar Park Site D have been earmarked for energy storage and potentially substation facilities, which are major industrial features of the scheme and potentially have the greatest landscape and visual impacts being located on gently rising, slightly higher ground. • Requirement to grow the existing relatively low field boundary	effects were recorded due to the distance to infrastructure from the receptors and the fact that the village is nestled within a valley, Norton was not carried through to the further ES Assessment) The LVIA , ES Volume 1 Chapter 8 Landscape and Visual [REP3-025] recognises that there would be Moderate Adverse (Significant) effects on the character of the Landscape surrounding Norton (within the 1km Study Area) during construction as a result of the Scheme and the change from agricultural land to a solar infrastructure. Due to the location of the village within a valley and the rising topography in all directions, its immediate setting is constrained. Existing vegetation on the edge of the village provides further containment. The wider setting of the village is only perceived on the minor roads leading to and from the village on higher ground. Given the contained nature

Reference	Theme	Issue	Comments	Applicant's Response
			hedges to at least 4.5m to screen the solar panels removing open views. • Every Public Right of Way (PRoW) and every public road approaching and exiting the village of Norton will be impacted to varying degrees by the development at all stages of the project. • There are no indicative details of where the vast quantities of topsoil and subsoil arising from the construction of the project and being relied upon for restoration will be stored or distributed. This could be on areas reserved for landscape / ecological mitigation and embedded mitigation or close to high value sensitive features or receptors. 5.11. As a result, Wiltshire Council recommends: • The sites proposed for the solar development immediately to the north and south of the village should be reconsidered in light of the potential dominance of solar panels in the village's	of the settlement within the wooded folds of the valley, the adverse effects of the Scheme within the surrounding landscape would have no direct effects on the character of visual amenity of the village itself. Additionally, due to the location of the village within a valley and the rising topography in all directions there is very limited visibility of the Scheme, with it only being from the local roads (and footpaths) where there would be any notable appreciation of the arrays. As such, once receptors are on higher ground away from the core of the settlement, and out of the immediate setting of the village and on any of the minor roads leading to and from the village the visual assessment acknowledges that there are some Significant adverse effects to visual amenity. Refer to Assessments for Receptors TR057, TR060, TR061 and TR202 which are summarised in ES Volume 3, Appendix 8-3-3 Summary of Visual Effects [APP-192].

Reference	Theme	Issue	Comments	Applicant's Response
			landscape setting. Areas close to both the north and south of the village should be pulled back from the settlement edge to reduce their visual dominance and the landscaped boundaries increased to mitigate and reduce potential views. • To the north of the village, the solar panels in Lime Down Solar Park Site B will dominate the village entrance, where currently there are some of the most open views in the receiving landscape. The proximity of the panels close to the road and their orientation will result in significant, inadequately mitigated views, to an extent which will be dependent on their construction. Moving the panels away from the road and considerably increasing the landscape buffer will help to reduce the impact, although it will have to be accepted that currently available long views across the landscape will substantially change. • The effects of the BESS and substation on the landscape setting and visual	The layout of the arrays has been designed to give separation from the roads and footpaths and to allow room for additional mitigation planting. On the approach north from Hullavington, when traveling along Norton Road (TR061) the Order Limits stop some 0.7km south of Norton allowing a suitable buffer between the development and the approach into the village. On the road west of Norton to Sherston (TR057) there are no panels proposed within 400m (to the south) of the road with the land in between comprising blocks of woodland and agricultural fields separated by hedgerow. Road Users heading east along Honey Lane (TR202) would need to travel some 300m further beyond The Vine Tree before coming alongside the array and road users heading north along Honey Lane (TR060) a similar distance (275m). Again, the array is located beyond woodland, field hedgerows and roadside hedgerows that all reinforce the

Reference	Theme	Issue	Comments	Applicant's Response
			amenity of Norton, and the lanes linking through to Hullavington (south) and Eastern Grey (north), need to be assessed and suitable landscape mitigation and enhancement measures introduced to protect rural identity and setting to the village. • At any site access points retained for future maintenance access of solar panel, BESS or substation areas, the planting of a secondary hedge inside the access, although not ideal from a character point of view, would restrict receptor views of the development when passing by the access points. 2.35. The above actions would enable the rural setting and character of the village to be maintained and would mitigate the character and visual effects associated with this development proposal. It would also remove the need for high, out of character, hedgerows, as the development would be pulled back from	separation between the proposed infrastructure and the settlement. Given the above, very Low levels of visual change were recorded for the village of Norton. This is due to the distances from infrastructure and the visual containment provided by the character of the receiving landscape. Although there will be no direct effects on the village of Norton as a result of the Lime Down Scheme, there will be perceivable changes in landscape character of the surrounding landscape as agricultural fields within the Scheme change from agricultural land to solar infrastructure which will be experienced to varying degrees when using local roads and footpaths to and from the village.

Reference	Theme	Issue	Comments	Applicant's Response
			the edge of the fields, so that open views across the landscape could be maintained. 2.36. The council expressed its view that it was less concerned with the route to the north-east as the field is slightly raised, therefore the hedgerows are slightly higher and doesn't offer the same aspect of openness in views. 2.37. To better illustrate exactly what the council was seeking in terms of panel reduction, a plan has been produced in response to Action Point 16 and this is contained within Appendix C to this response.	
WC-020	Issue Specific Hearing (ISH2): Landscape and Visual Impact	Landscape Character	4.2 The legacy landscape 2.38. Wiltshire Council suggested the planting of a second hedgerow at gate entrances to reduce the visibility of solar PV panels within its Written Representation [REP1-138].	The Applicant does not agree that additional mitigation in the form of secondary hedgerow planting at site access points is necessary or justified. The effects associated with the proposed access points have been assessed within ES Volume 1 Chapter 8 Landscape and Visual [REP3-025] on a

Reference	Theme	Issue	Comments	Applicant's Response
			2.39. The council does not consider that the full effects of the vehicle access points have been fully detailed yet, as the detailed design is yet to be undertaken. Due to the highway visibility splays and the potential requirement to keep hedgerows low, depending on the alignment, it is considered that the visual effects will be experienced by road users in both directions, particularly on some of the longer, straighter roads, which would result in views directly in the solar PV fields. 2.40. Whilst the council accepts that a secondary hedgerow would not be characteristic of the area, on balance the council's Landscape Officer considered that it would be worthwhile to screen the entrance / exits in order to retain the character of the road, and reduce the overall impact. It was noted that these measures had previously been employed successfully on a quarry access point.	reasonable worst-case Rochdale Envelope basis, taking account of the maximum extent of potential hedgerow removal required to facilitate access. The conclusions of that assessment, including the effects associated with the access points, are set out within the LVIA. The mitigation is set out in Table 8-12 of the LVIA [REP3-025]. This includes the retention of existing woodland, scrub and hedgerow cover (other than where removal is required to facilitate access), recognising that this vegetation provides a strong visual framework and has the potential to screen or substantially filter ground-level views towards the Scheme. Existing hedgerows will be allowed to grow out and will be managed to a height of 4.5 m, with hedgerow trees encouraged to develop further in order to strengthen field boundaries and reinforce the existing landscape structure. The mitigation strategy also recognises that a different approach is appropriate

Reference	Theme	Issue	Comments	Applicant's Response
			2.41. It was stated that whilst the scheme was "temporary", given the scheme's 60-year life, the council would not class it as a temporary effect. At the end of the scheme's life, these short sections of hedgerows could be removed, or even if they were retained, whilst it would be a slight anomaly to character, the council's Landscape Officer did not consider that it would be particularly harmful when considered overall.	where the Scheme adjoins the Cotswolds National Landscape. Accordingly, all hedgerows bordering the Cotswolds National Landscape within Site C (including hedgerow SH3) are to be maintained at approximately 1.5 m in height (or retained at their existing height where already greater) in order to maintain open views across the landscape within the setting of the National Landscape. This demonstrates that the mitigation strategy has been carefully tailored to the differing landscape objectives across the Site. In addition, the Outline LEMP [REP3-100] includes new hedgerow planting where appropriate and, where aligned with existing landscape features, this includes planting in the vicinity of certain access points to reinforce the established landscape pattern. Having regard to the conclusions of the LVIA and the mitigation already secured through the certified application

Reference	Theme	Issue	Comments	Applicant's Response
				documents, the Applicant does not consider that there is a justification for requiring secondary hedgerow planting at access points. Furthermore, as acknowledged by Wiltshire Council, the introduction of secondary hedgerows would not be characteristic of the local landscape. The Applicant therefore considers that the existing mitigation strategy strikes an appropriate balance between mitigating visual effects and conserving the established landscape character, and that no further mitigation is necessary.
WC-021	Issue Specific Hearing (ISH2): Landscape and Visual Impact	Landscape Character	4.3 Cumulative landscape character effects 2.42. Wiltshire Council invited the Applicant to consider paragraph 7.28 of GLVIA3 when carrying out the cumulative landscape effect assessment. This is because there is a point when looking at changes to key characteristics, that a particular development may tip the	ES Volume 1 Chapter 8 Landscape and Visual [REP3-025] acknowledges that there would be there would be an immediate change to the character of the Sites themselves and their immediate surroundings as they change from an area of arable farmland to solar infrastructure with the LVIA recording Significant Adverse effects on the character of the Landscape (including within the Lime Down Sites) through to the establishment

Reference	Theme	Issue	Comments	Applicant's Response
			balance so that the key characteristics are changed. 2.43. Therefore, an assessment of the baseline and upcoming new development must be taken into account. The council concurred with the SLD representation on which types of development should be included within this assessment.	of the Mitigation planting as a result of the Scheme and the change from agricultural land to a solar infrastructure. However, with the establishment of the landscape mitigation the introduction of the solar arrays and other associated infrastructure would not become a defining feature on the landscape once operational. The Lime Down Scheme would only occupy a small component of the Hullavington Rolling Lowland. 2.43 The Long List has been developed by AECOM with information derived from Wiltshire Council Planning Portal. From this, AECOM defined the Short List which has been heavily consulted on with representatives from Wiltshire Council. The Applicant considers that the scale at which cumulative landscape character effects should be assessed depends on a number of factors which are specific to a particular project and location. Fundamentally it relates to the scale of the project and the nature of the receiving

Reference	Theme	Issue	Comments	Applicant's Response
				landscape and its capacity to accommodate change which relates to its aesthetic and perceptual qualities. The LVIA Cumulative Assessment set out in , ES Volume 1 Chapter 8 Landscape and Visual [REP3-025] has been undertaken with consideration of the appropriate and relevant guidance and robustly assesses both the Cumulative landscape and visual effects of the Scheme. The LVIA Cumulative Assessment follows the principles of the Landscape Institute's Guidelines for Landscape and Visual Impact Assessment Third Edition (GLVIA3). The assessment of cumulative effects is required both by the EIA and the Strategic Environmental Assessment (SEA) Directives and by the associated Regulations. The Methodology of the LVIA Cumulative Assessment set out in ES Volume 3, LVIA Methodology [REP1A-006] was included within the initial Scoping Application and

Reference	Theme	Issue	Comments	Applicant's Response
				through consultation with Officers has been updated with feedback from Wiltshire Council (WC) prior to the DCO Application. The LVIA Methodology (which includes the Cumulative Assessment) has been agreed with both WC and the CNLB as set out within their corresponding Statements of Common Ground: 8.2 Statement of Common Ground with Wiltshire Council [REP2-025] and 8.7 Statement of Common Ground with Cotswolds National Landscape Board [REP2-029]. GLVIA3 (Para 7.5) states that the key for all cumulative impact assessments is to focus on the likely significant effects and in particular those likely to influence decision making: "It is always important to remember that the emphasis in EIA is on likely significant effects rather than on comprehensive

Reference	Theme	Issue	Comments	Applicant's Response
				cataloguing of every conceivable effect that might occur" And that: "The emphasis must always be on the main project being assessed and how or whether it adds to or combines with the others being considered to create a significant cumulative effect" GLVIA3 Para 7.13 sets out that the Baseline for the Cumulative Assessment (Cumulative Baseline) should include: "The baseline for assessing cumulative landscape and visual effects should then include those schemes considered in the LVIA and in addition potential schemes that are not yet present in the landscape but are at various stages in the development and consenting process: • Schemes with planning consent;

Reference	Theme	Issue	Comments	Applicant's Response
				• Schemes that are the subject of a valid planning application that has not yet been determined.” GLVIA3 states at Para 7.14 that: “Schemes that are at the pre-planning or scoping stage are not generally considered in the assessment of cumulative effects because firm information on which to base the assessment is not available and because of uncertainty about what will actually occur, that is, it is not ‘reasonably foreseeable’.” However, GLVIA3 goes onto state that: “But there may be occasions where such schemes may be included in the assessment if the competent authority or consultation bodies consider this to be necessary. Such a request should only be made if absolutely necessary to make a realistic assessment of potential cumulative effects. It should be noted that in England and Wales guidance from the

Reference	Theme	Issue	Comments	Applicant's Response
				Planning Inspectorate explicitly indicates that nationally significant infrastructure applications should consider this aspect in scoping their cumulative effects (Planning Inspectorate, 2012)." This approach was requested by WCC and there are 7 schemes that were included upon the 'Short List' that are at the Scoping or Screening Stage. The focus of the LVIA Cumulative Assessment is on the combined effect of the Lime Down Scheme in conjunction with those other identified developments which have yet to receive planning approval and are still within the planning process – this being those schemes included on 'The Short List'. GLVIA3 Para 7.10 states that: "...the focus of the cumulative assessment will be on the additional effect of the project in conjunction with other developments of the same type (as, for

Reference	Theme	Issue	Comments	Applicant's Response
				example, in the case of wind farms; see SNH, 2012)" Given GLVIA3 Para 7.10 the Short List is then further refined to identify those proposed developments which are of a similar nature, eg Renewable Infrastructure. It is then these developments which are carried forward into the LVIA Cumulative Assessment. Other developments on the Short List that do not fall into the category of Renewable Infrastructure are considered for their potential inclusion as additional visual receptors. For example, a large-scale urban extension, where future residents may have views of the Development, and as such are included within the Visual Assessment component of the LVIA Cumulative Assessment. Of the schemes from the 'Short List' a total of 14 schemes have been identified as being of the same type of infrastructure as The Lime Down Solar Project and have been included within the LVIA Cumulative

Reference	Theme	Issue	Comments	Applicant's Response
				Assessment. The schemes are also set out in ES Volume 2, Figure 8-15-1 to 8-15-7 Cumulative Sites [APP-106] .
WC-022	Issue Specific Hearing (ISH2): Landscape and Visual Impact	Landscape Character	2.44. In terms of Wiltshire Council's position on the existing list of cumulative development, the council will be responding to the ExA question on this as part of its response at Deadline 4.	With reference to Wiltshire's Deadline 4 response to the ExA's first Questions at CE1.2 [REP4-090] "one additional development proposal which is not included within the long list due to the recency of submission: Planning Application: PL/2026/03545". This is an application for up to 400 dwellings, land for a Local Centre, accommodating commercial, business and service uses, drinking establishment and hot food takeaway); and local community uses; and associated landscaping. As this is not a renewable Scheme it would not be included in the LVIA shortlist. See response to 2.43 above.
WC-023	Issue Specific Hearing (ISH2):	Landscape Character	2.45. However, the council has consistently highlighted its concerns regarding the approach to	There is a total of 19 renewable schemes within the 10km Cumulative Study Area as shown on ES Volume 2, Figure 21-1

Reference	Theme	Issue	Comments	Applicant's Response
	Landscape and Visual Impact		cumulative landscape assessment in the limestone lowland type. The council has deep concerns regarding the clustering of solar developments within this specific landscape type. It is imperative that we understand whether or not the limestone lowland type or its limestone lowland character areas being 16 incrementally turned into a solar landscape. This should include considerations of character and fabric as well as visual.	Location of Short List Cumulative Developments [APP-178]. The Cumulative Assessment of the 10 km Cumulative Study Area is found in Section 4.8 of 6.3 Environmental Statement Volume 3 Appendix 8-3-2-2 Landscape and Visual Assessment Sheets Significant (Rev 2) [REP3-044]. The overall Sensitivity of the 10km Study Area has been assessed as High to Medium which reflects the gradual change in landscape value from west to east. The Cotswold National Landscape which occupies most of the western part of the 10km Study Area is of High National Value as a consequence of its designation. Due to its High value and High susceptibility to change, there are no renewable schemes within the Cotswold National Landscape (within the 10km Study Area). This means that the 19 renewable schemes within the 10km Cumulative Study Area are to the eastern side of the Study Area.

Reference	Theme	Issue	Comments	Applicant's Response
				From within the 10km Cumulative Study Area, the Scheme and the Cumulative Development Sites identified within this Study Area would be well screened and readily absorbed into the rolling landscape with little to no appreciation from within the surrounding arable countryside. The conclusions of the LVIA are that despite the intensification of solar schemes across the area, the receiving landscape has the ability to accommodate the Scheme and the CD Sites without resulting in any overall increase in the Significance of Effects. The Applicant has submitted the Limestone Lowlands Character Assessment [EN010168/EXAM/9.60] at Deadline 5 and which will consider the effects of the Lime Down Scheme on the key characteristics; inherent landscape sensitivities; and broad management objectives for the Landscape Character Areas scoped into the assessment as defined in the Wiltshire County

Reference	Theme	Issue	Comments	Applicant's Response
				Assessment and the Local North Wiltshire Assessments. It will also consider the cumulative effects on the Landscape Character Areas and the overarching Limestone Lowland Landscape Type LCT 16.
WC-024	Issue Specific Hearing (ISH2): Landscape and Visual Impact	Visual Impact	5.1 Visual impact in the construction phase 2.46. With respect to soil storage, the council expressed concern that there is no indication of where soil will be stored and it is not clear why this information is not currently available. The council considers that footprints and maximum heights should be provided, because these could be very substantial structures. 2.47. It was noted that the Outline Soil Resource Management Plan identified the height for soil storage at a maximum of 3m high. In the council's calculations, as contained within its Written	The Outline Soil Resources Management Plan (SRMP) [REP4-054] states the maximum parameters of soil stockpiles, including heights (3m for topsoil and 4.5m for subsoil) and side slopes (1 in 2, or 25°). The most efficient stockpile footprint considered by Wiltshire Council is a large square. The Applicant considers it is very unlikely that all excavated soils will be stored in one square stockpile, rather the specific locations and dimensions of individual soil stockpiles will be determined in collaboration with several disciplines at the detailed design stage. The maximum parameters are maximums, not aims, and there is therefore a large degree of flexibility in stockpile location

Reference	Theme	Issue	Comments	Applicant's Response
			Representation [REP1-138] and Deadline 3 [REP3-141] submissions, the council calculated the most efficient footprint area, which could accommodate the estimated soil storage volume for just the BESS access track located in Lime Down D. However, the council queries which element(s) of the proposed development are going to make way for these large footprints for topsoil storage – would it be the solar PV panel areas, the ecological mitigation or land which has been set aside etc.? 2.48. The council is seeking evidence from the Applicant in terms of feasibility of whether the soil can be stored and utilised for restoration or whether it will need to be disposed of and replaced. The relationship to SuDS drainage features was also noted.	and design. For example, a potential option would be for soils excavated from the BESS access track to be stored alongside in a long but low stockpile which would also partially screen the track. No soil will be exported from the site or disposed of. All excavated soils will be retained on-site and will either be stockpiled during construction and be available for re-use in restoration at decommissioning, or alternative uses may be identified at construction, such as soil spreading in mitigation areas to support low-nutrient habitat creation. For the purposes of the ES Volume 1 Chapter 8 Landscape and Visual [REP3-025], the construction phase effects are effects that result from activities during site preparation / enabling works, construction, and commissioning activities, for example, effects such as construction traffic, noise and vibration from construction activities, dust

Reference	Theme	Issue	Comments	Applicant's Response
				generation, site runoff, mud on roads, and the visual intrusion of plant and machinery on Site. ES Volume 1 Chapter 8 Landscape and Visual [REP3-025] has undertaken a realistic 'worse case' assessment based on the principles of the Rochdale Envelope and has therefore considered a construction programme for the entire Scheme to be approximately 24 months with the potential likelihood of overlapping construction works on the different Sites as set out within ES Volume 1, Chapter 3 The Scheme [APP-055]. The LVIA has used the principles set out within 7.4 Design Principles and Parameters [REP4-043], to inform the LVIA considerations associated with the Construction phase requirements.

WC-025	Issue Specific Hearing (ISH2): Landscape and Visual Impact	Visual Impact	5.2 Sequential visual effects 2.49. Wiltshire Council confirmed that it had suggested the routes as mentioned by the ExA for a sequential visual effects assessment. 2.50. It is the council's position that the Technical Note on Cumulative Sequential Visual Effects [REP1-123] and Table 8-23 of ES Chapter 8 [APP-060] places undue emphasis on Major Roads, while overlooking the well-used minor routes that define the character of the Lime Down project area and from the intraproject sequential effects are likely to be most noticeable. 2.51. Table 7.1 of GLVIA3 states that: "Sequential effects may be assessed for travel along regularly used routes...". Given the receiving landscape contains very few roads which would be classified as more than minor, the council considers that it is obvious that these routes are those which are going to be used for travel within the area and therefore the	The Applicant notes that the Technical Note on Cumulative Sequential Visual Effects [REP1-123] which assessed the effects on the Fosse Way and the A429 and the A350 routes was undertaken at the request of Wiltshire Council, as set out in paragraphs 8.25 and 8.26 [RR-4934]. A Sequential Assessment has been undertaken within the LVIA which is in accordance with GLVIA3 Table 7.1 that sets out that sequential effects may be assessed for travel along regularly used routes such as major roads or popular paths. Given GLVIA3's referral to major roads, it is important to note that the Department for Transport classifies Major Roads to include motorways and all class 'A' roads. These roads usually have high traffic flows and are often the main arteries to major destinations. Minor roads comprise 'B' and 'C' classified roads in addition to unclassified roads. Major roads locally to the Scheme include the M4 and A42 associated with the PV Sites A-E, and the A420, and A4 (Bath Road) associated with

			sequential effects of travelling along them must be assessed. 2.52. These minor routes form important links used by many people every day, whilst they will be passing through the various parts of the development in sequence. Users may include people in cars, people cycling, riding horses and walking etc. However, these routes are not necessarily footpaths or bridleways, they are minor roads which link the development areas. 17 2.53. The council considers that these key routes should be defined so that the potential sequential visual effects can be assessed, as users will see the same site or the same area from a different viewpoint as you move around the DCO area. 2.54. To better illustrate the routes which the council considered should be include within the assessment, a plan has been produced in response to Action Point 19 and this is contained within Appendix D to this response.	the Cable Route Corridor. All other roads locally are classified as Minor. GLVIA3 also suggests that popular paths should also be included within Sequential assessments. Popular paths are those typically considered those to be promoted or recognised in some way such as National Trails, Recreational Routes, long distance trails or locally promoted walks. The Applicant notes the following proposed routes in Appendix D of [REP4-092]: Route 1 between Easton Town, Sherston to the Fosse Way through Lime Down A: Route 1A continuing straight from Route 1 past Fosse Farm, zig zagging to the locally known Happylands railway bridge towards Hullavington (through the existing Hullavington Windmill Hill solar farm); Route 1B turning south from Route 1 to follow the Fosse Way and the road to Grittleton. Route 2 from Easton Grey, crossing Foxley Road to join the Fosse Way

				alongside Field B6, following the right angled bend in the road towards Norton (past Field B7, B8 and B9) and then exiting the village towards Hullavington through Site D. The effects of the Scheme on the majority of Receptors which make up these routes has been robustly assessed in the LVIA. Whilst noting these are rural roads, they are the only roads providing local access between villages. The speed of the traffic on these routes is predominantly 60mph with speed limits only limited to 30mph within built up areas. The roads are also narrow country lanes which have no footpaths. Noting that users of these roads are predominantly car users, (which are not within the CNL) the Sensitivity of users would be Medium. This corresponds with paragraph 6.33 GLVIA, "travellers on road, rail or other transport routes tend to fall into an intermediate category of moderate susceptibility to change. Where travel involves recognised scenic routes

				awareness of views is likely to be particularly high". Whilst acknowledging that the Applicant has undertaken sequential visual assessments for major routes and recognised routes, the Applicant will undertake the additional requested sequential assessments on the proposed routes for Deadline 6.

Reference	Theme	Issue	Comments	Applicant's Response
WC-026	Issue Specific Hearing (ISH2): Landscape and Visual Impact	Visual Impact	5.3 Residential visual amenity 2.55. The council confirmed that having reviewed the Applicant's Deadline 3 submission and following further discussions, the council concurred with Stop Lime Down that the threshold for a Residential Visual Amenity Assessment hasn't been met for the Grain Store. However, this did not diminish the significant effects that have been identified for those properties.	The Applicant notes this comment.
WC-027	Issue Specific Hearing (ISH2): Landscape and Visual Impact	Design and Parameters	2.56. The council has reviewed the included scheme 'Commitments' – Specific elements of the detailed design of the scheme components including considerations such as appearance, materials, colour and alignment included for the works number (1 to 10) in REP3-084. The council considers the following (minor additions) to already advised 'commitments' for the following 'work numbers' and 'scheme components' should be further secured and	The Applicant notes this comment.

Reference	Theme	Issue	Comments	Applicant's Response
			incorporated to provide more certainty that detailed design solutions will be sympathetic to the rural character of the area. 2.57. The council considers minor additions to two existing detailed design commitments repeated within the tables should be further incorporated. These relate to the:	
WC-028	Issue Specific Hearing (ISH2): Landscape and Visual Impact	Design and Parameters	2.58. 'Perimeter fencing commitment' and the 'highway access point commitment' as incorporated within Section 2.2-2.11, pages 5 to 26, within the following tables. Table 2-3 (Work No.3) Design Parameters and Commitments	The Applicant has provided a response to the specific points raised in rows WC-029 – WC-033 below.
WC-029	Issue Specific Hearing (ISH2): Landscape and Visual Impact	Design and Parameters	2.59. Work no. 3 - works in connection with on-site substations. Deer type wire mesh and wooden post fencing outside of the palisade fencing (Page 13). Add 'Wooden posts shall be	The Applicant has noted this comment. Table 2-5 of the Design Principles and Parameters [REP4-043] was updated at Deadline 4 to include the wording "The

Reference	Theme	Issue	Comments	Applicant's Response
			round in section and agricultural in appearance.' (or similar wording). Table 2-5 (Work No.6) Design Parameters and Commitments	wooden posts shall be round in section and agricultural in appearance".
WC-030	Issue Specific Hearing (ISH2): Landscape and Visual Impact	Design and Parameters	2.60. Work No.6 – works (a to k) various ancillary components including, fencing, landscaping etc. 18 • Perimeter Fencing Commitment (Page 20). Add 'Wooden posts shall be round in section and agricultural in appearance.' (or similar wording). • Solar PV access tracks commitment (page 21). Add 'Any edge restraints required to form or retain surface materials at access points will be laid to finish flush with adjacent road levels to avoid creation of uncharacteristic upstands' (or similar wording). Table 2-7 (Work No.8) Design Parameters and Commitments	The Applicant has noted these comments. Table 2-7 of the Design Principles and Parameters [REP4-043] was updated at Deadline 4 to state, "The wooden posts shall be round in section and agricultural in appearance". Section 6.4 of the Outline Construction Traffic Management Plan [REP4-057] was updated at Deadline 4 to state, "Any edge restraints required to form or retain surface materials at access points to the Solar PV Sites, the BESS and Substation will be laid to finish flush with adjacent road levels to avoid creation of uncharacteristic upstands".

Reference	Theme	Issue	Comments	Applicant's Response
WC-031	Issue Specific Hearing (ISH2): Landscape and Visual Impact	Design and Parameters	2.61. Work No. 8a (temporary works) 8b (permanent works) – works to facilitate access to Work Nos. 1 to 7 and 9 to 10. • BESS and Substation access commitment (page 24). Add 'Any edge restraints required to form or retain surface materials at access points will be laid to finish flush with adjacent road levels to avoid creation of uncharacteristic upstands' (or similar wording). • In relation to work no's 8a (ii) and 8b (ii) 'Creation of visibility splays' and 8a (iv) 8b (iv) 'offsite works adjacent to highways land including those to structures, boundary features, drainage features on private land, in connection with the movement of abnormal indivisible loads', the council requests the consideration and inclusion of the following additional commitments: Add "where existing sections of roadside hedgerows or dry stone walls are necessary to remove to facilitate the temporary creation of	The Applicant has noted these comments. Section 6.4 of the Outline Construction Traffic Management Plan [REP4-057] was updated at Deadline 4 to state, "Any edge restraints required to form or retain surface materials at access points to the Solar PV Sites, the BESS and Substation will be laid to finish flush with adjacent road levels to avoid creation of uncharacteristic upstands". In addition, Section 6.4 of the Outline Construction Traffic Management Plan [REP4-057] was also updated at Deadline 4 to state, "Where existing sections of roadside hedgerows or dry-stone walls are necessary to remove to facilitate the temporary creation of highway visibility splays and widened access to accommodate AIL's, the removed sections of hedgerow or drystone wall shall be replanted or reconstructed on existing alignments following completion of any temporary

Reference	Theme	Issue	Comments	Applicant's Response
			highway visibility splays and widened access to accommodate ALL's, the removed sections of hedgerow or drystone wall shall be replanted or reconstructed on existing alignments following completion of any temporary works, and on new adjusted alignments along the back edge of the required visibility splays for any permanent works' (or similar wording to achieve same outcomes). Table 2-8 Work No.9 Design Parameters and Commitments	works, and on new adjusted alignments along the back edge of the required visibility splays for any permanent works"
WC-032	Issue Specific Hearing (ISH2): Landscape and Visual Impact	Design and Parameters	2.62. Work No. 9 – works (a to f) to create and maintain habitat management areas. • Fencing Commitment (page24). Add 'Wooden posts shall be round in section and agricultural in appearance.' (or similar wording). Table 2-9 Work No.10 Design Parameters and Commitments	The Applicant has noted this comment. Table 2-8 of the Design Principles and Parameters [REP4-043] was updated at Deadline 4 to state, "The wooden posts shall be round in section and agricultural in appearance".

Reference	Theme	Issue	Comments	Applicant's Response
WC-033	Issue Specific Hearing (ISH2): Landscape and Visual Impact	Design and Parameters	2.63. Work No. 10 – creation of permissive paths • Fencing Commitment (page26). Add 'Wooden posts shall be round in section and agricultural in appearance.' (or similar wording).	The Applicant has noted this comment. Table 2-9 of the Design Principles and Parameters [REP4-043] was updated at Deadline 4 to state, "The wooden posts shall be round in section and agricultural in appearance".
WC-034	Issue Specific Hearing (ISH2): Landscape and Visual Impact	Design and Parameters	Soil Stockpiles 2.64. The council also considers that minimum / maximum design parameters for cross sectional soil stockpile / bund profiles should be added as a specific 19 design parameter. The council suggests incorporating this into Table 2-5 (Work No.6) which the council considers should include commitments for maximum height of bunds and minimum cross-sectional widths across the top and base of bund / stockpiles and minimum / maximum stockpile / bund slope angles / gradients.	Refer to the response above to comments on 5.1 Visual impact in the construction phase for commitments within the Outline SRMP [REP4-054] regarding maximum stockpile parameters.
WC-035	Issue Specific Hearing (ISH2):	Design and Parameters	The Councils Reasons and Justification	As set out above, the Applicant has included the fencing commitment requested in the Design Principles and

Reference	Theme	Issue	Comments	Applicant's Response
	Landscape and Visual Impact		2.65. The council considers its requests reasonable in order to mitigate risk from introducing uncharacteristic development components such as square section timber fence posts for fenced boundary treatments over a large, protracted area of rural countryside, and from introducing overly urban fabric components such as raised kerbs at new private access points from the public highway, impacting the character of the local rural roads and lanes. Also to ensure that the AIL works at Grittleton crossroads appropriately mitigate for potential tree loss along the edge of the adjacent woodland and /or removal of the dry-stone wall and to demonstrate soil stockpiles are practically achievable without impacting embedded mitigation or enhancement measures.	Parameters [REP4-043] which was submitted at Deadline 4. Furthermore, the Applicant has included additional commitments in the Outline Construction Traffic Management Plan [REP4-057] in relation to components such as raised kerbs in relation to rural roads. See response to paragraph 2.61. AIL works at Grittleton crossroads do not include tree loss along the edge of the adjacent woodland and /or removal of the dry-stone wall. All mitigation works to facilitate AIL movements are set out in Annex H and described in Table 13-20 of ES Volume 3, Appendix 13-1: Transport Assessment [REP4-038].
WC-036	Issue Specific Hearing (ISH2):	Design and Parameters	Design Colour Approval 2.66. The council raised the concern that if the council is being asked to approve or	As set out in the Written Summary of the Applicant's Oral Submissions and Responses at Issue Specific

Reference	Theme	Issue	Comments	Applicant's Response
	Landscape and Visual Impact		not, the colour of a battery energy container or a storage container, many on the market are only available in bright white. Presumably the council would be required to accept that at the discharge stage, if the Applicant could demonstrate that it was the only choice available. 2.67. The council queried what control mechanisms would be in place to prevent a new piece of white fabric being introduced into an elevated field area, which will be highly visible until the mitigation is established.	Hearing 2 and Responses to Action Points [REP4-085], given the nature of the Scheme, there is limited opportunity to influence the palette of colours being proposed. However, the Design Principles and Parameters [REP4-043] commits to the use of subdued, non-reflective tones, subject to manufacturers specifications, for conversion units, BESS containers, control buildings and CCTV and monitoring equipment. This approach will aid absorption of these components within the landscape, with colours to be agreed with the relevant planning authority under Requirement 5 of the Draft DCO [REP4-004]. As part of the discharge of requirement process, the Applicant would undertake informal consultation with Wiltshire Council, which provides an opportunity to provide feedback on the proposed colours of scheme components.

Reference	Theme	Issue	Comments	Applicant's Response
				It should also be noted that in relation to the BESS, there will be a 2 m bund with a 3 m acoustic barrier on top of the bund, as secured in the Design Principles and Parameters [REP4-043] which will minimise visual effects in this location.
WC-037	Issue Specific Hearing (ISH2): Landscape and Visual Impact	Design and Parameters	Community Liaison Group 2.68. The council would welcome a discussion with the Applicant on the principal areas to be covered through the Community Liaison Group.	The Applicant also welcomes further, more detailed discussions with Wiltshire Council regarding the Community Liaison Group and directs them to the Applicants response to Question HW2.1 in the Applicant's Response to the Examining Authority's Second Written Questions [EN010168/EXAM/9.54] which sets out further positions on which these discussions can be built.
WC-038	Issue Specific Hearing (ISH2): Action Point Responses	Action Point 2: Provide reference to any Nationally Significant Infrastructure Project assessments where the	3.1. The council is still undertaking its research of Nationally Significant Infrastructure Project assessments regarding landscape fabric. The council will endeavour to provide this information by Deadline 5.	The Applicant notes this comment.

Reference	Theme	Issue	Comments	Applicant's Response
		assessment of landscape fabric has included both man made and natural components in character assessment.		
WC-039	Issue Specific Hearing (ISH2): Action Point Responses	Action Point 6: Confirm whether any alterations are sought to the wording of the outline Decommissioning Strategy or draft Development Consent Order (dDCO) to secure long term landscape benefit.	3.2. Following review of the Outline Decommissioning Strategy (Rev 3) [REP3-097] and draft Development Consent Order (Rev 3) [REP3-006], the council considers that the following alterations are required.	The Applicant notes this comment and provides responses to specific matters in rows below.
WC-040	Issue Specific Hearing (ISH2):	Action Point 6: Confirm whether	Outline Decommissioning Strategy	The Applicant accepts that the word- 'successful' can be removed from the text

Reference	Theme	Issue	Comments	Applicant's Response
	Action Point Responses	any alterations are sought to the wording of the outline Decommissioning Strategy or draft Development Consent Order (dDCO) to secure long term landscape benefit.	3.3. The council notes the addition of text within Table 2: Landscape and Visual and Table 3: Ecology and Biodiversity which states: "Following successful removal of panels and associated infrastructure, all hedgerows within the Order Limits will be assessed to consider best ecological and land management practices applicable at the time of decommissioning. Consideration should be given to hedgerow heights, widths, overall plant health, species diversity, landscape character, visual amenity, as well as use by protected wildlife species." 3.4. The council considers that the word 'successful' serves no purpose and should be removed. 3.5. Furthermore, the council requests that 'views and visual amenity' be incorporated into this text, and that the 'Cotswold National Landscape designation and its setting' is also referenced as a relevant consideration at decommissioning.	and that wording that recognises the 'views and visual amenity' and the Cotswold National Landscape designation and its setting as relevant considerations as part of hedgerow management at this stage of the project. The precise wording of this is under discussions as part of the SoCG.

Reference	Theme	Issue	Comments	Applicant's Response
WC-041	Issue Specific Hearing (ISH2): Action Point Responses	Action Point 6: Confirm whether any alterations are sought to the wording of the outline Decommissioning Strategy or draft Development Consent Order (dDCO) to secure long term landscape benefit.	3.6. In Section 6.3 Management Review, paragraph 6.3.1 states: "The detailed Decommissioning Strategy will be signed off on completion of the decommissioning works by an appropriately qualified person(s)." 3.7. The council seeks clarity in relation to 'signing off' the detailed decommissioning strategy after the completion of the decommissioning works. The council believes this to mean final sign off at the end of the project and the detailed decommissioning strategy is considered complete by the Undertaker at which point the Undertaker's interest in the land presumably ceases. 3.8. The council does not consider that the Undertaker should be singularly responsible for determining compliance at this critical end point of the scheme and would request that Wiltshire Council as host local planning authority be involved in determining when the detailed	An appropriately qualified person(s) refers to suitably experienced and professionally competent individuals relevant to the activities being undertaken at the time of decommissioning. This would typically be the Environmental Manager but the detailed Decommissioning Strategy would confirm the specific person filling this role. "Signing off" of the completed works means final confirmation that the project has been decommissioned in accordance with the detailed Decommissioning Strategy. The formal sign off process will be confirmed in the detailed Decommissioning Strategy. As the detailed Decommissioning Strategy would require Wiltshire Council's review and approval prior to decommissioning works commencing as part of the discharge of Requirement 20 of the draft DCO, Wiltshire Council would necessarily have input in approving the appropriately qualified person fulfilling this role.

Reference	Theme	Issue	Comments	Applicant's Response
			decommissioning strategy has been satisfactorily completed. 3.9. Furthermore, the term 'an appropriately qualified person(s)' is not clearly defined. Clarity is required as to what an appropriate qualification would be in.	We note that the Outline CEMP [REP4-049] has an equivalent sign off role on the completion of the Construction Phase, but at paragraph 6.3.1 says "<i>by an appropriately qualified person(s) <u>such as the Environmental Manager</u></i>". The Applicant has updated paragraph 6.3.1 of the Outline Decommissioning Strategy [EN010168/APP/7.14] (Revision 4) at Deadline 5 to include "such as the Environmental Manager" to be consistent with the Outline CEMP [REP4-049].
WC-042	Issue Specific Hearing (ISH2): Action Point Responses	Action Point 6: Confirm whether any alterations are sought to the wording of the outline Decommissioning Strategy or draft Development Consent Order (dDCO) to secure long term	Draft Development Consent Order 3.10. As noted above, the council considers that Wiltshire Council, as host local planning authority, should be involved in determining when the detailed decommissioning strategy has been satisfactorily completed. 3.11. A new sub-paragraph should be included within Requirement 20, indicating that the decommissioning	Under paragraph 6.2.3 of the Outline Decommissioning Strategy, a report is required to be produced and submitted to Wiltshire Council on a quarterly basis over the decommissioning phase, and following completion of decommissioning. The report is required to summarise the monitoring process, observed deviations from the detailed Decommissioning Strategy, and the corrective actions taken. Paragraph 6.2.2 also contemplates that the Detailed Decommissioning Strategy

Reference	Theme	Issue	Comments	Applicant's Response
		landscape benefit.	report and certificate of completion should be submitted to the LPA for approval.	would be regularly reviewed and updated throughout the decommissioning phase. As part of the discharge of Requirement 20, more detail on this reporting process can be included within the Detailed Decommissioning Strategy and Wiltshire Council would be required to approve that detail.
WC-043	Issue Specific Hearing (ISH2): Action Point Responses	Action Point 7: Confirm whether any alterations are sought to the wording of the outline Landscape and Ecological Management Plan to provide enough reassurance that existing hedgerows that may not provide sufficient screening (for example Elm hedgerows) will	3.12. The extent of single or dominant species hedgerows present within each site area is difficult to establish given the limited level of detail provided. It is the council's understanding that where such hedgerows exist and are relied upon to provide visual screening mitigation, the Applicant would plant a single secondary line of mixed native hedgerow to reinforce visual screening functions. The council would just note that many field hedgerows have associated field ditches running close and parallel with hedge lines. The presence of associated field ditches may preclude planting of this secondary or widened hedge line as maintenance	The Applicant notes this comment. As stated in paragraph 1.3.24 of the Outline LEMP [REP3-100] proposed new hedgerows will provide additional linking habitat and reinforce the existing green network. Gaps in existing hedgerows will be 'gapped up' (infilled) wherever practicable with new hedgerow and hedgerow tree planting. All new hedgerows and infill planting will comprise of a double staggered row of plants. The Outline LEMP [REP3-100] sets out the proposed ongoing General Management Prescriptions for all vegetation within the order Limits. The

Reference	Theme	Issue	Comments	Applicant's Response
		be appropriately reinforced.	access will be required to clear ditches and keep them functioning.	preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, which would be required to be substantially in accordance with the Outline LEMP [REP3-100] , is secured through Requirement 7 in Schedule 2 of the Draft DCO [REP4-004] .
WC-044	Issue Specific Hearing (ISH2): Action Point Responses	Action Point 11: Confirm whether any alterations are sought to the control documents in relation to proposed lighting as set out in the outline Construction Environmental Management Plan and outline Operation Environmental	3.13. From a landscape and visual perspective, the documents generally note good practice will be employed in the consideration of design of essentially required artificial lighting for construction and operational phases. 3.14. The outline CEMP (Rev 4) [REP3-093] in Section 2.6 Control of light, should additionally incorporate references to accepted industry best practice guidelines i.e. ILP Guidance Note 01 – Guidance for the Reduction of Obtrusive Light, together with ILP GN08/23 Bats and Artificial Lighting 22 which are the most up to date guidance superseding the 2011 ILP Guidance Notes for the Reduction of	The Applicant does not consider that the additional references requested by Wiltshire Council are necessary to secure an appropriate level of control over artificial lighting during either the construction or operational phases of the Scheme. The assessment presented within the Environmental Statement and the mitigation secured through the Outline CEMP [REP4-049] , Outline OEMP [REP4-051] and Outline EPMS [REP4-055] already provide a robust framework for the design, installation and management of artificial lighting.

Reference	Theme	Issue	Comments	Applicant's Response
		Management Plan.	Obtrusive Light (GN01/11) all published by Institution of Lighting Professionals. 3.15. The outline OEMP (Rev 4) [REP3-095] in Section 2.7 Control of Light, should also reference this current industry best practice.	ES Volume 1, Chapter 3 The Scheme [APP-055] explains that, due to the nature of the Proposed Development as a solar photovoltaic generating station, operational lighting requirements are inherently limited. The Solar PV Sites will generally be unmanned, with only occasional maintenance visits required, and there is no requirement for routine night-time operation. Consequently, permanent operational lighting is limited principally to essential security and maintenance purposes, rather than continuous site illumination. The Outline CEMP [REP4-049], Outline OEMP [REP4-051] and Outline EPMS [REP4-055] already secure the principles that artificial lighting will be minimised, directed only where necessary for safety, security or operational purposes, and designed to avoid unnecessary light spill onto surrounding receptors. These documents provide sufficient flexibility to allow the detailed lighting design to reflect the final equipment specifications, whilst

Reference	Theme	Issue	Comments	Applicant's Response
				ensuring that the environmental effects remain within those assessed in the Environmental Statement.
WC-045	Issue Specific Hearing (ISH2): Action Point Responses	Action Point 13: Provide details of cases which support the position of each party on how the duty to further the purposes of the CNL under s85 of the CRow act should be applied.	3.16. The council considers that the Cotswolds National Landscape Board to be the party which is best placed to provide these details to best assist the ExA on this matter.	The Applicant notes this comment.
WC-046	Issue Specific Hearing (ISH2): Action Point Responses	Action Point 16: To submit a marked-up plan to show the reduction of development they seek to reduce	3.17. The council has prepared two plans, the first is a plan for Lime Down Site B, and the second for Lime Down Site D: • Site B – Potential Solar Panel Reduction (WHL-WCC002-02 – July 2026). • Site D – Potential Solar Panel Reduction (WHL-WCC002-03 – July).	The Applicant notes this comment.

Reference	Theme	Issue	Comments	Applicant's Response
		impact of Norton Village setting.	3.18. These plans identify field areas which the council considers should be removed as panel areas in the interests of reducing the impacts on the setting of Norton Village and are attached at Appendix C to this response.	
WC-047	Issue Specific Hearing (ISH2): Action Point Responses	Action Point 19: Mark up on a plan the minor routes where an intra-project sequential visual assessment should take place.	3.19. The council has prepared a plan: • Intra- Project Cumulative Sequential Road Routes (WHL-WCC002-04 – July 2026) 3.20. This plan identifies the minor road routes which the council considers should be included for intra-project sequential visual assessment and is attached at Appendix D to this submission.	The Applicant notes this comment.
WC-048	Issue Specific Hearing (ISH3): Traffic and Transport; and Ecology and Biodiversity	Traffic and Transport	2.1 Construction HGV and AIL Routes 4.1. The council agreed with the general points made by Stop Lime Down that there will be significant impacts to the Cotswolds National Landscape. These are inevitable given the siting of a proposal of such significant scale in this location. As the ExA is undoubtedly aware, the council's overall case is that, at least in	There is currently ongoing engagement with the Cotswold National Landscape Board, where the applicant has provided further clarity regarding the justification for selecting the proposed construction routes through the Cotswold National Landscape (CNL) to access Lime Down A, B and C, as well as cable access locations 101 to 108 serving the Cable Route Corridor. The

Reference	Theme	Issue	Comments	Applicant's Response
			part of the impacts on the CNL, it cannot support the grant of consent for this scheme.	proposed construction routes to Lime Down D and E do not travel through or directly adjacent to the CNL. In summary, the routes that do not travel through the CNL to get to Lime Down A, B, and C and cable access junction 101 to 108 were discounted as they would include • Extensive limited forward visibility; • Extensive lengths of single track lanes; • The requirement for extensive highway mitigation and engineering works; • Schools; • The requirement for extensive vegetation removal; • Narrow or weak bridge structures. The proposed routes are considered to be the least constrained in terms of both meeting the needs of the Scheme and

Reference	Theme	Issue	Comments	Applicant's Response
				minimising environmental effects because they include • Good forward visibility along the majority of the route; • No significant accident hotspots; • Do not pass any schools; • Minimises routing on minor roads through village centres; • Do not comprise extensive lengths of single lane carriageway; • Limited highway mitigation and engineering works required; • Limited requirement for vegetation removal; • No narrow or weak bridge structures. As detailed in Table 13-2 of ES Volume 1, Chapter 13: Transport and Access [REP4-014], the Applicant has engaged with Wiltshire Council regarding the

Reference	Theme	Issue	Comments	Applicant's Response
				construction routes and confirmed that the proposed construction routes were most appropriate for the purposes of the Scheme. The agreement of the proposed construction routes with Wiltshire Council is confirmed in Appendix A of their Relevant Representation submitted to the Planning Inspectorate in January 2026 [RR-4934] at paragraph 16: They state: <i>"Plate 4-3 shows the various construction routes considered for access to Lime Down Sites A-C. It is agreed that the route to / from the M4 via the A46, B4040, B4039 and Fosse Way is the best of the alternatives considered."</i> The same has also been agreed with SLD transport consultant.
WC-049	Issue Specific Hearing (ISH3): Traffic and Transport; and	Traffic and Transport	4.2. However, from a high-level perspective, the council is satisfied that the routes selected are suitable in the	The Applicant makes note of this comment

Reference	Theme	Issue	Comments	Applicant's Response
	Ecology and Biodiversity		context, and that they are the "best" of the alternatives available.	
WC-050	Issue Specific Hearing (ISH3): Traffic and Transport; and Ecology and Biodiversity	Traffic and Transport	4.3. The council's primary concern on traffic and transport matters is how traffic will be able to managed appropriately on the rural routes, given the scheme's location. The construction routes from Sherston northward to Lime Down A to C is very narrow and there is a very narrow route to the west of Dyson Roundabout, all the way up to Bradfield Cottages. The council is concerned about the width of the roads and passing opportunities for two HGVs.	All roads on routes to PV sites are two-way working and not single-track lanes. There are no HGV restrictions on any of the links proposed as construction routes. The Applicant has submitted locations along the construction routes to Lime Down A-C and Lime Down D (via Bradfield cottage) showing two HGVs passing in Annex K of ES Volume 3 Appendix 13-1: Transport Assessment [REP4-037]. As requested, the drawings now include road width geometry at the passing places, which demonstrate at least a 5.5 metre road width to allow two HGVs to pass, as specified by Wiltshire Council. The council considers that additional works to accommodate two-way HGV passage on the rural lanes outside the Alderton Road HIA are required. For clarity, the Applicant is also proposing

Reference	Theme	Issue	Comments	Applicant's Response
				widening along the Fosse Way, which is outside of the HIA works on Alderton Road. The proposed widening works on Alderton Road and Fosse Way are shown in Annex I of ES Volume 3 Appendix 13-1: Transport Assessment [REP4-037]. At the request of the Examining Authority, the applicant has also submitted information at Annex I of ES Volume 3 Appendix 13-1: Transport Assessment [REP4-037] showing locations where widths of 5.5 metres and 6.0 metres will be available.
WC-051	Issue Specific Hearing (ISH3): Traffic and Transport; and Ecology and Biodiversity	Traffic and Transport	4.4. With regard to the ExA's query regarding the weight restriction in Acton Turville, the council indicated that the road was within the administrative area of South Gloucestershire council. However, where a weight restriction was in place "except for access", this refers to access to the location, not through the location.	The Applicant makes note of this comment. Any reference to the use of this route was removed at Deadline 4 and does not form part of the proposed construction or AIL routing.

Reference	Theme	Issue	Comments	Applicant's Response
WC-052	Issue Specific Hearing (ISH3): Traffic and Transport; and Ecology and Biodiversity	Traffic and Transport	2.2 Construction Traffic – HGV Forecasting 4.5. Whilst the council have not done their own detailed calculations, however the HGV generation predictions remain a Wiltshire Council concern and an unresolved matter in the SoCG. Latest Wiltshire Council comments on this matter were provided in the deadline 1 response to the ES Volume 3, Appendix 13-1 Transport Assessment (Rev 2) within the council's Local Impact Report [REP1-137]. In respect of key concerns: • P.34 The supporting calculations undertaken for Modules and Mounting Structures for each Lime Down site have not been fully provided or verified by evidence from existing solar farm sites. For example, whilst the total number of assumed PV Modules for each of the Lime Down sites (A-E) has been provided, it is unclear how these quantities have been derived. The area occupied by panels on each site will be known (Works	The Applicant has submitted revised trip generation calculations in the same format as the SLD calculations at Deadline 5. This document is titled 'Highways Technical Note in response to Appendix A of the SLD Deadline 4 submission' [EN010168/EXAM/9.64]. These calculations have now been discussed with SLD's transport consultant.

Reference	Theme	Issue	Comments	Applicant's Response
			Area 1), but the density/ha assumed and how this compares with the assumptions adopted for other consented solar farm sites or those in operation is unknown. The same query applies to module mounting 24 structures, as assumptions made regarding the type of mounting structures or foundations / supports are also absent. • P.35 The 'waste' calculations account for only removal of packaging, so seemingly exclude any allowance for removal of excavated 'spoil' material associated with the construction of the access trackways, the construction compounds and the foundation bases for the BESS and 440kV and 132KV substations. This is of concern as the Outline Construction Traffic Management Plan (Rev 2) [REP1-112] refers in Table 3 to a volume of excavated soil that is likely to be deemed unsuitable for refill and compaction of circa 139,666 cubic metres.	

Reference	Theme	Issue	Comments	Applicant's Response
			4.6. Item 1 is a concern arising from past discussions with Stop Lime Down and notably review of Appendix D 'Transport Report'; to their Written Representation. Table 2 in the SLD report [REP1-172], which shows the typical HGV / ha ratios for PV Module / Mounting Structure deliveries at other solar array sites, is of concern, as what is assumed for Lime Down is clearly less than any of the other comparison sites by a considerable margin. 4.7. The council wishes to avoid a situation where the actual movement of vehicles significantly exceeds what's been estimated. The council also raised concern regarding the timescales for discharge of the detailed management plans, that given the other pressures on the council, it might be challenging to assess the vehicle numbers put forward by the Applicant in a sufficiently detailed and robust manner.	

Reference	Theme	Issue	Comments	Applicant's Response
			4.8. It was noted that within the examination, there was six-months to ensure that the vehicle estimates were right, and that the ExA had confidence that the figures were realistic and that they were precautionary. At present, the council still has serious concerns that the points raised by SLD haven't been fully resolved. 4.9. The council will review any further submissions from SLD and the Applicant once they are submitted, and provide comment at the appropriate deadline.	
WC-053	Issue Specific Hearing (ISH3): Traffic and Transport; and Ecology and Biodiversity	Traffic and Transport	2.3 Construction Traffic – Light Vehicle and Shuttle Bus Forecasting 4.10. Whilst this item was not specifically covered at the Hearing, as stated in the council's response to ExA questions (ExQ1 TT1.18) [REP3-142], in the council's initial Highway Development Management comments on the 'Scoping Note for the CTMP and Transport Assessment that the assumption that 50% of workers would arrive by shuttle bus	The use of shuttle buses by construction workers can be secured through the detailed CTMP which is a Requirement of the DCO (Requirement 15). The final CTMP will include details on incentives for use of shuttle bus and car sharing and a Construction Worker Travel Plan. As set out in the Outline CTMP [REP4-057], it is likely that most construction workers would be non-local and would be housed together in nearby

Reference	Theme	Issue	Comments	Applicant's Response
			seemed high, despite the reasoning set out that this was based on acceptance in solar farm DCO applications elsewhere. The council advised that it preferred to see a lower shuttle bus assumed mode-share used. It thus remains a concern that a lower figure should have been used as advised at scoping to examine a 'worst case' traffic loading on local roads. Unless the 'home' or origin location of workers / operatives is somehow concentrated, it is also difficult to see how workers could be encouraged to use a 'shuttle' bus service to the Lime Down PV sites if this itself would require a longer car trip to the departure / 'pick up' point. 4.11. In response to the same Examining Authority question, the council also stated that the spread of expected construction workers across the Lime Down A-E sites based on area size alone was considered somewhat simplistic. It would be expected that the 400kV substation and the BESS, which are both in the Lime Down D area, would attract	accommodation and transported to site by minibus. The usage of the minibus can be monitored through the keeping of a logbook, which would be kept in the site management office and made available to the local authority for inspection at any time. In accordance with the Outline CTMP [REP4-057] and the Construction Worker Travel Plan, shifts will be organised to avoid construction worker movements between 08:00-09:00 and 17:00-18:00 and arrivals and departures will be spread over more than a single hour. Therefore, the increase in vehicle numbers is unlikely to result in material delays. The site is located within a predominantly rural area where baseline traffic flows on the surrounding highway network are relatively low, and roads generally operate well within capacity. The avoidance of peak period travel ensures that construction worker movements do not contribute to congestion, increased delay, or materially impact junction

Reference	Theme	Issue	Comments	Applicant's Response
			well above the 'average' for the solar sites.	capacity. The impact is also temporary. Construction worker information was based on information provided by a contractor. The Applicant took the peak number of construction workers (622) over the entire draft construction programme and distributed it proportionally across the solar PV sites. A check was then made comparing the peaks on each construction route against the distributed 622 figure, finding that these peaks were lower. Accordingly, the proportional distribution of 622 workers was assessed as it provided a more robust worst-case for assessment. The draft programme is subject to change and will be set out in the final CTMP. The Applicant therefore used these figures as AADTs in the assessment. This approach was used to provide a worst-case assessment against the methodology used for the ES assessment presented in ES Volume 1,

Reference	Theme	Issue	Comments	Applicant's Response
				Chapter 13: Transport and Access [REP4-014].
WC-054	Issue Specific Hearing (ISH3): Traffic and Transport; and Ecology and Biodiversity	Traffic and Transport	2.4 Highway User Safety 4.12. Wiltshire Council's view expressed at outset in its Written Representation [REP1-138] was that the opportunities for accommodating 2-way passage for two HGVs on many of the narrow rural roads being proposed for construction trafficking are less than ideal and so likely to create operational and road safety risks. It is also clear from the swept path analyses undertaken that many lengths have insufficient carriageway width for passing even an HGV and a light vehicle. The Applicant alleges that the proposed booking system set up to manage HGV arrivals and departures will be able to hold back any HGV cross-over should there be any delays on the roads, so preventing HGVs generated by the Scheme passing each other in opposite directions on the local roads forming part of the construction routes. However, the council	The Applicant doesn't state that the booking system will completely remove the probability of two HGVs meeting. The booking system helps to reduce the probability of two HGVs meeting and is a standard element of most construction projects. The Applicant has submitted locations along construction routes showing two HGVs passing in Annex K of ES Volume 3 Appendix 13-1: Transport Assessment [REP4-037]. As requested, the drawings now include road width geometry at the passing places, which demonstrate at least a 5.5 metre road width to allow two HGVs to pass, as specified by Wiltshire Council. For clarity, the Applicant is also proposing widening along Fosse Way, which is outside of the HIA works on Alderton Road, as shown in Annex

Reference	Theme	Issue	Comments	Applicant's Response
			do not consider that the risk of two opposing HGVs meeting on a reasonably regular basis can be totally removed by the booking system.	K of ES Volume 3 Appendix 13-1: Transport Assessment [REP4-037]. Further details of the proposed highway improvement works are included in Annex I of ES Volume 3 Appendix 13-1: Transport Assessment [REP4-037].
WC-055	Issue Specific Hearing (ISH3): Traffic and Transport; and Ecology and Biodiversity	Traffic and Transport	4.13. The council also noted that in accordance with SLD's comments, these rural lanes were regularly used by walkers and cyclists, and there are parts of the roads which have no verges and steep banks on both sides. Therefore, if you were a pedestrian, there would be limited opportunity to step out of the way due to the bank.	Given these routes already experience HGV's and deliveries are set to outside of peak hours, there is no existing accident record on Fosse Way or Bradfield Cottages and the deliveries are managed through the Outline CTMP [REP4-057] the conclusion is that the likely effects of the increase in vehicle numbers including HGVs on road users and pedestrian safety, including changes to fear and intimidation of NMUs, is likely to be negligible. It is also noted that the construction period is temporary, and would not lead to a permanent change to highway safety. In accordance with the highway code an approximate road width of 5.0 metres is required to pass a pedestrian (2.0

Reference	Theme	Issue	Comments	Applicant's Response
				metres space + 0.5 metre pedestrian width + 2.5 metre HGV width). This is available along a majority of the proposed construction routes, meaning there is a low probability of a pedestrian having to step onto a verge.
WC-056	Issue Specific Hearing (ISH3): Traffic and Transport; and Ecology and Biodiversity	Traffic and Transport	4.14. Furthermore, it would have been helpful if base topographical survey drawings for 'all' the minor roads forming the HGV construction routes could be provided, with the actual carriageway width dimensions indicated at intervals. It was suggested by Wiltshire Council that each road should employ a chainage line, with widths indicated at, say, 10m intervals. As 5.5m is the minimum width necessary for 2-way HGV passage, and 4.8m for car / HGV passage (MfS), it would be helpful to colour-shade route sections with carriageway widths 5.5m or greater and 4.8-5.5m, with unshaded lengths then indicating lengths with a width of less than 4.8m. This would provide a better 'at a glance' suitability of the existing routes, which is difficult to pick	The Applicant makes note of this comment. Drawings have been included at Annex I of ES Volume 3, Appendix 13-1: Transport Assessment [REP4-037] showing areas of highway above 5.5 metres in width and above 6.0 metres. All areas not highlighted are below 5.5 metres in width.

Reference	Theme	Issue	Comments	Applicant's Response
			up from the swept path plots where a lot of underlying base detail is masked.	
WC-057	Issue Specific Hearing (ISH3): Traffic and Transport; and Ecology and Biodiversity	Traffic and Transport	2.5 Highway Improvement Areas (HIAs) 4.15. In response to the ExA's question on whether there was a standard visibility distance before a passing bay needs to be installed, the council indicated that it would depend on the nature of the road. If there were lots of bends in the road, a reduced spacing would be required if users couldn't see around a bend. Regardless, the user must be able to see clearly to the point of the next passing bay, to make a decision on whether they could move forward. This would be 100 to 150m. However, if the road was very sinuous, passing bays would be required more frequently. It would depend on the alignment of the road, horizontal and vertical, and any vegetation. Two HGV drivers must have adequate opportunity to see each other in time, so that a position where one of them had to reverse along the highway was	The Applicant makes note of this comment. Drawings have been included at Annex I of ES Volume 3, Appendix 13-1: Transport Assessment [REP4-037] showing areas of highway above 5.5 metres in width and above 6.0 metres. All areas not highlighted are below 5.5 metres in width. The intervisibility between passing places is shown in the tracking drawings provided in Annex J and K of ES Volume 3, Appendix 13-1: Transport Assessment [REP4-037]. This shows clear lines on visibility between the proposed passing places. There is no standard requirement on maximum visibility between passing place, but all distances shown are considered reasonable. Any longer sections of visibility between on passing places are shown on the

Reference	Theme	Issue	Comments	Applicant's Response
			avoided. If it wasn't possible to see around a bend, a passing place should be in close proximity to the bend in order for an evasive manoeuvre to be made quickly.	Fosse Way, which provides a straight and clear line of sight.
WC-058	Issue Specific Hearing (ISH3): Traffic and Transport; and Ecology and Biodiversity	Traffic and Transport	4.16. The council considered that the road speed was less of an issue, as you would expect the user to drive according to the alignment of the road.	The Applicant makes note of this comment.
WC-059	Issue Specific Hearing (ISH3): Traffic and Transport; and Ecology and Biodiversity	Traffic and Transport	4.17. However, if insufficient passing places are put in place, vehicles will overrun the verge, which could result in substantial highway damage. This in turn would lead to a safety concern, because if the road breaks up, road users will try to avoid the damaged carriageway by taking more evasive manoeuvres, which has a safety implications in itself.	See response to 4.3, which addressed the adequacy of opportunities for two HGV to pass. In addition, the Outline CTMP [REP4-057] set out the requirement to undertake pre-construction, interim and post-construction road condition surveys. The full scope of the areas included will be agreed as part of the Final CTMP which must be substantially in accordance with the Outline CTMP [REP4-057] which will be secured through Requirement

Reference	Theme	Issue	Comments	Applicant's Response
				15 of Schedule 2 to the Draft DCO [REP4-004].
WC-060	Issue Specific Hearing (ISH3): Traffic and Transport; and Ecology and Biodiversity	Traffic and Transport	4.18. With respect to the existing HIA proposed along Alderton Road and shown in Annex I to ES, Appendix 13-1 Transport Assessment (Rev 2) [REP1-060], full council comments were provided in the deadline 2 response at 12.10-12.11 and 12.20 [REP2-048]. In short, whilst a welcome revision, the planned proposals remain very high-level and in outline. It is considered detailed drawings based on a topographical survey base would need to be submitted to Wiltshire Council for full technical approval as part of DCO provisions. It is also unclear whether these passing bay works are intended to be permanent, or just temporary and removed at the end of the construction period. The current detail does not even include the proposed length of each treatment area and resultant carriageway width dimensions.	Detailed drawings of the proposed passing places using topographical surveys have been submitted in Annex I of ES Volume 3, Appendix 13-1: Transport Assessment [REP4-037]. The proposed passing places are proposed to be temporary as confirmed in Table 13-20 of ES Volume 3, Appendix 13-1: Transport Assessment [REP4-037] submitted at Deadline 4.

Reference	Theme	Issue	Comments	Applicant's Response
WC-061	Issue Specific Hearing (ISH3): Traffic and Transport; and Ecology and Biodiversity	Traffic and Transport	4.19. The council considers that other HIA outside of the current defined 8A / 8B Works Areas are needed to accommodate passing place mitigation measures for two opposing HGVs on the narrow rural roads to be used for construction trafficking. This follows the review of Annex K to ES Volume 3, Appendix 13- 1 Transport Assessment (Rev 2) [REP1-060] which showed the swept path analyses for two 16.5m articulated HGVs [See REP2-048]. Other roads requiring mitigation works to improve HGV passage opportunities are as follows: • Fosse Way (South): [Drawing SP54, §12.21 of 2-048] Whilst there are some possible passing points indicated for two 16.5m articulated HGVs to the south of the railway bridge, it is also the case that the intervisibility between some of these is very long. For example, there is length of over 200m just south of the junction by Frome Lodge, and a length of 424m where passage for two HGVs is not possible to the north of this junction. In	All roads on routes to PV sites are two-way working and not single-track lanes. There are no HGV restrictions on any of the links proposed as construction routes. The Applicant has submitted locations along the construction routes to Lime Down A-C and Lime Down D (via Bradfield cottage) showing two HGVs passing in Annex K of ES Volume 3 Appendix 13-1: Transport Assessment [REP4-037]. As requested, the drawings now include road width geometry at the passing places, which demonstrate at least a 5.5 metre road width to allow two HGVs to pass, as specified by Wiltshire Council. The council considers that additional works to accommodate two-way HGV passage on the rural lanes outside the Alderton Road HIA are required. For clarity, the Applicant is also proposing widening along the Fosse Way, which is outside of the HIA works on Alderton Road. The proposed widening works on

Reference	Theme	Issue	Comments	Applicant's Response
			short, it is considered that mitigation will be needed in the form of additional passing bay works which aren't currently proposed • Fosse Way (North) [Drawing SP55, §12.22 of 2-048]: HGV tracking checks to the north of the railway bridge are incomplete, notably a long length south of the junction with Farhill Lane. This needs to be completed to allow a complete council review of the HGV passing 27 opportunities within this length of Fosse Way. • Dyson RBT to Bradfield Cottages [Drawing SP51]: The length of specific concern is to the NW of the junction with The Street at Hullavington. The first circa 150m length from the junction to the bend is a concern because of its usage by pedestrians / no verge, but it is accepted that passage mitigation here will be very difficult, whilst HGV inter-visibility would appear possible from potential passing points at the junction and the bend.	Alderton Road and Fosse Way are shown in Annex I of ES Volume 3 Appendix 13-1: Transport Assessment [REP4-037]. Drawing SP55 has been updated to include for additional tracking and is included at Annex K of ES Volume 3 Appendix 13-1: Transport Assessment [REP4-037]. Drawing SP51 has been updated to include for additional tracking and geometries as requested and is included at Annex K of ES Volume 3 Appendix 13-1: Transport Assessment [REP4-037]. The section referred to between the bend to the north-west and the junction with The Street is a straight flat section of road, which provides a clear line of sight unaffected by the vertical alignment. Drawing PL300 has now been prepared and is included in Annex K of ES Volume 3, Appendix 13- 1: Transport Assessment [REP4-

Reference	Theme	Issue	Comments	Applicant's Response
			- Between the bend and the access to Brookside, so where the route also passes under the railway, the analyses suggest the carriageway width to be quite variable, so providing a series of short sections potentially suitable for passing HGVs with similarly short narrow sections between them. Whilst this at face value suggests no mitigation may be needed to further improve passing provision for HGVs through this length, it would be helpful to see some carriageway width dimensions additionally provided at intervals on this drawing, or a supporting drawing, to confirm widths in the passing zones indicated are a minimum of 5.5m and ideally greater. In short, the opportunity for improvements to extend the length of the passage zone for two HGVs should not be dismissed. - To the north of Brookside, the swept analysis indicates that there is no passing opportunity for two HGVs between this junction and the access to the Flying Monk Café. Whilst a 132m inter-visibility	037]. This demonstrates vertical visibility over the 132-metre distance between the Brookside junction and the Flying Monk Cafe. Drawing SP51 included in Annex K of ES Volume 3, Appendix 13-1: Transport Assessment [REP4-037] now shows a 10-metre tipper using the suggested concrete apron on the west side of the carriageway and passing a 16.5 metre articulated vehicle. This reduces forward visibility to approximately 75 metres. 83% of HGVs accessing Lime Down D (west) will be 10 metre tippers or rigid vehicles. The Applicant maintains that no mitigation works to improve HGV passage under the DCO are needed outside of the DCO order limits.

Reference	Theme	Issue	Comments	Applicant's Response
			line is indicated, examination of Google Earth footage suggests it may be quite difficult for two opposing HGV drivers to see one another clearly, as the road line bends slightly between the two points and the hedge line on the western line could screen this view. • The final part of the route from the Flying Monk Café access to the proposed Lime Down D access points (Refs 7, 8 and 20) has some limited passing positions for two HGVs but most of the road length is too narrow, which is a concern as some of the inter-visibility sightlines indicated are quite long, with a 167m spacing in one case. As this length is close to the Lime Down area D access points, it 'may' be easier to manage and prevent any HGV departure if an incoming HGV is observed within this section. However, the Council would prefer to see some mitigation works considered and included in improving passing opportunity provision	

Reference	Theme	Issue	Comments	Applicant's Response
WC-062	Issue Specific Hearing (ISH3): Traffic and Transport; and Ecology and Biodiversity	Traffic and Transport	4.20. In addition to the above, the council queried the need for bespoke holding areas for arriving HGVs. The Outline CTMP advises that a booking system would be employed for HGV deliveries to each Lime Down site to co-ordinate arrival slots, this then used to time departures to avoid opposing HGV conflicts within the narrow roads proposed for construction access as far as possible. However, some HGVs making deliveries will inevitably arrive earlier than their allocated 'slot' time, or possibly later due to travel delays. In either scenario, a 'holding' location will be needed for these HGVs to wait as may be required after contacting the site manager. It is still unclear where this is intended to be on the planned construction route to Lime Down areas A-C, although a location towards the southern end of Fosse Way would seemingly be logical. Similarly, 28 it is still unclear where this intended holding area would be on the route to Lime Down area D. The point made is that unless	The Applicant makes note of this comment. As set out in the Outline CTMP [REP4-057], the booking system would require incoming vehicles to contact the site manager when approaching the site. This will allow departing vehicles to be held back in the construction compounds to avoid where possible two HGVs passing on minor roads on the construction routes. For incoming vehicles arriving earlier than their allocated 'slot' time, or possibly later due to travel delays, suggested holding locations have been included in the Outline CTMP [REP4-057]. On rare occasions where arriving HGVs might not make contact with the site manager or will not be able to use the identified holding locations, there will still be frequent opportunities for two HGVs to pass as demonstrated at Annex K of ES Volume 3 Appendix 13-1 Transport Assessment [REP4-037].

Reference	Theme	Issue	Comments	Applicant's Response
			suitable existing lay-by 'holding' facilities exist for HGVs on the inbound construction routes, which can also be reserved for LDSF construction usage, then other works outside the HIA may be needed to deliver these. 4.21. The council stated that whilst 5.5m would be the absolute minimum width to allow HGVs to pass, in order to provide comfort, ideally this would be 6m.	At the request of the Examining Authority, the applicant has also submitted information at Annex I of ES Volume 3 Appendix 13-1: Transport Assessment [REP4-037] showing locations where widths of 5.5 metres and 6.0 metres will be available.
WC-063	Issue Specific Hearing (ISH3): Traffic and Transport; and Ecology and Biodiversity	Traffic and Transport	2.6 Construction Traffic Management Plan 4.22. Whilst it is acknowledged that this agenda item was not covered in the Hearing, Wiltshire Council wishes to comment regarding Highway Condition surveys and damages mitigation, and whether this is better covered in a separate s59 (Highways Act) Agreement with the Applicant rather than obligations being subsumed with the OCTMP. Full comments on this point were covered in the Deadline 2 response [REP2-048 at	Section 59 of the Highways Act 1980 provides for the recovery of excess expenses in the cost of maintaining the highway due to "<i>extraordinary traffic</i>". The Applicant does not consider that the traffic associated with the construction of the Scheme is extraordinary. In any event, the Outline CTMP [REP4-057] provides for road traffic condition surveys and rectification of any damage caused by construction traffic. The Applicant is therefore already bound by Requirement 15 in Schedule 2 to

Reference	Theme	Issue	Comments	Applicant's Response
			§22] to Outline Construction Traffic Management Plan (Rev 2) [REP1-112].	the Draft DCO [REP4-004] to rectify any damage to the highways.
WC-064	Issue Specific Hearing (ISH3): Traffic and Transport; and Ecology and Biodiversity	Traffic and Transport	4.23. The council do not consider that the Outline CTMP or a final CTMP to be the appropriate mechanism for the technical approval of permanent highway works. This is not considered a substitute for 'requiring' bespoke highway agreements where necessary under Article 15 of the DCO for all works undertaken within the public highway, where such agreements would normally subsume the technical approval requirement of all drawings and allied documentation. However, the preferred approach to this, which is a matter currently under discussion with the Applicant, is to include all these technical approval requirements within bespoke Wiltshire Council Protective Provisions in Schedule 15 to the DCO. Once these Protective Provisions are agreed and written in, then it would simply be necessary to additionally reference these	Both the Applicant and Wiltshire Council provided their preferred versions of the protective provisions at Deadline 4. Given the productive discussions between the Applicant and Wiltshire Council to date regarding the draft protective provisions for its benefit as local highway authority, the Applicant considers protective provisions are likely to be agreed before the end of examination. The Applicant provided its amendments to Wiltshire Council, together with reasons, on 30 June 2026. The Applicant is awaiting comments from the Council. Notwithstanding Wiltshire Council's in principle views regarding the function of the Outline CTMP [REP4-057], Requirement 15 of the draft DCO [REP4-004], and the detailed CTMP as the mechanism for approval of highway works, it is standard for such matters to be controlled by a Construction Traffic

Reference	Theme	Issue	Comments	Applicant's Response
			in the Outline CTMP. 4.24. This item is also covered in ISH4	Management Plan for Nationally Significant Infrastructure Projects under the Planning Act 2008. The Applicant is progressing protective provisions at Wiltshire Council's request which will overlap in function for the approval of these works with the Outline CTMP [REP4-057] . In practice the approval mechanisms available to the Council through the protective provisions will to some extent duplicate its function in discharging the detailed CTMP, but because they do not overlap in all respects, the Outline CTMP [REP4-057] and Requirement 15 are still an essential component of the Scheme and draft DCO.
WC-065	Issue Specific Hearing (ISH3): Traffic and Transport; and Ecology and Biodiversity	Ecology and Biodiversity	3.1 Survey Work 4.25. To save duplication of text, please read the comments below relating to 3.1. Survey Work alongside Wiltshire Council's response to Action Point 14 from the ExA which is presented in the next section of this document.	The Applicant has provided a response to each comment in turn below.

Reference	Theme	Issue	Comments	Applicant's Response
			4.26. Wiltshire Council notes that this agenda heading and summary text does not stipulate that the topic pertains solely to habitat survey work and on that basis, offers the following observations.	
WC-066	Issue Specific Hearing (ISH3): Traffic and Transport; and Ecology and Biodiversity	Ecology and Biodiversity	4.27. Wiltshire Council has consistently raised concern regarding the lack of Phase 2 / species-specific survey within the Cable Route Corridor (CRC), including but not limited to, bat survey within the section of the CRC that falls within the 4km 29 greater horseshoe consultation zone around the Box Mine component of the Bath and Bradford-on-Avon Bats Special Area of Conservation (SAC).	The Applicant acknowledges the Council's continued concern regarding the scope of surveys undertaken within the Cable Route Corridor. The Applicant has consistently maintained the view that the survey scope and effort for the Cable Route Corridor is appropriate and proportion to the likelihood of significant effects occurring. The Applicant notes the scope for bat surveys within the Cable Route Corridor, (including where it intersects the consultation zone of the Box Mine component of the Bath and Bradford-on-Avon Bats SAC), has been agreed with Natural England as set out in the Statement of Common Ground with Natural England [REP4-064].

Reference	Theme	Issue	Comments	Applicant's Response
WC-067	Issue Specific Hearing (ISH3): Traffic and Transport; and Ecology and Biodiversity	Ecology and Biodiversity	4.28. The council has also raised some queries regarding the scope and level of Phase 2 / species-specific survey within the Solar PV Sites. 4.29. As set out in British Standard (BS) 42020:2013 Biodiversity — Code of practice for planning and development, supporting ecological information should be appropriate for the purpose intended and sufficient in terms of species likely to be affected; it should cover a suitably wide area of study commensurate with the requirements of the species or feature of interest, including connected systems (e.g. downstream); and should be undertaken over a sufficient period of time and at an appropriate time of year to yield sufficient details of populations or habitat characteristics. 4.30. The provision of incomplete ecological baseline information as a result of inadequate ecological survey has implications for the robustness and accuracy of Chapter 9 of the	The Applicant agrees that, as set out in BS 42020:2013 Biodiversity – Code of practice for planning and development, ecological information should be appropriate for the ecological features potentially affected, and sufficient to inform the assessment of likely significant effects. Section 5.5 of BS 42020:2013 states that ecological surveys should be proportionate to the predicted degree of risk to biodiversity and to the nature and scale of the proposed development. Consequently, BS 42020:2013 does not direct surveys to be undertaken over the maximum conceivable area or extent in all circumstances; rather, survey scope should be informed by the likelihood of impacts occurring and the information necessary to support a robust assessment.

Reference	Theme	Issue	Comments	Applicant's Response
			Environmental Statement (ES) and the Habitats Regulations Assessment (HRA). Furthermore, it undermines confidence in the assessments therein as well as the avoidance, mitigation, minimisation and compensation measures proposed in respect of whether the measures are adequate and whether the principles of the mitigation hierarchy have been wholly applied. It also draws into question whether further measures over and above those proposed may have been found necessary as a result of targeted survey as well as whether any species-specific mitigation licences may be required, where presently there has been no discussion of such need within the ES. This is notwithstanding that at Deadline 2 the Applicant provided evidence in the form of an Impact Assessment and Conservation Payment Certificate (IACPC) counter-signed by Natural England (NE) [REP2-041] that an application to Natural England (NE) has been approved for use of the District Level	The Applicant maintains that the survey strategy adopted at the Cable Route Corridor accords with this principle. A lower scope and effort of surveys was undertaken at the Cable Route Corridor than at the Solar PV Sites. This was determined having regard to the temporary nature of works, the absence of permanent operational effects, and the refinement of the construction working width for cabling works and the detailed design stage to approximately 25 m (narrower at hedgerow breaches) and the reinstatement of all habitat on completion of works. The Applicant therefore maintains the information collected is proportionate to the nature of works and ecological risks associated with different elements of the Scheme, the ecological features present, the potential impact pathways, and the likelihood of significant effects occurring.

Reference	Theme	Issue	Comments	Applicant's Response
			Licensing (DLL) Great crested newt (GCN) Scheme.	Overall, the Applicant maintains the survey strategy is sufficient to inform the impact assessment and the conclusions presented within ES Volume 1, Chapter 9: Ecology and Biodiversity [REP4-010] .
WC-068	Issue Specific Hearing (ISH3): Traffic and Transport; and Ecology and Biodiversity	Ecology and Biodiversity	4.31. Full details pertaining to the matters and concerns raised by Wiltshire Council relating to the scope of survey work can be found in: • Wiltshire Council's Relevant Representation [RR-4934]; • Wiltshire Council's Local Impact Report (LIR) [REP1-137]; • Wiltshire Council's Written Representation [REP1-138]; • Wiltshire Council Comments on Submissions Received at Deadlines 1 and 1A [REP2-048];	The Applicant notes the documents listed by the Councils and refers to the Applicant's responses provided to the matters relating to the scope of surveys in the following documents: • Applicant's Response to Relevant Representations [PDA-009] • Applicant's Response to the Local Impact Report [REP2-038] • Applicant's Response to Written Representations [REP2-039] • Applicant's Response to the Examining Authority's First Written Questions [REP3-128]

Reference	Theme	Issue	Comments	Applicant's Response
			• Wiltshire Council Comments on Submissions Received at Deadline 2 [REP3-141]; • Wiltshire Council Response to ExA's First Written Questions (ExQ1) [REP3-142]; and • 8.2 Statement of Common Ground with Wiltshire Council [REP2-025].	• Applicant's Response to Comments Received at Deadline 2 [REP3-129] • Statement of Common Ground with Wiltshire Council [REP4-061] • Applicant's Response to Submissions Received at Deadline 3 [REP4-082]
WC-069	Issue Specific Hearing (ISH3): Traffic and Transport; and Ecology and Biodiversity	Ecology and Biodiversity	3.2 Approach to Habitats Hedgerows 4.32. To save duplication of text, please read the comments below relating to 3.2. Habitats, sub-category Hedgerows, in conjunction with Wiltshire Council's response to Action Point 18 from the ExA which is presented in the next section of this document. 4.33. Wiltshire Council has consistently raised concern regarding the Applicant's approach to hedgerows, particularly the scope of Schedule 12 of the Draft DCO affording overly wide powers; and the lack	The Applicant notes Wiltshire Council's continued concern regarding the approach to hedgerows. The Applicant has addressed these points previously, most recently in the Applicant's Response to Submissions Received at Deadline 3 [REP4-082]. The Applicant refers to the response provided at Reference WC-077 (page 152 to 153) on the subject of consideration of

Reference	Theme	Issue	Comments	Applicant's Response
			of identification and appropriate consideration of impacts on hedgerows that qualify as 'important' under the Hedgerow Regulations 1997 within the ES Chapter 9 and ES Volume 3, Appendix 9-1: Ecological Baseline Report [APP-198]. 4.34. Most recently, Wiltshire Council Comments on Submissions Received at Deadline 2 [REP3-141] encompassed commentary on The Applicant's Response to Written Representations [REP2-039], including counter responses to the Applicant's responses against References WC-050 to WC-054 inclusive pertaining to the Draft Development Consent Order (DCO) and hedgerows. Although the Applicant has attempted to justify the approach applied, a number of important issues remain unaddressed, unsubstantiated and a cause for concern.	hedgerows qualifying as 'important' under the Hedgerow Regulations (1997). The Applicant also refers to the response provided at Reference WC-078 (page 157 to 158) on the subject of the powers conferred in Schedule 12 of the Draft DCO [REP4-004] relating to hedgerow removal.
WC-070	Issue Specific Hearing (ISH3): Traffic and Transport; and	Ecology and Biodiversity	Ancient Woodland 4.35. Wiltshire Council has consistently raised queries about the Applicant's approach to ancient woodland and has	4.35: The area in question at North Bincombe Wood has been subject to a change in design to ensure that the 15m buffers for Ancient Woodland

Reference	Theme	Issue	Comments	Applicant's Response
	Ecology and Biodiversity		concerns that some areas of ancient woodland could be subject to direct adverse impacts and that inadequate buffers will be implemented in contravention of Natural England and the Forestry Commission's 'standing advice', which requires 15m buffers from ancient woodland. (Standing advice can be found here: Ancient woodland, ancient trees and veteran trees: advice for making planning decisions - GOV.UK). For example, the council has repeatedly raised concern regarding the potential for impacts to the edge of North Bincombe Wood bordering Line Down E, including in Wiltshire Council's Relevant Representation [RR-4934] and Wiltshire Council's Local Impact Report (LIR) [REP1-137]. 4.36. Natural England's Response to the Examining Authority's first written questions [AS-018], published on 29th June 2026, has been reviewed ahead of ISH3. In respect of NE's response to question HRA1.2 Bath and Bradford-on-	are maintained and the access track has been rerouted to reflect this. An updated version of ES Volume 2, Figure 3-4-5.1 to 5.2 Landscape and Ecology Mitigation Plan was submitted at Deadline 4 [REP4-016]. This shows a realigned access track which does not encroach into the 15m buffer zone of North Bincombe Wood. Furthermore Table 4 of the Outline Construction Environmental Management Plan (CEMP) [REP4-049] has been updated to confirm that any upgrades to the existing track which runs alongside North Bincombe Wood will follow a specialist 'no-dig' construction methodology and specification to avoid the need to excavate and potentially incur root damage. It is also stated that no heavy vehicles or machinery will be used along the existing track where it is adjacent to North Bincombe Wood. 4.36. The Applicant notes this response.

Reference	Theme	Issue	Comments	Applicant's Response
			Avon SAC, WC notes that NE's response includes the following statement: "Regarding avoidance of impacts, previous discussion between the applicant and Natural England included discussion of the inclusion of a minimum of 15m buffer zones to all hedgerows, trees, and woodland edges to avoid impacts specifically to avoid and retain the functionality these habitats provide to bats." 31 4.37. Whilst the council recognises and welcomes the Applicant's intention to implement 15m buffer zones to all hedgerows, trees and woodland edges, the council wishes to highlight that this approach doesn't appear to be consistently proposed across the entire Order Limits. As aforementioned, the council has raised concern on a number of occasions regarding the potential for adverse impacts to ancient woodland, notably North Bincombe Wood bordering Lime Down E, where there is potential for adverse impacts upon, and damage to the	4.37: See response to 4.35

Reference	Theme	Issue	Comments	Applicant's Response
			edge of the woodland which has been subsumed within the Order Limits boundary, and that as such, the required 15m buffer zone would not be applied at this location. As previously stated, full details of our comments on this matter are provided in RR-4934 and REP1-137.	
WC-071	Issue Specific Hearing (ISH3): Traffic and Transport; and Ecology and Biodiversity	Ecology and Biodiversity	4.38. The Deadline 3 submissions from Lime Down Solar Park Ltd do not appear to include any plans that illustrate that the proposed internal access track has been realigned to avoid incursion into either North Bincombe Wood itself or the requisite 15m buffer to the ancient woodland. The council considers it should be wholly feasible for this information to be provided at this juncture in order to provide sufficient information regarding the change in proposals for this access track. As it stands, the council's concerns on this matter have not been allayed.	The Applicant acknowledges the Council's concern regarding North Bincombe Wood and an updated version of ES Volume 2, Figure 3-4-5.1 to 5.2 Landscape and Ecology Mitigation Plan has been submitted at Deadline 4 [REP4-016]. This shows a realigned access track which does not encroach into the 15m buffer zone of North Bincombe Wood. Furthermore Table 4 of the Outline CEMP [REP4-049] has been updated to confirm that any upgrades to the existing track which runs alongside North Bincombe Wood will follow a specialist 'no-dig' construction methodology and specification to avoid

Reference	Theme	Issue	Comments	Applicant's Response
				the need to excavate and potentially incur root damage. It is also stated that no heavy vehicles or machinery will be used along the existing track where it is adjacent to North Bincombe Wood.
WC-072	Issue Specific Hearing (ISH3): Traffic and Transport; and Ecology and Biodiversity	Ecology and Biodiversity	Field Margins 4.39. At paragraphs 9.12 to 9.13 of Wiltshire Council's Relevant Representation [RR4934], it is specified that Section 9.9 of ES Vol 1, 6.1 Chapter 9: Ecology and Biodiversity [APP-061] details 'embedded' design measures and that under the heading of 'Construction Phase Embedded Mitigation' it is specified that buffers from field boundary habitats and other ecological features will be implemented and that buffers will not contain any array structures, hard standing or electrical hardware. It is assumed that these ecological buffers will be implemented within the CRC. However, it is stated in ES Vol 1, 6.1 Chapter 2: The Order Limits [APP-054] that within the	The reference in ES Volume 1, Chapter 3 The Scheme [APP-055] to locating cabling and fibre communication chambers at field boundaries reflects an indicative design principle intended to reduce land take and disruption to agricultural operations where practicable. In this regard it is preferable to locate chambers towards the edges of field as opposed to the centre of fields. This principle does not override or negate the embedded mitigation measures set out elsewhere within the Environmental Statement including the protection afforded to retained field boundary habitats, (such as hedgerows and

Reference	Theme	Issue	Comments	Applicant's Response
			CRC, where practicable, cable routing would be to the edge of fields to minimise impacts. This approach would fail to accord with the embedded mitigation measures put forward in APP-061, given that to undertake the works in this way would not permit the implementation of buffers from important ecological features along field boundaries. As such, it is unclear why APP-054 specified that routing cables to the edge of fields would minimise impacts; and it was queried whether this referred to impacts on agricultural land uses / arable production. Routing cables along field boundaries will likely increase the potential for ecological and arboricultural impacts due to adverse effects on sensitive field boundary habitat including hedgerows, hedgerow trees and arable field margin flora as well as the fauna that use these habitats. 4.40. In addition, paragraph 3.3.58 of ES Vol 1, 6.1 Chapter 3: The Scheme [APP 055] states: "Fibre communication	woodlands) within the Cable Route Corridor. Within the Cable Route Corridor, the ecological buffers described in ES Volume 1, Chapter 9 Ecology and Biodiversity [REP4-010] will be implemented where practicable, informed by detailed design and local site conditions. Notwithstanding this, all tree and hedgerow Root Protection Areas (RPAs) will be respected, and works will be designed to avoid encroachment into RPAs in accordance with best practice arboricultural guidance. Hedgerows, hedgerow trees and associated field boundary habitats are therefore afforded protection irrespective of the final cable alignment. Where installation of cabling and fibre communication chambers is proposed close to field boundaries, this will be subject to detailed assessment at the

Reference	Theme	Issue	Comments	Applicant's Response
			chambers will be installed typically every 500 to 750m but can be up to 2,000 m apart along the cable route. These are generally located at field boundaries. The final locations would be determined at detailed design. The excavation for this type of chamber would be approximately 1.5 m length, 1 m wide and 1.5 m deep." This further suggests that there will be works within proximity to sensitive field boundary habitats including hedgerows and trees, and that the implementation of a buffer zone at 32 these locations will not be possible contrary to the indication in ES Vol 1, 6.1 Chapter 9: Ecology and Biodiversity. 4.41. The council considers this matter will need to be suitably rectified by means of subsequent submissions from the Applicant.	construction stage to ensure that unacceptable ecological or arboricultural effects are avoided. This will be secured via the Outline EPMS [REP4-055] and Outline Arboricultural Method Statement [APP-206], which define working methods, exclusion zones and protection measures as appropriate. Such measures will ensure fibre communication chambers are sited beyond field edges where they could impact boundary habitats. Accordingly, the Applicant does not consider that installing fibre communication chambers towards field edges represents a conflict between ES Volume 1, Chapter 3 The Scheme [APP-055] and ES Volume 1, Chapter 9 Ecology and Biodiversity [REP4-010].
WC-073	Issue Specific Hearing (ISH3): Traffic and Transport; and	Ecology and Biodiversity	Existing buildings 4.42. In respect of existing buildings, Wiltshire Council has raised query regarding the approach to survey of	The Applicant notes the Council's comments on the topic of roosting bats and refers to the response provided to the Council's Relevant Representation on this

Reference	Theme	Issue	Comments	Applicant's Response
	Ecology and Biodiversity		buildings as only preliminary roost assessment (PRA) of the four buildings identified within the Solar PV Sites have been conducted and the four buildings identified within the CRC have not been subject to any survey to establish presence/ likely absence of bat roosts. On the topic of roosting bats in relation to the Solar PV Sites and the CRC, the council's Relevant Representation [RR-4934] stipulated the following: "It is evident that buildings within the Solar PV Sites were subject to inspection for roosting bats and potential roosting features (PRFs) but were not subject to further detailed surveys to establish the presence or likely absence of roosts within the buildings has been undertaken. The rationale provided is that all buildings are expected to be retained and unaffected by the Proposed Development. In the Council's statutory consultation response, it was specified that although buildings are likely to be retained within the Scheme layout, there could be indirect disturbance	matter at Reference WC-094 (pages 148 to 149) of the Applicant's Response to Relevant Representations [PDA-009]. As set out in ES Volume 1, Chapter 9 Ecology and Biodiversity [REP4-010] at the Solar PV Sites, no development is proposed within 15 metres of any of the four identified buildings with bat roost potential, with one minor exception. The exception is an access track and fence that pass approximately 10 metres east of a farm building in Field A4. This access has been designed to make use of an existing field entrance, avoiding the need to remove part of a stone wall and associated vegetation. It is the Applicant's view that this arrangement will not adversely affect any bats that may roost within the building. At a distance of 10 metres, any noise or vibration associated with occasional

Reference	Theme	Issue	Comments	Applicant's Response
			to any bats using the buildings as roost sites during the construction phase and that as such, further survey of buildings with identified PRFs would have served to inform the layout of the Scheme in terms of ascertaining where infrastructure, BESS sites, compounds and so forth should be sited to minimise the potential for impacts on bats. Wiltshire Council's statutory consultation response also specified that given that there are a large number of trees and a small number of buildings that afford potential to support roosting bats within the Order Limits, and that specific survey to ascertain the presence or likely absence of bat roosts has not taken place, it is unclear how a sound conclusion had been reached regarding the ecological value of the roosting bat assemblage which had been assessed as being of Local Importance in the PEIR. The Council indicated that the assessment had potentially undervalued roosting bats in terms of the Solar PV Sites and as further survey of the trees	vehicle use is expected to be sufficiently attenuated. Overall, retaining the existing access point is considered to have lower ecological impact than creating a new access through the existing boundary feature. Within the Cable Route Corridor, a further four buildings with bat roost potential have been identified. These buildings are all in active agricultural use and none require demolition or modification as part of the cable installation works. Consequently, no direct impacts on these buildings are anticipated. The Applicant maintains that the Scheme has been designed to avoid impacts on buildings with bat roost potential and therefore the survey scope and effort is appropriate and proportionate to the likely impacts of the Scheme. The Applicant notes that Natural England are in agreement with this

Reference	Theme	Issue	Comments	Applicant's Response
			with PRFs and buildings with bat roosting suitability was not undertaken, the precautionary principle should be applied. It is acknowledged that the roosting bat assemblage likely present within the Order Limits has been reviewed and reassessed as District Importance within the ES. The Council notes that further targeted survey of the buildings within both the Solar PV Sites and the CRC has not been undertaken in 2025. The Council would like to highlight the value this additional survey could have provided for the ES and HRA given the large scale of the Solar PV Sites and potential for adverse effects on bats." 4.43. In relation to the Habitats Regulations Assessment (HRA) and the approach to the survey of buildings to inform the HRA, the council's Relevant Representation also specified: "The Council remains concerned regarding the total lack of bat survey within the CRC,	approach, as acknowledged in the Council's comments.

Reference	Theme	Issue	Comments	Applicant's Response
			and that the buildings identified as having potential to support roosting bats within the Solar PV Sites have not been subject to further bat survey." 4.44. The current position is that the buildings identified as having potential to support roosting bats within the Solar PV Sites have still not been subject to further survey, and that buildings within the CRC have not been subject to preliminary roost assessment (PRA). 4.45. The council has raised concern in previous representations regarding the scope of bat survey undertaken to inform the ES and the HRA and to ensure the mitigation strategy put forward is adequate. As detailed in Wiltshire Council's Comments on Submissions Received at Deadline 2 [REP3-141], a review of the Statement of Common Ground with Natural England [REP2-026] and Table 2-1: Summary of engagement therein, revealed that there has been substantial engagement and	

Reference	Theme	Issue	Comments	Applicant's Response
			communication between the Applicant and Natural England (NE). It is also apparent that NE agreed the survey scope and is satisfied with the HRA. 4.46. Furthermore, Natural England's Response to the Examining Authority's first written questions [AS-018], published on 29th June 2026, has been reviewed ahead of ISH3. In respect of the ExA's question, EB1.5 Bat Surveys, NE's response specifies that "Survey scope was agreed between the applicant and Natural England at an early stage..." and that "Within the Solar PV area, trees and buildings with roost potential and associated access points and commuting habitat will be retained by development..." 4.47. It then states that "While currently no impacts are proposed on these features, if additional impacts are identified surveys should be conducted in line with best practice guidelines, i.e. Bat Surveys for	

Reference	Theme	Issue	Comments	Applicant's Response
			Professional Ecologists: Good Practice Guidelines (4th edition)." 4.48. In relation to the CRC, NE states: "Bats have been assumed present within the CRC with mitigation and avoidance measures are (sic) proposed accordingly, including those referenced within the Habitats Regulations Assessment." 4.49. As expressed by Wiltshire Council during ISH3, the Council therefore presumes that the precautionary principle has been applied and that the assumption of presence within the CRC extends to the assumption that Annex II bat species that are primary and qualifying features of the Bath and Bradford-on-Avon Bats SAC, namely greater and lesser horseshoe bats, roost within the buildings present, especially given that buildings within the CRC have not been subject to preliminary roost assessment (PRA). This specific example was articulated by Wiltshire Council during ISH3 when discussing the concerns, queries and potential limitations	

Reference	Theme	Issue	Comments	Applicant's Response
			regarding the Applicant having adopted the approach of assuming presence of species within suitable habitat in the absence of 34 dedicated Phase 2 / species-specific survey having been conducted to confirm presence /likely absence. 4.50. In response to ExA question HRA1.1 Survey Work, NE specifies that it is content that a positive assessment of the HRA can be made. Similarly, in relation to question HRA1.2 Bath and Bradford-on-Avon SAC, NE has responded as follows: "The applicant has shared a revised HRA with Natural England which reflects the above, Natural England have reviewed and agree with the conclusions set out in this report. Regarding avoidance of impacts, previous discussion between the applicant and Natural England included discussion of the inclusion of a minimum of 15m buffer zones to all hedgerows, trees, and woodland edges to avoid impacts specifically to avoid and retain the functionality these habitats	

Reference	Theme	Issue	Comments	Applicant's Response
			provide to bats. Further, retention of potential roosting habitats and associated commuting habitats was discussed and agreed." 4.51. Wiltshire Council notes that an updated HRA was submitted at Deadline 3 [REP3-091]. In terms of the discussion therein regarding loss of, or damage to greater horseshoe bat roosts, paragraph 6.5.9 states that "Four agricultural buildings have been identified within the Solar PV Sites as well as four agricultural buildings within the Cable Route Corridor,...No detailed surveys of these building for the presence/likely absence of roosting bats have been undertaken as they are all expected to be retained as part of the Scheme with no direct impacts (such as demolition or other modification) occurring. No Likely Significant Effects are anticipated through this pathway." Paragraph 6.5.22 reaches the same conclusion in respect of lesser horseshoe bats.	

Reference	Theme	Issue	Comments	Applicant's Response
			4.52. In light of NE's supportive position in respect of the extent to which buildings have been surveyed to ascertain presence /likely absence of bat roosts, and their satisfaction with the proposed avoidance and mitigation measures and conclusions of the HRA, the council will defer to NE on this matter. This is because NE constitute the relevant statutory nature conservation body (SNCB) and statutory consultees at the appropriate assessment stage of the HRA process.	
WC-074	Issue Specific Hearing (ISH3): Traffic and Transport; and Ecology and Biodiversity	Ecology and Biodiversity	Watercourses 4.53. During ISH3, Wiltshire Council offered a view on why the Applicant had likely proposed 8m wide buffers alongside watercourses rather than any other width. The council expressed that the EA used to require acquisition of a Flood Defence Consent (FDC) for works within 8m of a main watercourse. This was superseded by Environmental Permitting in 2016, and the associated requirements and thresholds for need can be found	The Applicant notes Wiltshire Council's explanation of the historic basis for the 8 m distance and its support for the Environment Agency's request for a 10 m buffer. The Scheme has not adopted 8 m solely by reference to former Flood Defence Consent requirements. It applies an ecology-led and receptor-specific approach, with a committed minimum 8 m buffer from the bank top of all ditches and watercourses, increased to 10 m where

Reference	Theme	Issue	Comments	Applicant's Response
			here: Exempt flood risk activities: environmental permits - GOV.UK 4.54. Wiltshire Council advised that as a result of the requirements for FDCs to be obtained for works within 8m, some ecologists would adopt the approach of using this same parameter as the recommended width of ecological buffer zones / exclusion zones alongside watercourses as it allows for the protection of some riparian species and their habitat, such as water vole and their burrows. 4.55. Wiltshire Council articulated during ISH3 that it was satisfied with the 10m buffer zones requested by EA.	there are signs of otter or abundant evidence of water vole, 10 m to major watercourses, and 15 m to certain minor watercourses where identified through the ecological assessment and design process. The Applicant considers that this approach provides an appropriate and proportionate baseline while allowing larger buffers to be applied where ecological sensitivity requires them. A uniform 10 m buffer to every ordinary watercourse is therefore not considered necessary, and no amendment is proposed.
WC-075	Issue Specific Hearing (ISH3): Traffic and Transport; and Ecology and Biodiversity	Ecology and Biodiversity	3.3 Approach to Species 4.56. This agenda item was not covered during ISH3 due to time constraints. 4.57. To save duplication of text, please read the comments below relating to 3.3. Approach to Species alongside Wiltshire	The Applicant's responses to the Council's comments are provided below.

Reference	Theme	Issue	Comments	Applicant's Response
			Council's response to Action Point 14 from the ExA which is presented in a separate document.	
WC-076	Issue Specific Hearing (ISH3): Traffic and Transport; and Ecology and Biodiversity	Ecology and Biodiversity	4.58. Wiltshire Council has consistently raised concern regarding the lack of Phase 2 / species-specific survey within the Cable Route Corridor (CRC), including but not limited to, bat survey within the section of the CRC that falls within the 4km greater horseshoe bat consultation zone around the Box Mine component of the Bath and Bradford-on-Avon Bats Special Area of Conservation (SAC). As set out in Wiltshire Council's Relevant Representation [RR-4934], the acquisition of more comprehensive data would be expected to augment the ecological baseline. 4.59. The council has also raised some queries regarding the scope and level of Phase 2 / species-specific survey within the Solar PV Sites. 4.60. Full details of the issues raised by the council to date are provided in	The Applicant acknowledges the Council's continued concern regarding the scope of surveys undertaken within the Cable Route Corridor. The Applicant notes the documents listed by the Councils and refers to the Applicant's responses provided to the matters relating to the scope of surveys in the following documents: • Applicant's Response to Relevant Representations [PDA-009] • Applicant's Response to the Local Impact Report [REP2-038] • Applicant's Response to Written Representations [REP2-039] • Applicant's Response to the Examining Authority's First Written Questions [REP3-128]

Reference	Theme	Issue	Comments	Applicant's Response
			Wiltshire Council's Relevant Representation [RR-4934], Wiltshire Council's Local Impact Report (LIR) [REP1-137], Wiltshire Council's Written Representation [REP1- 138], Wiltshire Council Comments on Submissions Received at Deadlines 1 and 1A [REP2-048], Wiltshire Council Comments on Submissions Received at Deadline 2 [REP3-141] and in Wiltshire Council's Response to the ExA's First Written Questions (ExQ1) [REP3-142]. It should also be noted that concerns regarding survey scope, particularly in relation to the CRC, were raised by the council in its statutory consultation response to the PEIR in March 2025 thereby allowing time prior to submission of the DCO application for matters to be addressed. 4.61. Wiltshire Council's latest submission, comprising Comments on Submissions Received at Deadline 2 provides details of outstanding matters, queries and concerns in respect	• Applicant's Response to Comments Received at Deadline 2 [REP3-129] • Statement of Common Ground with Wiltshire Council [REP4-061] • Applicant's Response to Submissions Received at Deadline 3 [REP4-082] The Applicant has consistently maintained the view that the survey scope and effort for the Cable Route Corridor is appropriate and proportion to the likelihood of significant effects occurring. The Applicant notes the survey scope for bat surveys within the Cable Route Corridor, (including where it intersects the consultation zone of the Box Mine component of the Bath and Bradford-on-Avon Bats SAC), has been agreed with Natural England as set out in the Statement of Common Ground with Natural England [REP4-064].

Reference	Theme	Issue	Comments	Applicant's Response
			of protected species and associated mitigation strategies, including in relation to great crested newts and breeding birds. 4.62. The council wishes to highlights that supporting ecological information should be appropriate for the purpose intended and sufficient in terms of species likely to be affected; it should cover a suitably wide area of study commensurate with the requirements of the species or feature of interest, including connected systems (e.g. downstream); and should be undertaken over a sufficient period of time and at an appropriate time of year to yield sufficient details of populations or habitat characteristics. This is set out in the British Standard (BS) 42020:2013 Biodiversity — Code of practice for planning and development, and also aligns with other best practice guidelines.	The Applicant agrees that, as set out in BS 42020:2013 Biodiversity – Code of practice for planning and development, ecological information should be appropriate for the ecological features potentially affected, and sufficient to inform the assessment of likely significant effects. Section 5.5 of BS 42020:2013 states that ecological surveys should be proportionate to the predicted degree of risk to biodiversity and to the nature and scale of the proposed development. Consequently, BS 42020:2013 does not direct surveys to be undertaken over the maximum conceivable area or extent in all circumstances; rather, survey scope should be informed by the likelihood of impacts occurring and the collation of information necessary to support a robust assessment. The Applicant maintains that the survey strategy adopted at the Cable Route Corridor accords with this principle. A

Reference	Theme	Issue	Comments	Applicant's Response
				lower scope and effort of surveys was undertaken at the Cable Route Corridor than at the Solar PV Sites. This was determined having regard to the temporary nature of works, the absence of permanent operational effects, and the refinement of the construction working width for cabling works and the detailed design stage to approximately 25 m (narrower at hedgerow breaches) and the reinstatement of all habitat on completion of works. The Applicant therefore maintains the information collected is proportionate to the nature of works and ecological risks associated with different elements of the Scheme, the ecological features present, the potential impact pathways, and the likelihood of significant effects occurring. Overall, the Applicant maintains the survey strategy is sufficient to inform the impact assessment and the conclusions presented within ES Volume 1, Chapter

Reference	Theme	Issue	Comments	Applicant's Response
				9: Ecology and Biodiversity [REP4-010].
WC-077	Issue Specific Hearing (ISH3): Traffic and Transport; and Ecology and Biodiversity	Ecology and Biodiversity	4.63. The provision of incomplete ecological baseline information as a result of inadequate ecological survey has implications for the robustness and accuracy of Chapter 9 of the Environmental Statement (ES) and the Habitats Regulations Assessment (HRA). Furthermore, it undermines confidence in the assessments therein as well as the avoidance, mitigation, minimisation and compensation measures proposed in respect of whether the measures are adequate and whether the principles of the mitigation hierarchy have been wholly applied. It is more difficult to adhere to the mitigation hierarchy if an ecological receptor / feature is identified at a late stage in the design process or when only minor adjustments to the proposals can be factored in and implemented on site. 4.64. The provision of incomplete ecological baseline information as a result	The Applicant does not agree that the ecological baseline is incomplete or that the assessments presented within ES Volume 1, Chapter 9 Ecology and Biodiversity [REP4-010] and the Habitats Regulations Assessment (HRA) Report [REP3-090] are not robust. The Applicant has adopted a precautionary approach throughout the assessment and design process. In particular, where suitable habitat for protected species is present and uncertainty remains, the assessment has assumed the presence of the relevant species and the avoidance and mitigation strategy has been developed on that precautionary basis. Accordingly, the ecological mitigation strategy has not been dependent upon demonstrating likely absence of protected species through survey. Instead,

Reference	Theme	Issue	Comments	Applicant's Response
			of inadequate ecological also draws into question whether further measures over and above those proposed may have been found necessary if targeted survey were conducted, as well as whether any species-specific mitigation licences may be required, where presently there has been no discussion of such need within the ES. This is notwithstanding that at Deadline 2 the Applicant provided evidence in the form of an Impact Assessment and Conservation Payment Certificate (IACPC) counter-signed by NE [REP2-041] that an application to Natural England (NE) has been approved for use of the District Level Licensing (DLL) Great crested newt (GCN) Scheme.	the Scheme has been designed to avoid or minimise impacts to suitable habitat wherever practicable, with the Outline EPMS [REP4-055] securing precautionary working methods, pre-construction checks, exclusion zones, ecological supervision and species-specific mitigation measures where required. These measures have been developed on the assumption that protected species may be present within suitable habitats and are intended to ensure compliance with the mitigation hierarchy irrespective of whether individual animals are confirmed during surveys at the detailed design stage. The Applicant therefore considers additional baseline survey information would not materially alter the impact assessment, the avoidance and mitigation strategy, or the conclusions of ES Volume 1, Chapter 9 Ecology and Biodiversity [REP4-010].

Reference	Theme	Issue	Comments	Applicant's Response
				Where additional surveys are required between the baseline surveys and commencement of works, these are secured through the Outline EPMS [REP4-055]. Such surveys are intended to identify any changes in ecological conditions prior to construction and to help refine the implementation of the secured mitigation where necessary, including through micro-siting of the final cable route alignment. Similarly, where protected species licences are required, these will be obtained in the normal manner prior to the commencement of relevant works in accordance with the established legislative process for authorising activities affecting European Protected Species or other protected fauna following the granting of development consent. As noted by the Council, the Applicant has already secured approval to use the District Level Licensing Scheme for great crested newts within the Cable Route

Reference	Theme	Issue	Comments	Applicant's Response
				Corridor through an Impact Assessment and Conservation Payment Certificate countersigned by Natural England [REP2-041]. For other species within the Natural England's remit for which licences may be required (namely bats, dormice, water voles and otters) the approach to these species has been agreed between the Applicant and Natural England as reflected in the Statement of Common Ground with Natural England [REP4-064]. The Applicant notes that the only species within Natural England's remit where the approach has yet to be agreed is in relation to impacts on badgers. The Applicant continues to engage with Natural England regarding the approach.
WC-078	Issue Specific Hearing (ISH3): Traffic and Transport; and	Ecology and Biodiversity	4.65. The overarching rationale provided by the Applicant in the DCO application documents for the lack of targeted Phase 2 survey / species-specific survey within the CRC appears to be that impacts within	The Applicant acknowledges the Council's continued concern regarding the scope of surveys undertaken within the Cable Route Corridor.

Reference	Theme	Issue	Comments	Applicant's Response
	Ecology and Biodiversity		the CRC will be restricted primarily to temporary construction related impacts. Nonetheless, the council remains concerned regarding the lack of ecological baseline data and information that has been collated for the CRC and surrounding areas and considers that the potential significance of effects upon ecological receptors and features within the CRC and the surrounding vicinity over the approximate 18-month construction period and beyond, has potentially been underestimated as a result. 4.66. In terms of the outstanding matters, queries and concerns in respect of protected species and associated mitigation strategies, the council offers the following examples.	The Applicant has consistently maintained the view that the survey scope and effort for the Cable Route Corridor is appropriate and proportion to the likelihood of significant effects occurring. A lower scope and effort of surveys was undertaken at the Cable Route Corridor than at the Solar PV Sites. This was determined having regard to the temporary nature of works, the absence of permanent operational effects, and the refinement of the construction working width for cabling works and the detailed design stage to approximately 25 m (narrower at hedgerow breaches) and the reinstatement of all habitat on completion of works. The Applicant therefore maintains the information collected is proportionate to the nature of works and ecological risks associated with different elements of the Scheme, the ecological features present, the potential impact pathways, and the likelihood of significant effects occurring.

Reference	Theme	Issue	Comments	Applicant's Response
				Overall, the Applicant maintains the survey strategy is sufficient to inform the impact assessment and the conclusions presented within ES Volume 1, Chapter 9 Ecology and Biodiversity [REP4-010] .
WC-079	Issue Specific Hearing (ISH3): Traffic and Transport; and Ecology and Biodiversity	Ecology and Biodiversity	Bats 4.67. Natural England's Response to the Examining Authority's first written questions [AS-018], published on 29th June 2026, has been reviewed ahead of ISH3. NE's responses to question EB1.5 Bat Surveys is noted and includes the statement that: "Survey scope was agreed between the applicant and Natural England at an early stage." The response also specifies that: "Given the temporary nature of impacts of habitats within the Cable Route Corridor, and the full reinstatement of habitats following construction, full activity surveys of the CRC would not be considered proportionate to the level of impact. Bats have been assumed present within the	The Applicant acknowledges the Council's continued concern regarding the scope of surveys undertaken within the Cable Route Corridor. The Applicant maintains the view that the survey scope and effort for the Cable Route Corridor is appropriate and proportion to the likelihood of significant effects occurring. The Applicant notes the scope for bat surveys within the Cable Route Corridor, (including where it intersects the consultation zone of the Box Mine component of the Bath and Bradford-on-Avon Bats SAC), has been agreed with Natural England as set out in

Reference	Theme	Issue	Comments	Applicant's Response
			CRC with mitigation and avoidance measures are proposed 37 accordingly, including those referenced within the Habitats Regulations Assessment.” 4.68. NE's responses to questions to HRA1.2 Bath and Bradford-on-Avon SAC are also noted. 4.69. As specified in its representations to date in relation to bats, Wiltshire Council would like to reiterate that it would not have expected full activity survey within the CRC and has expressed that this would be disproportionate and so are in agreement with NE on this matter. Nonetheless, as already specified in Wiltshire Council's previous representations, the council expected survey of at least the likely important / key habitats within the CRC where it coincides with the 4km greater horseshoe consultation zone around the Box Mine component of the Bath and Bradford-on-Avon Bats SAC, as such habitat would comprise functionally linked land (FLL).	the Statement of Common Ground with Natural England [REP4-064]. The Applicant maintains the view that the assessment of the Scheme's impacts on the Bath and Bradford-on-Avon Bats SAC set out within the HRA Report [REP3-090], including the conclusion of no significant adverse effects is robust. The Applicant notes Natural England is in agreement with the assessment and conclusion.

Reference	Theme	Issue	Comments	Applicant's Response
			This would have ensured the ES and HRA were informed by comprehensive survey information thereby increasing the soundness and accuracy of the assessments, and degree of certainty of their conclusions. This is particularly pertinent in respect of the HRA, whereby the appropriate assessment should reach conclusions that are beyond reasonable scientific doubt. 4.70. Furthermore, reference 3.3.7 of 8.4 Statement of Common Ground with Natural England (Rev 2) [REP3-113] submitted at Deadline 3 demonstrates that NE concurs with the council in respect of considering that the area of the CRC that coincides with the bat SAC consultation zone could comprise FLL as it states: "For the Bath and Bradford on Avon Bats SAC, Natural England agrees that the solar PV site itself is not functionally linked land for greater horseshoe bats. However, the cable route corridor lies within an impact zone and could be functionally linked, meaning likely significant effects cannot	

Reference	Theme	Issue	Comments	Applicant's Response
			be ruled out due to potential loss or fragmentation of commuting habitat. Impacts relating to loss of roosts, killing, or injury of greater horseshoe bats can be screened out."	
WC-080	Issue Specific Hearing (ISH3): Traffic and Transport; and Ecology and Biodiversity	Ecology and Biodiversity	4.71. It is the Council's view that the undertaking of targeted survey would have also served to identify any potential habitats of importance for bats earlier in the design process so that any such habitats could be safeguarded in accordance with the mitigation hierarchy. Instead, it's deemed probable that some survey, such as ground level tree assessments (GLTAs) will be needed within both the CRC and the Solar PV Sites at the detailed design stage. This could lead to the identification of tree roosts and the need for acquisition of mitigation licences causing delays and additional costs.	The Applicant notes the Council's comments. An assessment of all trees for bat roosting potential was undertaken. This identified 637 trees at the Solar PV Sites and 248 trees within the Cable Route Corridor with features capable of supporting roosting bats. None of the identified trees at the Solar PV Sites are expected to be impacted by the Scheme. Within the Cable Route Corridor, 248 trees with bat roost potential have been identified. Whilst it is recognised that some of these trees may ultimately be affected by the detailed design of the cable installation works, only a small proportion are likely to require removal, with the vast majority expected to be retained. The specific trees that may

Reference	Theme	Issue	Comments	Applicant's Response
				be affected cannot be identified until the detailed design stage. The Applicant considers that undertaking detailed bat roost surveys of all 248 trees prior to detailed design, to determine the presence or likely absence of roosting bats and whether a mitigation licence may ultimately be required, would be disproportionate to the likely impacts of the Scheme. Instead, as secured through Section 6.3 of the Outline EPMS [REP4-055], all trees identified as potentially affected by the final design will be subject to further inspection by a suitably qualified ecologist, with additional surveys undertaken where necessary to establish the presence or likely absence of roosting bats. Where impacts on a confirmed or likely bat roost cannot reasonably be avoided, including through micro-siting of the final cable route or other design refinements, the Applicant will obtain the necessary

Reference	Theme	Issue	Comments	Applicant's Response
				protected species licence prior to the commencement of works. Although this approach may result in localised programme delays and additional costs where licences are required, these risks are borne by the Applicant. The Applicant considers this to be a proportionate approach and reflects the uncertainty inherent in this linear element of the Scheme where the final construction footprint will only be determined through detailed design.
WC-081	Issue Specific Hearing (ISH3): Traffic and Transport; and Ecology and Biodiversity	Ecology and Biodiversity	4.72. The proposed avoidance and mitigation measures within the CRC where it overlaps with the Bat SAC consultation zone are recognised and acknowledged, and it is also recognised that the presence of all bat species is being assumed, including the Annex II species associated with the SAC comprising greater horseshoe bat (<i>Rhinolophus ferrumequinum</i>), Bechstein's bats (<i>Myotis bechsteinii</i>) and lesser horseshoe bat	The Applicant acknowledges the Council's continued concern regarding the scope of bat surveys undertaken within the Cable Route Corridor. The Applicant maintains the view that the survey scope and effort for the Cable Route Corridor is appropriate and proportion to the likelihood of significant effects occurring. The Applicant notes the scope for bat surveys within the Cable Route Corridor,

Reference	Theme	Issue	Comments	Applicant's Response
			(Rhinolophus hipposideros). Nonetheless, the lack of bat survey within the CRC and the greater level of information and certainty that conducting survey provides, means that the 38 council has some remaining, albeit low level, concerns regarding the potential residual cumulative impacts as a result of loss and fragmentation of foraging and commuting habitat for greater horseshoe bats within the CRC. Also, although the CRC does not intersect any Bechstein's bat consultation zones, the potential for the species to roost in suitable trees on site including within the CRC, cannot be discounted especially given the proximity of Bechstein's bat consultation zones / core areas around three core roosts to the south of Chippenham. As such, the council considers there is a low risk that currently unidentified tree roosts for Bechstein's bats exist within the Order Limits and that if any such roost were to be identified at the detailed design stage during survey to inform micro-siting of	(including where it intersects the consultation zone of the Box Mine component of the Bath and Bradford-on-Avon Bats SAC), has been agreed with Natural England as set out in the Statement of Common Ground with Natural England [REP4-064]. The Applicant maintains the view that the assessment of the Scheme's impacts on the Bath and Bradford-on-Avon Bats SAC set out within the HRA Report [REP3-090], including the conclusion of no significant adverse effects is robust. The Applicant notes Natural England is in agreement with the assessment and conclusion. As stated above, the Applicant considers that undertaking detailed bat roost surveys of all 248 trees prior to detailed design, to determine the presence of Bechstein's bats or other roosting bat species and whether a mitigation licence may ultimately be required, would be disproportionate to the likely impacts of

Reference	Theme	Issue	Comments	Applicant's Response
			works, this would likely constitute a considerable constraint and may necessitate additional mitigation and compensation beyond that already proposed, despite assumed presence, such as the re-routing or relocating of infrastructure or construction compounds to a location that is greater than the proposed 15m buffer. Moreover, it would likely prove more difficult at the detailed design / micro-siting stage to make any material changes in terms of reconfiguring the layout to avoid impacts on roosts. As such, it is possible that instead of avoiding impacts to roosts and retaining and protecting roosts, such roosts could be lost, subject to a licence being obtained from NE. This approach wouldn't adhere to the mitigation hierarchy.	the Scheme. Instead, as secured through Section 6.3 of the Outline EPMS [REP4-055], all trees identified as potentially affected by the final design will be subject to further inspection by a suitably qualified ecologist, with additional surveys undertaken where necessary to establish the presence or likely absence of bat roosts, including those used by Bechstein's bats. Should these inspections or surveys identify a bat roost within a tree that may be affected by the Scheme, all reasonable steps will be taken to avoid impacts on the tree and associated roost in accordance with the mitigation hierarchy. This will include, where practicable, micro-siting of the final cable route which is generally feasible within the typically 50 m wide Cable Route Corridor, or via adopting trenchless solutions for installation of cables which avoids impacts on trees.

Reference	Theme	Issue	Comments	Applicant's Response
				However, in any such cases where the loss or damage of a roost is unavoidable, the provision of alternative roost sites under licence would be required to maintain the favourable conservation status of the species affected and ensure full legal compliance. This will also need to document how alternatives to impacting any roosts have been fully explored. The Applicant considers this to be a proportionate approach that reflects the uncertainty inherent in this linear element of the Scheme, where the final construction footprint will only be determined through detailed design.
WC-082	Issue Specific Hearing (ISH3): Traffic and Transport; and Ecology and Biodiversity	Ecology and Biodiversity	4.73. Any Bechstein's bat roost identified within the Order Limits would also need to be considered in the HRA if deemed to be functionally linked to the SAC in the absence of evidence to the contrary in line with the precautionary principle.	The Applicant agrees with the Council's comment. The HRA Report [REP3-090], acknowledges that there is potential for Bechstein's bat roosts to be present within the Order Limits.

Reference	Theme	Issue	Comments	Applicant's Response
				However, paragraphs 8.2.21 and 8.2.22 explain how any roost that may be affected by the construction of the Scheme will be identified through the secured pre-construction survey process, allowing appropriate avoidance measures to be implemented wherever reasonably practicable. Where impacts on a confirmed roost cannot reasonably be avoided, appropriate mitigation, including the provision of replacement roosting opportunities where necessary, will be implemented in accordance with the Outline EPMS [REP4-055], and, where required, under a Natural England protected species licence. Accordingly, the Scheme secures either the avoidance of impacts on Bechstein's bat roosts or, where avoidance is not possible, appropriate licensed mitigation to ensure there is no net loss of roosting opportunities.

Reference	Theme	Issue	Comments	Applicant's Response
				The Applicant therefore considers that the mitigation secured through the Outline EPMS [REP4-055] , and the licensing process (if required) is sufficient to ensure that there will be no adverse effect on the integrity of the SAC arising from the loss of, or damage to, Bechstein's bat roosts.
WC-083	Issue Specific Hearing (ISH3): Traffic and Transport; and Ecology and Biodiversity	Ecology and Biodiversity	4.74. Nevertheless, given NE's support for the approach to bats and confidence in the conclusions of the HRA, Wiltshire Council will defer to NE on this matter. This is because NE comprises the relevant statutory nature conservation body (SNCB) and statutory consultee at the appropriate assessment stage of the HRA process and Wiltshire Council is not the determining or competent authority for this DCO.	The Applicant notes this comment.
WC-084	Issue Specific Hearing (ISH3): Traffic and Transport; and	Ecology and Biodiversity	Great crested newts 4.75. As detailed in Wiltshire Council's Written Representation [REP1-138] and Wiltshire Council's Comments on Submissions Received at Deadline 2	The Applicant does not agree that a District Level Licensing (DLL) is required for the Solar PV Sites. The Applicant acknowledges that environmental DNA (eDNA) surveys confirmed the presence of great

Reference	Theme	Issue	Comments	Applicant's Response
	Ecology and Biodiversity		[REP3- 141]; although ES Chapter 9 [APP-061] identifies that environmental DNA (eDNA) surveys confirmed the presence of great crested newt (GCN) at two ponds within Sites Lime Down C and E, as well as within a further 14 ponds located within 250 m of the Solar PV Sites, the Applicant's GCN mitigation strategy for the Solar PV Sites and the decision to not obtain a mitigation licence remains unclear and unsubstantiated in the council's view. 4.76. The council considers that the Applicant should apply to NE to use their GCN DLL Scheme for the Solar PV Sites as well as the CRC to ensure the development would be lawful. This is because despite the avoidance and mitigation measures proposed, there is a risk that newts could be killed or injured during the works, and that their habitat will be damaged or destroyed. As such, to conduct the proposed works, such as hedgerow removal, without a mitigation licence that permits derogation from the	crested newts within two ponds located within the Solar PV Sites and within a further 14 in the surrounding landscape. These survey results informed the Scheme design and the development of the avoidance and mitigation measures presented within ES Volume 1, Chapter 9 Ecology and Biodiversity [REP4-010] and the Outline EPMS [REP4-055]. For the Solar PV Sites, the Scheme has been specifically designed to avoid impacts on great crested newts and their supporting habitats wherever reasonably practicable, in accordance with the mitigation hierarchy. This includes avoiding impacts on breeding ponds, maintaining appropriate buffers (minimum 50 m) to retained ponds, retaining and protecting suitable terrestrial habitat where practicable, and implementing precautionary construction methods,

Reference	Theme	Issue	Comments	Applicant's Response
			legal protection afforded to 39 this EPS (namely the Conservation of Habitats and Species Regulations 2017 (as amended) and the Wildlife and Countryside Act 1981 (as amended), may lead to an offence being committed.	ecological supervision and pre-construction checks where required. Through these measures (secured within the Outline EPMS [REP4-055]) the Applicant considers that the risk of committing an offence under the Conservation of Habitats and Species Regulations 2017 (as amended) will be minimal. Natural England's advice contained with sections 1 and 3 of the GCN Mitigation Licence Method Statement template makes it clear that a mitigation licence should only be sought where activities cannot reasonably be undertaken without risking an offence. Where impacts can be avoided through embedded design and mitigation, obtaining a licence is neither necessary nor consistent with the application of the mitigation hierarchy. The Applicant has therefore designed the Solar PV Sites to

Reference	Theme	Issue	Comments	Applicant's Response
				avoid the need for a licence in the first instance. This approach differs from that adopted for the Cable Route Corridor, where the precise locations of construction activities cannot be fixed until detailed design and where the linear nature of the works creates greater uncertainty regarding potential interactions with great crested newts. In those circumstances, the Applicant has appropriately secured access to the District Level Licensing Scheme through an Impact Assessment and Conservation Payment Certificate countersigned by Natural England [REP2-041]. The differing approaches therefore reflect the differing nature of the potential impacts and are considered to represent a proportionate application of the mitigation hierarchy. The Applicant therefore maintains that the mitigation strategy for the Solar PV Sites

Reference	Theme	Issue	Comments	Applicant's Response
				is robust, appropriately precautionary and consistent with relevant legislation and Natural England guidance. In the absence of any requirement to derogate from the legal protection afforded to great crested newts, the Applicant does not consider that a mitigation licence is required for the Solar PV Sites.
WC-085	Issue Specific Hearing (ISH3): Traffic and Transport; and Ecology and Biodiversity	Ecology and Biodiversity	4.77. Moreover, for the reasons specified in REP1-138, it is deemed that robust evidence to demonstrate that the risk of an offence being committed is low, has not been provided. The council advised that supporting evidence could have comprised Natural England's GCN rapid risk assessment tool in the GCN Mitigation Licence Method Statement template. Although this rapid risk assessment tool can be overly simplistic, it can still serve to provide a useful guide regarding the likelihood of an offence being committed and the need for acquisition of a mitigation licence to permit legal derogation from the Conservation of	The Applicant notes this comment and refers to the detailed response to reference WC-062 (pages 121 to 125) with the Applicant's Response to Written Representations [REP2-039] on this matter, which provides further details on the Applicant's rationale regarding great crested newts at the Solar PV Sites. It remains the Applicant's view that impact avoidance and reduction measures described and secured are appropriate and sufficient for avoiding impacts on individual newts.

Reference	Theme	Issue	Comments	Applicant's Response
			Habitats and Species Regulations 2017 (as amended).	
WC-086	Issue Specific Hearing (ISH3): Traffic and Transport; and Ecology and Biodiversity	Ecology and Biodiversity	4.78. Furthermore, Natural England's Response to the Examining Authority's first written questions [AS-018], published on 29th June 2026, has been reviewed ahead of ISH3 and NE's response to question EB1.7 Great Crested Newts is noted. NE's response appears to suggest that a great crested newt (GCN) district level licensing (DLL) application has been submitted to NE for the entire Scheme. However, as specified in the council's representations to date, most recently in [REP3-141], it is the council's understanding that the GCN DLL application relates to the Cable Route Corridor (CRC) only and not to the Solar PV Sites. This is also evident from a review of the Impact Assessment and Conservation Payment Certificate (IACPC) [REP2-041] submitted to the ExA at Deadline 2, as it sets out that	The Applicant notes this comment and confirms that the Applicant only intends to register the Cable Route Corridor elements of the Scheme. No enquiry / application has been submitted for DLL covering the entire Scheme.

Reference	Theme	Issue	Comments	Applicant's Response
			the application pertains to the CRC element of the Scheme only.	
WC-087	Issue Specific Hearing (ISH3): Traffic and Transport; and Ecology and Biodiversity	Ecology and Biodiversity	4.79. As Wiltshire Council specified in paragraph 2.13. of REP1-138, for great crested newts, while presence has been confirmed within the Solar PV sites, the licensing and mitigation strategy remains unclear. The council advises that the Examining Authority should seek clarification on whether appropriate licensing will be secured and how legal compliance will be ensured in relation to the Solar PV sites. Moreover, the council suggests that it should not be overly onerous for the Applicant to apply to NE to use their GCN DLL in relation to the Solar PV Sites as well as the CRC. This would provide certainty that works would be conducted lawfully and that any necessary compensation will be delivered.	The Applicant notes this comment and refers to the detailed response to Reference WC-062 (pages 121 to 125) with the Applicant's Response to Written Representations [REP2-039] on this matter. The Applicant therefore maintains that the mitigation strategy for the Solar PV Sites is robust, appropriately precautionary and consistent with relevant legislation and Natural England guidance. In the absence of any requirement to derogate from the legal protection afforded to great crested newts, the Applicant does not consider that a mitigation licence is required for the Solar PV Sites.
WC-088	Issue Specific Hearing (ISH3): Traffic and	Ecology and Biodiversity	White-Clawed Crayfish (WCC)	The Applicant notes the Council's comment and refers to the detailed response to Reference WCD1-047 (pages

Reference	Theme	Issue	Comments	Applicant's Response
	Transport; and Ecology and Biodiversity		4.80. Natural England's Response to the Examining Authority's first written questions [AS-018], published on 29th June 2026, has been reviewed ahead of ISH3. WC welcomes and concurs with the response NE has provided to question EB1.11 White-Clawed Crayfish. 4.81. Wiltshire Council therefore maintains the stance already set out in REP2-048 that the assumption of presence shouldn't preclude proper consideration of the requirements set out in Natural England's standing advice relating to WhiteClawed Crayfish, and whether the proposed avoidance and mitigation is sufficient, as well as whether a mitigation licence could even be required to permit some works, especially in light of the three new ca. 6m wide permanent accesses for culverts proposed across 'wet' ditches at Lime Down D.	47 to 49) within the Applicant's Response to Comments Received at Deadline 2 [REP3-129] on the subject of the approach to assessment and mitigation for white-clawed crayfish. The Applicant maintains the view that the assessment with regards to white-clawed crayfish in ES Volume 1, Chapter 9 Ecology and Biodiversity [REP4-010] is robust.

Reference	Theme	Issue	Comments	Applicant's Response
WC-089	Issue Specific Hearing (ISH3): Traffic and Transport; and Ecology and Biodiversity	Ecology and Biodiversity	4.82. Given the scope of proposed works, especially at Lime Down D where suitable habitat for White-Clawed Crayfish exists, it is considered that the rationale put forward to justify the lack of any dedicated survey having been undertaken is not sufficiently robust as there could still be adverse impacts on the species, if present, despite the mitigation put forward. Also, it is possible that undertaking targeted survey may have led to the conclusion that further mitigation and compensation over and above that proposed, and possibly even a mitigation licence may be necessary to permit some of the work depending on survey results, however this is not known as survey has not been conducted and has not been discussed in the DCO application documents.	The Applicant notes the Council's comment and refers to the detailed response to Reference WCD1-047 (pages 47 to 49) within the Applicant's Response to Comments Received at Deadline 2 [REP3-129] on the subject of the approach to assessment and mitigation for white-clawed crayfish. The Applicant maintains the view that the assessment with regards to white-clawed crayfish in ES Volume 1, Chapter 9 Ecology and Biodiversity [REP4-010] is robust.
WC-090	Issue Specific Hearing (ISH3): Traffic and Transport; and	Ecology and Biodiversity	4.83. In [AS-018], it is specified that NE agrees that more detail is required to understand how the applicant intends to approach White-clawed crayfish- both lawfully and within best practice. Wiltshire	The Applicant notes the Council's comment and refers to the detailed response to Reference EB1.11 (pages 260 to 263) within the Applicant's Response to Other Parties' Responses

Reference	Theme	Issue	Comments	Applicant's Response
	Ecology and Biodiversity		Council concur with this statement and also welcome the information provided about 'class' licences in NE's response to the ExA question relating to White-Clawed Crayfish.	to Examining Authority's First Written Questions [REP4-081] on the subject of the approach to assessment and mitigation for white-clawed crayfish. It remains the Applicant's view that the assessment of potential effects on this species and the identification of appropriate avoidance and mitigation measures are robust and in accordance with the Natural England standing advice.
WC-091	Issue Specific Hearing (ISH3): Traffic and Transport; and Ecology and Biodiversity	Ecology and Biodiversity	Otter and Water Vole 4.84. In Wiltshire Council's Relevant Representation [RR-4934], it was highlighted that a suitably robust rationale for otter and water vole surveys not having been undertaken within the CRC, had not been provided.	The Applicant notes the Council's comment and refers to the detailed response to Reference WC-097 (page 152) within the Applicant's Response to Relevant Representations [PDA-009] on the subject of the approach to otter and water vole surveys within the Cable Route Corridor. It remains the Applicant's view that the assessment of impacts on these species presented in ES Volume 1, Chapter 9 Ecology and Biodiversity [REP4-

Reference	Theme	Issue	Comments	Applicant's Response
				010] , including the conclusion of no significant residual effects, is robust.
WC-092	Issue Specific Hearing (ISH3): Traffic and Transport; and Ecology and Biodiversity	Ecology and Biodiversity	Breeding Birds 4.85. Wiltshire Council's Relevant Representation [RR-4934]; specified at paragraph 9.66 in regard to the Solar PV Sites, that given the evidence of barn owl possibly breeding and the presence of suitable buildings and / or mature trees with cavities present, the council would have expected species-specific survey for this Schedule 1 species to have at least been carried out at the buildings within the Solar PV Sites. This remains outstanding as far as the council is aware.	The Applicant notes the Council's comment and refers to the detailed response to Reference WC-102 (page 157 to 159) within the Applicant's Response to Relevant Representations [PDA-009] the subject of the approach to barn owls. The Applicant notes that further inspection of buildings and / or trees at the Solar PV Sites will be undertaken where potential impacts on species within (including barn owls) are identified at the detailed design stage, as secured within Section 6.3 of the Outline EPMS [REP4-055]. Detailed surveys of these features for barn owls at the Solar PV Sites have not been undertaken on the basis that they are expected to be retained and unimpacted.

Reference	Theme	Issue	Comments	Applicant's Response
				It remains the Applicant's view that the assessment of potential effects on this species and the identification of appropriate avoidance and mitigation measures presented in ES Volume 1, Chapter 9 Ecology and Biodiversity [REP4-010] is robust.
WC-093	Issue Specific Hearing (ISH3): Traffic and Transport; and Ecology and Biodiversity	Ecology and Biodiversity	4.86. Paragraph 9.67 of the Relevant Representation highlighted that APP-198 specifies that the Solar PV Sites as a whole offer suitable habitat for a variety of breeding birds but that no breeding bird surveys have been undertaken within the CRC. The rationale put forward is that "Habitats within the Cable Route Corridor are anticipated to be predominantly retained, with any temporary removal of habitat for access and cable installation works expected to be reinstated following a relatively short construction period. As such, undertaking specific breeding bird surveys was not considered proportionate or necessary."	The Applicant notes the Council's comment and refers to the detailed response to Reference WC-102 (page 157 to 159) within the Applicant's Response to Relevant Representations [PDA-009] the subject of the approach to breeding birds within the Cable Route Corridor.

Reference	Theme	Issue	Comments	Applicant's Response
WC-094	Issue Specific Hearing (ISH3): Traffic and Transport; and Ecology and Biodiversity	Ecology and Biodiversity	4.87. At paragraph 9.68, of the Relevant Representation, the council stated that given the extent of the CRC, the construction duration and construction methods to be employed, together with the deployment of temporary construction compounds throughout the CRC and the fact that the construction footprint will be up to approximately 665m wide at some locations along the route, in order to be suitably precautionary and to ensure the collation of adequately comprehensive and robust ecological baseline data, the council would have expected breeding bird survey to have at least been undertaken at likely key habitats within the CRC. The justification for the lack of survey within the CRC appears to be predicated on the temporary nature of construction phase related impacts. However, this does not fully recognise the potential for disturbance and displacement of birds during the breeding season.	The Applicant notes the Council's comment and refers to the detailed response to Reference WC-102 (page 157 to 159) within the Applicant's Response to Relevant Representations [PDA-009] the subject of the approach to breeding birds within the Cable Route Corridor. It remains the Applicant's view that a suitably precautionary approach to the evaluation of the breeding bird assemblage within the Order Limits has been made and presented in ES Volume 1, Chapter 9 Ecology and Biodiversity [REP4-010].

Reference	Theme	Issue	Comments	Applicant's Response
WC-095	Issue Specific Hearing (ISH3): Traffic and Transport; and Ecology and Biodiversity	Ecology and Biodiversity	4.88. As set out in Wiltshire Council's previously submitted representations, including the Relevant Representation, which has been transposed into 8.2 Statement of Common Ground with Wiltshire Council [REP2-025], the Council highlighted that the ES proposes creating diverse grassland under and between solar panels to mitigate displacement of ground-nesting birds (skylark and yellow wagtail). However, the Council has consistently advised (first in its statutory consultation response to the PEIR), that it should be assumed that only modified grassland of poor condition can be achieved underneath and between the solar panels. The need to assume only modified grassland can be achieved under and between the solar panels is correctly recognised in the Biodiversity Net Gain Assessment Report and so it is unclear why there hasn't been consistency of approach within ES Volume 1, Chapter 9: Ecology and Biodiversity. The Council raised concern that assumption of delivery	The Applicant notes Wiltshire Council's continued concern regarding the consideration of grassland likely to establish under and between panels with respect to benefits expected for ground nesting birds. The Applicant has addressed these points previously, most recently in the Applicant's Response to Submissions Received at Deadline 3 [REP4-082]. A response to Reference WC-076 (pages 149 to 150) is provided with respect to the consistency of description of grassland expected to be established under and between panels. In additions, a response to Reference WC-083 (pages 163 to 165) is provided with respect to the Applicant's conclusion of the likely improvement in foraging resources available to skylarks during the Operation and Maintenance Phase of the Scheme.

Reference	Theme	Issue	Comments	Applicant's Response
			of the additional mitigation for breeding birds proposed in Paragraphs 9.12.31 - 9.12.32 will have skewed the impact assessment, conferring greater assumed benefits than will likely be delivered on the ground. This undermines confidence in the purported additional mitigation for breeding birds. The requirements to be fulfilled when relying on the Rochdale Envelope approach to assessment should also be recognised in this context.	It remains the Applicant's view that the assessment of potential effects on this ground nesting birds and the identification of appropriate mitigation measures presented in ES Volume 1, Chapter 9 Ecology and Biodiversity [REP4-010] is robust
WC-096	Issue Specific Hearing (ISH3): Traffic and Transport; and Ecology and Biodiversity	Ecology and Biodiversity	4.89. In addition, the Council raised concerns in its Written Representation [REP1- 138}, regarding the statement in the above extract of Chapter 9 of the ES that the impact of displacement of skylark and yellow wagtail, will be reduced by the provision of foraging habitat within the Solar PV Sites have been detailed in the Council's Written Representation. In summary, the Council considers that the substantive displacement of these ground nesting bird species, which will occur as a result of the Scheme, will not be wholly mitigated or offset by the provision of	The Applicant agrees with the Council's view that the proposed mitigation measures for ground nesting birds will not fully mitigate or compensate impacts. A significant adverse residual effect on this species group is acknowledged and transparently reported in ES Volume 1, Chapter 9 Ecology and Biodiversity [REP4-010] .

Reference	Theme	Issue	Comments	Applicant's Response
			foraging habitat. Displaced birds will still require adequate suitable open areas for ground nesting, and the provision of foraging habitat does not comprise like-for-like compensation for the loss of significant areas of nesting habitat.	
WC-097	Issue Specific Hearing (ISH3): Traffic and Transport; and Ecology and Biodiversity	Ecology and Biodiversity	4.90. Furthermore, in Wiltshire Council's Response to the ExA's First Written Questions (ExQ1) [REP3-142], the potential for adverse impacts on ground nesting birds as a result of the Applicants intended approach of maintaining all hedgerows across the Order Limits at a height of 4.5m above ground level (AGL) was discussed. The Council specified: "Management of hedgerows to a height of 4.5m, especially newly planted hedgerows, within ecology mitigation areas such as those for ground nesting birds, including skylark and yellow wagtail, could in effect obstruct and 'close' currently open views needed by such species, and may increase predation due	The Applicant notes the Council's comment and refers to the detailed response to Reference EB1.18 (pages 89 to 94) within the Applicant's Response to Other Parties' Responses to Examining Authority's First Written Questions [REP4-081] on this matter. It is the Applicant's view that no significant adverse effects on biodiversity are anticipated as a result of maintaining hedgerows at the Solar PV Sites to a height of 4.5m.

Reference	Theme	Issue	Comments	Applicant's Response
			to an increase in elevated vantage points and perch sites for raptors."	
WC-098	Issue Specific Hearing (ISH3): Traffic and Transport; and Ecology and Biodiversity	Ecology and Biodiversity	3.4 Monitoring 4.91. As specified in Wiltshire Council Response to ExA's First Written Questions (ExQ1) [REP3-142], the council confirms that with respect to discussions regarding habitat and species monitoring during both the construction and operation / replacement and decommissioning, the Applicant had been silent and not engaged with the council in any discussions on this matter. However, shortly before the ISH, the Council had been in communication with the Applicant with a view to arranging a meeting between respective legal teams to discuss this matter. An initial meeting took place on 8 July 2026.	The Applicant notes this comment.

Reference	Theme	Issue	Comments	Applicant's Response
WC-099	Issue Specific Hearing (ISH3): Traffic and Transport; and Ecology and Biodiversity	Ecology and Biodiversity	4.92. The council's preference would be for an appropriate contribution to be agreed and secured by means of legal agreement, namely section 106 agreement. Given that the monitoring will need to be conducted over the lifetime of the Scheme, i.e. 60 years, the monitoring contribution needs to be index linked. Discussions are ongoing.	The Applicant has confirmed that it will cover the Council's costs in relation to monitoring, and has been in discussions with the Council regarding the most appropriate mechanism for securing the approach to covering those costs. Wiltshire Council and the Applicant have now agreed that this will be through a section 106 agreement and post-consent PPA, the terms of which are in the process of being negotiated.
WC-100	Issue Specific Hearing (ISH3): Traffic and Transport; and Ecology and Biodiversity	Ecology and Biodiversity	3.5 Biodiversity Net Gain (BNG) 4.93. This agenda item was only briefed discussed during ISH3 due to time constraints. The discussion focused on Observation 1 taken from Wiltshire Council's Written Representation [REP1-138] and it was agreed that a suitable response to this observation had in effect, been provided by the Applicant. 4.94. The ExA requested that Wiltshire Council and the Applicant liaise in respect of the remaining observations made by	The Applicant welcomes the Council's comment regarding Observation 1. The Applicant has provided a response to each comment on the remaining observations in turn below.

Reference	Theme	Issue	Comments	Applicant's Response
			the Council in the Written Representation by means of the SoCG between the parties. Both parties agreed to this course of action. 4.95. Nonetheless, the Council offers the following comments to assist the ExA.	
WC-101	Issue Specific Hearing (ISH3): Traffic and Transport; and Ecology and Biodiversity	Ecology and Biodiversity	4.96. Wiltshire Council recognises that DEFRA will implement a mandatory BNG framework for NSIPs from November 2026. Nevertheless, the Applicant has committed to providing at least 10% BNG for the Lime Down Solar Park project and Core Policy 50 of the Wiltshire Core Strategy (adopted January 2015) requires major development to deliver biodiversity gains. Policy NE2 of the Chippenham Without Neighbourhood Plan 2022 - 2036 requires development (where appropriate) to deliver BNG and Policy GI1 of the Chippenham Neighbourhood Plan (2024) requires major development to demonstrate at least 10% BNG will be attainable. Similarly, Policy 13 of the Joint Melksham	The Applicant notes this comment.

Reference	Theme	Issue	Comments	Applicant's Response
			Neighbourhood Plan 2 (2025) requires all development to deliver at least 10% BNG and makes particular reference to this requirement extending to solar farms. It is, however, accepted that only part of the application site is covered by the respective community neighbourhood plans outlined above.	
WC-102	Issue Specific Hearing (ISH3): Traffic and Transport; and Ecology and Biodiversity	Ecology and Biodiversity	4.97. Furthermore, it is assumed that the Applicant has used the on-site post intervention projections presented in the metric to substantiate, quantify and evidence the habitat mitigation, enhancement and creation proposals discussed and relied upon in the DCO application. Therefore, the council has provided comment on the Applicant's approach to BNG and the associated submissions within its previous representations.	The Applicant notes this comment.
WC-103	Issue Specific Hearing (ISH3): Traffic and Transport; and	Ecology and Biodiversity	4.98. Wiltshire Council's Written Representation [REP1-138] covered the Applicant's approach to BNG and the BNG submissions and provided detailed	Please see the Applicant's response to each comment below.

Reference	Theme	Issue	Comments	Applicant's Response
	Ecology and Biodiversity		comment on eleven key issues. The most important issues raised in the Written Representation, and which remain inadequately addressed and / or justified to date are summarised below. Please note that the observations presented below do not encompass of the observations made in the aforementioned representation as it was considered unnecessary to duplicate them in full herein. Rather, those observations included below are intended to give an overview of the key issues. Please note that the observation numbers remain the same as those assigned in the Written Representation for purposes of continuity and ease of cross-referencing.	
WC-104	Issue Specific Hearing (ISH3): Traffic and Transport; and Ecology and Biodiversity	Ecology and Biodiversity	Observation 2 4.99. Habitat reference numbers have not been provided in the Irreplaceable Habitats, A-1 On-Site Habitat Baseline, A-2 On-Site Habitat Creation, A-3 On Site Habitat Enhancement, B-1 On-Site Hedge Baseline, B-2 On-Site Hedge Creation, B-	The Applicant acknowledges that Habitat Reference numbers provide a useful tool with which the Statutory Biodiversity Metric [REP4-047] could be compared to associated baseline and proposed habitat mapping, and the content of

Reference	Theme	Issue	Comments	Applicant's Response
			3 On-Site Hedge Enhancement, C-1 On-Site Watercourse Baseline, C-2 On-Site Watercourse Creation and C-3 On-Site Watercourse Enhancement tabs of the submitted BNG Metric [PDA-008]. 4.100. The use of habitat reference numbers allows for the labelling of a habitat in the metric, so that it can be matched up with associated mapping provided. Essentially, users should reference habitat parcels by unique codes on all applicable sheets in the metric. The inclusion of habitat reference numbers enables the reviewer to cross reference between the pre-intervention / baseline calculations in the metric and associated baseline / habitat plans, and between the post-intervention calculations in the metric and the post development plans so it can be verified that the metric and associated plans align and are correct.	the Biodiversity Net Gain (BNG) Assessment Report [REP4-045]. Owing to the sheer number of individual habitat parcels (2,229 for Habitat Units alone), the data were consolidated within the Statutory Biodiversity Metric [REP4-047], in accordance with the Statutory Biodiversity Metric QGIS Template and GIS Import Tool – User Guide. Consolidation of data is recognised as a limitation to the assessment, however, in the Applicant's view, sufficient justification for this decision has been provided. It should be noted that un-consolidated habitat data would not fit within a single Metric. The Applicant notes that a GIS dataset containing all mapped pre-development and post-developed habitats, hedgerows and watercourses which have underpinned the Statutory Biodiversity Metric [REP4-047] and the BNG Assessment Report [REP4-045] was

Reference	Theme	Issue	Comments	Applicant's Response
				submitted to Wiltshire Council on 18 June 2026 to aid verification and corroboration.
WC-105	Issue Specific Hearing (ISH3): Traffic and Transport; and Ecology and Biodiversity	Ecology and Biodiversity	4.101. Whilst the inclusion of Habitat Baseline Plans (Plates 3 – 7) and the Proposed Habitats Plans (Plates 8 – 12) are helpful and have been used by the council's Ecology Officer during the review process, because they do not include habitat reference numbers, it proved very difficult to ascertain exactly what is being proposed and where with sufficient degree of certainty.	See above.
WC-106	Issue Specific Hearing (ISH3): Traffic and Transport; and Ecology and Biodiversity	Ecology and Biodiversity	4.102. In terms of the methodology applied, the BNG Assessment Report details a number of limitations but does not explicitly mention or discuss the omission of habitat reference numbers within the metric. A justification appears to be presented in paragraph 1.2.8 [APP-273] however, and states: "The number of rows generated by the overlay of baseline and proposed habitats once mapped using QGIS approached 2,229 in the case of HU,	As set out within the BNG Assessment Report [REP4-045] , the BNG assessment has been calculated based on the Order Limits in order to reflect the total net change in biodiversity units across the Scheme. The Statutory Biodiversity Metric [REP4-047] includes baseline and proposed habitats within the Solar PV Sites and Cable Route Corridor (CRC).

Reference	Theme	Issue	Comments	Applicant's Response
			1,377 for HeU, and 138 for WU. As per the Statutory Metric QGIS template and GIS import tool User Guide (Ref 16), data have been consolidated into groups of identical values (i.e. multiple polygons with identical baseline values proposed to have identical outcomes) for simpler representation within the Metric. If requested, the raw data can be provided in full." 4.103. Whilst this limitation and the number of rows generated is acknowledged, it is considered that the size of the Scheme should not prohibit the preparation of comprehensive and appropriately marked-up plans, BNG Assessment and metric; nor should it hinder the undertaking of a sound and thorough review of the BNG proposals, particularly by the ExA and host authority. As such, the explanation in the report is not deemed to comprise a suitably robust rationale for the omission of the habitat reference numbers.	Within the BNG Assessment Report [REP4-045], the headline results were provided from Metric calculations completed for the Solar PV Sites only alongside the assessment of the Order Limits to illustrate that the bulk of habitat creation and enhancement measures are proposed within the Solar PV Sites. This inclusion was intended as a useful indicative reference, to provide context as to the extent and proportion of net gains proposed in different elements of the Scheme. The individual calculations for the Solar PV Sites have not been submitted as part of the Development Consent Order (DCO) application, as the BNG proposals submitted relate to the Scheme as a whole. Justification for the consolidation of habitat rows within the Statutory Biodiversity Metric [REP4-047] and subsequent omission of

Reference	Theme	Issue	Comments	Applicant's Response
			4.104. The ExA is therefore advised that in the absence of habitat reference numbers accurately linking to appropriately marked up baseline / pre-intervention and post development plans, the council's Ecology Officer cannot verify or corroborate the metric and BNG Assessment Report, despite the provision of the plates in the BNG Assessment Report. Instead, it was necessary to look at the plans at a higher level than is ideal and to make judgements. This is pertinent because even though mandatory BNG has not yet come into force for NSIPs, the metric effectively underpins the ecological impact assessment as it quantifies biodiversity losses and gains. Moreover, the BNG Assessment and metric have effectively been used to evidence and support the habitat mitigation, creation and enhancement proposals put forward in ES Chapter 9, the HRA and the other ecological documents and plans submitted as part of the DCO application.	individual habitat parcel references is provided in the relevant response above. The Applicant confirms that all hedgerows to be temporarily removed within the CRC have been treated as lost, followed by creation on reinstatement as set out in paragraph 1.8.2 of the BNG Assessment Report [REP4-045]. The Applicant notes that a GIS dataset containing all mapped pre-development and post-developed habitats, hedgerows and watercourses which have underpinned the Statutory Biodiversity Metric [REP4-047] and the BNG Assessment Report [REP4-045] was submitted to Wiltshire Council on 18 June 2026 to aid verification and corroboration.

Reference	Theme	Issue	Comments	Applicant's Response
WC-107	Issue Specific Hearing (ISH3): Traffic and Transport; and Ecology and Biodiversity	Ecology and Biodiversity	Observation 4 4.105. Condition assessment sheets have not been provided for the habitats assigned a condition in the submitted BNG metric and condition assessment information has likewise been omitted from the BNG Assessment Report. Paragraph 1.2.9 of the BNG Assessment Report [APP-273] provides the following explanation: "Condition assessment information for each individual habitat parcel recorded has not been presented in this document, given the number of parcels recorded, as detailed above. Instead, summaries of the overall condition scores for each habitat, hedgerow, and watercourse type are provided in Tables 2 and 3." 4.106. The omission of condition assessment sheets alongside the metric and condition assessment information in the BNG Assessment Report constitutes a deviation from The Statutory Biodiversity Metric User Guide (Last updated: 3 July	Figures showing the baseline and proposed habitats are provided in Plates 3 - 24 at the end of the BNG Assessment Report [REP4-045]. Given the sheer number of area and linear habitat parcels present across the Scheme, it was not considered proportionate to provide each condition assessment individually for submission. However, a summary of the condition assessment scores for each specific habitat, hedgerow and watercourse type is provided in Tables 2 and 3 in the BNG Assessment Report [REP4-045]. An Applicant's Response to EB2.12 - Biodiversity Net Gain & Additionality Technical Note [EN010168/EXAM/9.67] has also been prepared and will be submitted at Deadline 5. The Applicant acknowledges that this approach deviates from the guidance set out within The Statutory Biodiversity Metric User Guide (Feb 2024; updated

Reference	Theme	Issue	Comments	Applicant's Response
			2025) (hereafter referred to as 'the User Guide') which states: "You should conduct a condition assessment for all habitat parcels which require you to assign a condition to them in the biodiversity metric tool. You should use the biodiversity metric condition sheets to do this and provide these as evidence to support your assessment. Biodiversity metric condition sheets can be used to evidence good, moderate or poor condition. Fairly good and fairly poor are intermediate condition categories. If you need to use these, you should: • complete a biodiversity metric condition assessment sheet • make site specific judgements using ecological expertise • explain any deviations against specific condition criterion • provide ecological reasoning"	July 2026). This decision was based on professional judgement, consideration of the scale of the Scheme, and recognition that a BNG assessment has been provided alongside the Development Consent Order (DCO) application beyond what is statutorily required of NSIP developments.

Reference	Theme	Issue	Comments	Applicant's Response
			4.107. Whilst paragraph 1.2.9 of the BNG Assessment Report attempts to justify the omission, the provided rationale is not augmented by the provision of a citation to demonstrate where in guidance this deviation has been advocated for certain circumstances. Furthermore, the ExA is advised that the absence of condition assessment information has meant that the council's Ecology Officer has not been able to verify the condition of the habitats.	
WC-108	Issue Specific Hearing (ISH3): Traffic and Transport; and Ecology and Biodiversity	Ecology and Biodiversity	Observation 6 4.108. In terms of the Minimum Mapping Units (MMU) used for the BNG Assessment, paragraph 1.2.11 of the BNG Assessment Report [APP-273] states: "Given the extent of the Solar PV Sites, the following Minimum Mappable Units (MMU) for UKHab classification were generally set at: • Area features (HU) – 400 m² (20 m x 20 m); and • Linear features (HeU and WU) – 20 m." 4.109.Paragraph 1.2.12 of the BNG Assessment presents a justification for	The Minimum Mappable Units (MMU) for baseline UK Habitat Classification surveys across the Scheme was determined based on guidance presented in Section 2.2 of the UK Habitat Classification User Manual Version 1.0 (May 2018), published by the UK Habitat Classification Working Group. Section 2.2 of UK Habitat Classification User Manual Version 1.0 states the following:

Reference	Theme	Issue	Comments	Applicant's Response
			this approach and the adoption of these MMU as follows: "It should therefore be noted that some habitat parcels or features below the above MMU thresholds were not individually mapped and included within the BNG calculations. This approach is in line with UKHab guidance and is considered proportionate to the size of the Scheme. An exception to this general rule was made for ponds, as all ponds were individually mapped regardless of area." 4.110. The council has concerns about the large MMU applied and the potential for inaccuracies and the increased risk of significant errors as a result of adopting this approach to mapping the habitats. This is because using a large MMU for area features and linear features can result in smaller areas of high-value habitat being overlooked or subsumed into a lower-value category, resulting in a lower baseline score. This makes achieving the 10% BNG target easier but can fail to reflect the actual ecological	<i>"The UKHab has been designed to function at two scales:</i> <i>If a project requires the detailed mapping of small features and where habitats could be very fine grained, it is recommended that surveyors use the fine-scale minimum mapping unit MMU (25m2, 5m length). The fine scale MMU may be used for urban or small-scale rural development projects, detailed surveys of designated sites and where subtle habitat differences are considered important for the survey scope.</i> <i>If a project is to undertake surveys on a landscape scale or is only collecting data at broader scales, e.g. Level 3 – Broad Habitats, the large scale MMU (400m2 polygon and 20m length) is likely to be more appropriate. For some unenclosed upland areas, a larger MMU of 2500m2 may be selected to reduce the number of surveyor days in the field."</i> Whilst it is recognised by the Applicant that UK Habitat Classification User

Reference	Theme	Issue	Comments	Applicant's Response
			baseline and can reduce the accuracy of the metric calculation. 4.111. Therefore, the council cannot corroborate the supposition put forward in paragraph 1.2.10 of the BNG Assessment Report which states: "It is anticipated that a non-significant margin of error may occur throughout the mapping process, from collecting data in the field to mapping using QGIS software." 4.112. Furthermore, paragraph 1.2.12 of the BNG Assessment Report states that the approach adopted for the MMU is in line with UKHab guidance. However, an exact citation for the UKHab guidance which advocates the adopted approach has not been provided in paragraph 1.2.12, and the 'References' section of the report also appears to omit the UKHab Classification document or any other UKHab reference. This is pertinent as contrary to what is stipulated in the BNG Assessment Report, it is understood that the 400m² MMU	Manual Version 2.0 (2023) supersedes Version 1.0 (2018), Version 2.0 does not provide specific guidance on the recommended size of the Minimum Mappable Unit (MMU). In the absence of updated MMU guidance from UKHab Ltd., the Applicant considered it appropriate to apply the most recent published guidance relating specifically to MMU size, taking account of site size and scheme context, as set out in the response to WC-069 on pages 146–150 of The Applicant's Response to Written Representation [REP2-039]. The Applicant is not aware of any alternative published guidance from UKHab Ltd. or other relevant professional bodies that provides updated or equivalent guidance on MMU size for UKHab surveys. Consequently, the Applicant considers that reliance on the most recent published MMU-specific guidance represents the most appropriate and robust basis for

Reference	Theme	Issue	Comments	Applicant's Response
			approach that has been applied for Lime Down Solar Park is not actually cited or recommended in the UKHab definitions or any other UKHab guidance, and neither is it discussed in the User Guide. Rather, it is understood to be an approach that has been adopted by practitioners on specific projects entailing landscape-scale surveys and for large-scale upland sites or extensive, uniform farmland sites. 4.113. Therefore, a robust and comprehensive rationale is required to justify the large MMUs used. Whilst paragraphs 1.2.11 and 1.2.12 [APP-273] refer to the extent and size of the Solar PV Sites, there is no discussion regarding the habitats across the Solar PV Sites and whether they are considered sufficiently homogeneous to warrant the approach to MMU adopted. The council therefore suggests that the ExA investigates this matter further and seeks further evidence of where this approach is supported in published guidance, and not just evidence of where	ensuring consistency of habitat mapping across the Scheme.

Reference	Theme	Issue	Comments	Applicant's Response
			this approach has been applied on other projects given that latter in itself does not render the approach to be in line with published standards and guidance.	
WC-109	Issue Specific Hearing (ISH3): Traffic and Transport; and Ecology and Biodiversity	Ecology and Biodiversity	Observation 7 4.114.Paragraph 1.2.11 of the BNG Assessment Report [APP-273] only refers to use of the discussed MMU in respect of the Solar PV Sites and no methodology is provided in relation to the CRC. It is assumed therefore that the stated MMU has also been applied to the CRC. It is considered that this information and supporting justification for the approach should have been provided within the 'Methodology'. This is considered especially necessary as the proposed CRC is much narrower along the majority of its route than the Solar PV Sites and so using large MMU is likely inappropriate for the CRC. There is a need for the adopted MMU to be applied consistently across the Order Limits given that the metric has been used for the CRC. Nonetheless, as	The Applicant can confirm that the Minimum Mappable Unit of 400m2 for area-based habitats and 20m for linear features applied across the Solar PV Sites was also applied within the Cable Route Corridor to ensure consistency across the Scheme. Justification for the use of the defined MMU is provided in the relevant response to Observation 6 above, and it is the Applicant's view that the MMU applied, and habitat data collected, within both the Solar PV Sites and CRC reflect the baseline ecological conditions in sufficient detail to support a robust assessment.

Reference	Theme	Issue	Comments	Applicant's Response
			discussed above, the council has concerns regarding the use of the stated MMU for the Solar PV Sites and so these concerns would likewise apply to the CRC in any case. It is recommended that the ExA seeks further information and supporting evidence and justification in respect of this matter.	
WC-110	Issue Specific Hearing (ISH3): Traffic and Transport; and Ecology and Biodiversity	Ecology and Biodiversity	Observation 8 4.115. The Irreplaceable Habitats tab of the BNG metric [PDA-008] has listed individual rural trees comprising veteran trees all in one row, effectively grouping them all together. This doesn't comply with the User Guide which requires one row per tree. In the User Guide under the heading 'Recording irreplaceable habitats', in respect of ancient and veteran trees it stipulates: "You should record all ancient and veteran trees as individual trees separately on a single data entry row and mark these as an irreplaceable habitat. This includes ancient and veteran trees in woodlands that are not	The Applicant acknowledges that all individual trees comprising Irreplaceable Habitat have been grouped within a single row within the Statutory Biodiversity Metric [REP4-047]. These features were consolidated within the Metric, as with other habitat elements within the Scheme. The Applicant has reviewed the data and can confirm that 50 ancient and veteran trees recorded within the Solar PV Sites and Cable Route Corridor (CRC) and listed within the Irreplaceable Habitats tab of the Statutory Biodiversity Metric [REP4-047] comprised the following individual trees:

Reference	Theme	Issue	Comments	Applicant's Response
			themselves ancient woodlands and those in hedgerows and lines of trees.” 4.116.Paragraph 1.3.6 of the BNG Assessment Report [APP-273] specifies: “42 ancient and veteran trees were recorded within the Solar PV Sites.” Paragraph 1.3.7 states: “A total of 10 ancient and veteran trees were recorded within the Cable Route Corridor and have therefore been categorised as Irreplaceable Habitat within the Metric.” 4.117.Each of the 52 ancient and veteran trees recorded within the Solar PV Sites and CRC should have been listed in a separate row in the Irreplaceable Habitats tab of the metric in line with the User Guide. There is no explanation in the ‘user comments’ column in the metric to justify why the trees have been grouped together in one row and no explanation has been provided within paragraphs 1.3.6-1.3.7 or the Limitations section of the BNG Assessment Report. The number of ancient and veteran trees	Solar PV Sites: • 2 medium trees in ‘Good’ condition (0.0326ha); • 12 large trees in ‘Good’ condition (0.4397ha); and • 27 very large trees in ‘Good’ condition (2.0643ha). CRC: • 5 large trees in ‘Good’ condition (0.1832ha); and • 4 very large trees in ‘Good’ condition (0.3058ha). The total of area of 3.02 ha comprises a sum of the above area measurements, derived from the ‘Tree Helper’ within the Metric. The Applicant notes that a GIS dataset containing all mapped pre-development and post-developed habitats, hedgerows and watercourses which have underpinned the Statutory Biodiversity

Reference	Theme	Issue	Comments	Applicant's Response
			recorded isn't so large that it warrants deviation from the User Guide. 4.118. It is also not apparent how the veteran tree total area at baseline of 3.10 hectares has been derived given that all these trees have been grouped together and the Tree Helper tool on the Main Menu tab of the metric has not been completed, as would have been expected. The council recommends that the ExA request these matters be addressed and for clarity and information, the User Guide states: "For individual trees, the biodiversity metric tool contains a 'tree helper' which generates an area value based on the tree's diameter at breast height (DBH)."	Metric [REP4-047] and the BNG Assessment Report [REP4-045] was submitted to Wiltshire Council on 18 June 2026 to aid verification and corroboration.
WC-111	Issue Specific Hearing (ISH3): Traffic and Transport; and Ecology and Biodiversity	Ecology and Biodiversity	4.119. Wiltshire Council Comments on Submissions Received at Deadlines 1 and 1A [REP2-048] entailed comment on updated BNG submissions comprising 7.8 Biodiversity Net Gain Assessment Report (Rev 2) [REP1-090] and Biodiversity Net Gain Assessment Appendix Statutory	The Applicant notes the documents referred to by the Council and refers in turn to the Applicant's responses provided to the comments relating to BNG matters in the following documents:

Reference	Theme	Issue	Comments	Applicant's Response
			Biodiversity Metric [REP1-092 and REP1-093], and specified that a number of the issues raised in Wiltshire Council's Written Representation [REP1-138] remained outstanding and had not been addressed as a result of the aforementioned submissions. 4.120. Most recently, Wiltshire Council Comments on Submissions Received at Deadline 2 [REP3-141] encompassed commentary on The Applicant's Response to Written Representations [REP2-039], including counter responses to the Applicant's responses against References WC-063 to WC-074 inclusive pertaining to BNG. Although the Applicant has attempted to justify the approach applied, a number of important issues remain unaddressed and deviations from UK Habitat Classification Version 2.0 (UKHab Ltd., July 2023) and The Statutory Biodiversity Metric User Guide (Last updated: 3 July 2025) remain	• Applicant's Response to Written Representations [REP2-039] • Applicant's Response to Comments Received at Deadline 2 [REP3-129] • Applicant's Response to Submissions Received at Deadline 3 [REP4-082] The Applicant has provided a response to each detailed comment in turn below.

Reference	Theme	Issue	Comments	Applicant's Response
			unsubstantiated and a cause for concern. 4.121. The sections of Wiltshire Council's comments from REP3-141 on The Applicant's Response to Written Representations, which relate to the observations listed earlier are set out below and represent the council's latest position on these matters.	
WC-112	Issue Specific Hearing (ISH3): Traffic and Transport; and Ecology and Biodiversity	Ecology and Biodiversity	Reference WC-069 Ecology and Biodiversity, Biodiversity Net Gain (BNG) 4.122. The Applicant's response states: "The Minimum Mappable Units (MMU) for baseline UK Habitat Classification surveys across the Scheme was determined based on guidance presented in Section 2.2 of the UK Habitat Classification User Manual Version 1.0 (May 2018), published by the UK Habitat Classification Working Group. No updates to the guidance relating to MMU are presented in UK Habitat Classification Version 2.0 (2023). As such, the guidance set out within the UK Habitat Classification	The Minimum Mappable Units (MMU) for baseline UK Habitat Classification surveys across the Scheme was determined based on guidance presented in Section 2.2 of the UK Habitat Classification User Manual Version 1.0 (May 2018), published by the UK Habitat Classification Working Group. Section 2.2 of UK Habitat Classification User Manual Version 1.0 states the following: <i>"The UKHab has been designed to function at two scales:</i>

Reference	Theme	Issue	Comments	Applicant's Response
			User Manual Version 1.0 48 is considered to represent the most recent published guidance relating to MMU and represents a robust source from which to justify determination of MMU at the Solar PV Sites and Cable Route Corridor." 4.123. The Applicant is therefore specifying that the 2018 version of the UKHab Classification User Manual was used. For clarity, the BNG Assessment Report did not cite the 2018 version of the user manual or even include it in the References section, hence why the council queried where the approach adopted was actually advocated in the guidance, because as far as the council is aware, the approach adopted by the Applicant is not recommended in the current version of the UKHab document. This is because, importantly, the 2018 version of the document has been superseded by UK Habitat Classification Version 2.0 (UKHab Ltd. 2023) which was published in July 2023 and therefore should have been used for Lime Down	<i>If a project requires the detailed mapping of small features and where habitats could be very fine grained, it is recommended that surveyors use the fine-scale minimum mapping unit MMU (25m2, 5m length). The fine scale MMU may be used for urban or small scale rural development projects, detailed surveys of designated sites and where subtle habitat differences are considered important for the survey scope.</i> <i>If a project is to undertake surveys on a landscape scale or is only collecting data at broader scales, e.g. Level 3 – Broad Habitats, the large scale MMU (400m2 polygon and 20m length) is likely to be more appropriate. For some unenclosed upland areas, a larger MMU of 2500m2 may be selected to reduce the number of surveyor days in the field."</i> Whilst it is recognised by the Applicant that UK Habitat Classification User Manual Version 2.0 (2023) supersedes Version 1.0 (2018), Version 2.0 does

Reference	Theme	Issue	Comments	Applicant's Response
			Solar Park as it was published in time. The methodology detailed in the current UKHab document should have been used, and it is not considered appropriate to default to, and rely upon approaches detailed in the out-of-date version because it is more convenient for the project. All parts of the methodology from the 2018 version that the authors deemed still sound and appropriate for use would have been transposed across into the 2023 version, and so any omissions regarding MMUs from the 2023 are clearly intentional. 4.124. Critically, the ExA should note that in relation to UK Habitat Classification Version 2.0 (UKHab Ltd. 2023), UKHab Ltd states on its website: "It supersedes all older versions, which should not be used in any circumstances." (See for details: UKHAB Documentation – ukhab). 4.125. The Applicant's response to this matter then stipulates: "In line with the	not provide specific guidance on the recommended size of the Minimum Mappable Unit (MMU). In the absence of updated MMU guidance from UKHab Ltd., the Applicant considered it appropriate to apply the most recent published guidance relating specifically to MMU size, taking account of site size and scheme context, as set out in the response to WC-069 on pages 146–150 of The Applicant's Response to Written Representation [REP2-039]. The Applicant is not aware of any alternative published guidance from UKHab Ltd. or other relevant professional bodies that provides updated or equivalent guidance on MMU size for UKHab surveys. Consequently, the Applicant considers that reliance on the most recent published MMU-specific guidance represents the most appropriate and robust basis for ensuring consistency of habitat mapping across the Scheme.

Reference	Theme	Issue	Comments	Applicant's Response
			Handbook for Phase 1 Habitat Survey (2010 Edition), target notes were collected where notable ecological features, including habitat parcels that were too small in size to be captured by the MMU, were present." 4.126. It then states: "Habitats identified as target notes were not included within the BNG calculations presented within the BNG Assessment Report [REP1-089] and Statutory Biodiversity Metric [REP1-091], owing to the MMU and given that the habitat types were not notable in the context of the baseline habitats recorded. This limitation is recognised within the BNG Assessment Report [REP1-089] but is not considered significant for the reasons outlined above;..." 4.127. Firstly, the use of target notes is not considered to comprise a suitable substitute for appropriate mapping. Secondly, whilst there is a broad discussion regarding the limitation in the 'Limitations' section of the BNG	The Applicant also notes the recent publication of V2.1 of the UK Habitat Classification User Manual Version Consultation (published July 2026). This version has restored the MMU scales previously written in UK Habitat Classification User Manual Version 1.0 , and states: <i>"If a project is to undertake surveys on a landscape scale, large sites or is only collecting data of lower habitat precision, e.g. Level 3 – Broad Habitats, the standard scale MMU is likely to be more appropriate."</i> Most UKHab surveys are likely to use the standard scale. Although the Applicant notes V2.1 is a consultation draft, in the absence of any other updated or equivalent guidance, it is the Applicant's view that this provides assurance that the MMU adopted for the habitat surveys of the Scheme is appropriate.

Reference	Theme	Issue	Comments	Applicant's Response
			Assessment Report, contrary to the Applicant's Response, there is not a full explanation about the use of target notes for smaller areas of habitat and nor is there an explanation anywhere else in the BNG Assessment Report. Furthermore, the adopted methodology and use of target notes for smaller areas of habitat is not described in the ES Volume 3, Appendix 9-1: Ecological Baseline Report either as it should have been if the Applicant is relying on this approach and the use of very large MMUs. This is a significant omission from the description of the methodology employed. 4.128. The council therefore maintains its position in respect of the issues raised under WC-069 as the concerns raised have not been suitably addressed and the explanations in the Applicant's Response have not been adequately substantiated.	
WC-113	Issue Specific Hearing (ISH3): Traffic and	Ecology and Biodiversity	Reference WC-070 Ecology and Biodiversity, Biodiversity Net Gain (BNG)	See above for justification for the use of the defined MMU.

Reference	Theme	Issue	Comments	Applicant's Response
	Transport; and Ecology and Biodiversity		4.129. The Applicant's response confirms that the Minimum Mappable Unit of 400m² for area-based habitats and 20m for linear features which was applied across the Solar PV Sites was also applied within the Cable Route Corridor (CRC). Whilst the confirmation of method is acknowledged, this evidently should have been clearly explained in the methodology of the relevant submitted DCO documents and comprises a considerable omission. 4.130. As detailed in the council's comments above in respect of WC-069, the council remains concerned regarding the MMU adopted and does not consider it has been sufficiently justified given that contrary to the indication from the Applicant, the method used does comprise a deviation from the UKHab Classification User Manual seeing as Version 2.0 published in July 2023 should have been complied with for Lime Down Solar Park.	

Reference	Theme	Issue	Comments	Applicant's Response
WC-114	Issue Specific Hearing (ISH3): Traffic and Transport; and Ecology and Biodiversity	Ecology and Biodiversity	Reference WC-071 Ecology and Biodiversity, Biodiversity Net Gain (BNG) 4.131. It is noted that the Applicant's Response specifies: "The Applicant acknowledges that all individual trees comprising Irreplaceable Habitat have been grouped within a single row within the Statutory Biodiversity Metric [REP1- 091]. These features were consolidated within the Metric, as with other habitat elements within the Scheme." 4.132. This is not considered to provide a robust rationale for the deviation from The Statutory Biodiversity Metric User Guide (Last updated: 3 July 2025) (hereafter referred to as 'the User Guide'). It also fails to explain or address why no explanation was presented in the 'user comments' column in the metric to justify why the trees have been grouped together in one row and why no explanation has been provided within paragraphs 1.3.6	The Applicant acknowledges that all individual trees comprising Irreplaceable Habitat have been grouped within a single row within the Statutory Biodiversity Metric [REP4-047]. These features were consolidated within the Metric, as with other habitat elements within the Scheme. The Tree Helper is a tool to help calculate the area values for grouped individual trees for input into the Metric. It is not required to be filled in as part of a completed Metric. The Applicant notes that a GIS dataset containing all mapped pre-development and post-developed individual trees which have underpinned the Statutory Biodiversity Metric [REP4-047] and the BNG Assessment Report [REP4-045] was submitted to Wiltshire Council on 18 June 2026 to aid verification and corroboration.

Reference	Theme	Issue	Comments	Applicant's Response
			1.3.7 or the Limitations section of the BNG Assessment Report. 4.133. The information now provided is noted. The Applicant indicates in their response that the Tree Helper was used. If so, it is unclear why it was blank and not completed within the submitted metric. Evidently it should have been completed within the metric to allow review of the information. 4.134. The council's concerns have not been overcome or adequately addressed in respect of this matter.	
WC-115	Issue Specific Hearing (ISH3): Traffic and Transport; and Ecology and Biodiversity	Ecology and Biodiversity	Reference WC-073 and WC-074 Ecology and Biodiversity, Biodiversity Net Gain (BNG) 4.135. The Applicant's responses are noted. Nonetheless, the council remains concerned regarding the consolidation of habitat rows within the submitted Statutory BNG Metric and subsequent omission of individual	The Applicant acknowledges that Habitat Reference numbers provide a useful tool with which the Statutory Biodiversity Metric [REP4-047] could be compared to associated baseline and proposed habitat mapping, and the content of the Biodiversity Net Gain (BNG) Assessment Report [REP4-045]. Owing to the sheer number of individual habitat parcels (2,229 for Habitat Units

Reference	Theme	Issue	Comments	Applicant's Response
			habitat parcel references for the reasons already expressed and explained.	alone), the data were consolidated within the Statutory Biodiversity Metric [REP4-047], in accordance with the Statutory Biodiversity Metric QGIS Template and GIS Import Tool – User Guide. Consolidation of data is recognised as a limitation to the assessment, however, in the Applicant's view, sufficient justification for this decision has been provided. It should be noted that un-consolidated habitat data would not fit within a single Metric. The Applicant notes that a GIS dataset containing all mapped pre-development and post-developed individual trees which have underpinned the Statutory Biodiversity Metric [REP4-047] and the BNG Assessment Report [REP4-045] was submitted to Wiltshire Council on 18 June 2026 to aid verification and corroboration.

Reference	Theme	Issue	Comments	Applicant's Response
WC-116	Issue Specific Hearing (ISH3): Traffic and Transport; and Ecology and Biodiversity	Ecology and Biodiversity	Monitoring Discussion 4.136. Wiltshire Council confirms that at the time of ISH3 there had been no meaningful discussion between the Applicant and the council regarding the monitoring of BNG. However, shortly before the ISH, the Council had been in communication with the Applicant with a view to arranging a meeting between respective legal teams to discuss this matter. An initial meeting took place on 8 July 2026. 4.137. The council's preference would be for an appropriate contribution to be agreed and secured by means of legal agreement, namely section 106 agreement which should be index linked.	The Applicant notes this comment and will continue to engage with the Council on this matter.
WC-117	Issue Specific Hearing (ISH3): Traffic and Transport; and Ecology and Biodiversity	Ecology and Biodiversity	3.6 Grazing 4.138. Wiltshire Council has consistently advised, including in its statutory consultation response to the Preliminary Environmental Impact Report (PEIR), that livestock-grazed pasture, particularly	The Applicant notes this comment and agrees that permanent pasture (particularly cattle-grazed pasture) provides valuable foraging habitat for horseshoe bats, as acknowledged in paragraph 9.10.4 of ES Volume

Reference	Theme	Issue	Comments	Applicant's Response
			cattle-grazed pasture, can provide suitable foraging habitat for horseshoe bats, and can be especially important for juvenile greater horseshoe bats. The value of such existing habitat should be duly recognised, particularly where it exists within consultation zones around the component areas of the Bath and Bradford-on-Avon Bats Special Area of Conservation (SAC), including within the section of the greater horseshoe bat consultation zone around the Box Mine component of the SAC that coincides with the Cable Route Corridor (CRC).	1, Chapter 9 Ecology and Biodiversity [REP4-010].
WC-118	Issue Specific Hearing (ISH3): Traffic and Transport; and Ecology and Biodiversity	Ecology and Biodiversity	4.139. Prior to the DCO application being submitted, the council posed a query regarding whether the Applicant intended the Solar PV Sites to be grazed because contradictory information had been provided on this topic. 4.140. In Table 9-1 in Chapter 9 of the ES [REP1-016], the Applicant states: "For the PEIR assessment an assumption of worst case scenario for management of the	As discussed in ISH3, the Applicant confirms that the Environmental Statement, including ES Volume 1, Chapter 9 Ecology and Biodiversity [REP4-010] assesses the operational management of the Solar PV Sites on the basis that grassland will be managed through mowing and/or cutting and not grazing.

Reference	Theme	Issue	Comments	Applicant's Response
			solar array through mechanical cutting. Grazing was mentioned in reference to ecology to demonstrate that proposed benefits will be feasible and achievable via either cutting or grazing. The assessment presented in the ES chapter assumes operational management of grassland within the Solar PV Sites will be undertaken by cutting only." 4.141. Chapter 9 of the ES, paragraph 9.9.22 stipulates: "For the purpose of this assessment, and as described in Chapter 3: The Scheme [EN010168/APP/6.3], it is assumed all habitats within the Solar PV Sites will be managed with machinery and there would be no grazing. However, should consent be 51 granted, grazing by sheep will be explored, noting that there are no known landowner restrictive covenants or other reasons that would prevent such use. Management proposals are contained within the Outline LEMP [EN010168/APP/7.18]."	However, in the Applicant's does not consider that the ecological objectives of the Scheme are dependent upon grassland being managed exclusively through cutting. Appropriately managed grazing could also be incorporated during the operational phase, provided it is undertaken in accordance with the requirements of the Outline LEMP [REP3-100] and continues to deliver the biodiversity objectives secured by that document. As set out in the Outline LEMP [REP3-100], where grazing is adopted, management would need to ensure that grazing pressure remains compatible with the target habitat conditions. This may include, for example, the use of lower stocking densities than would typically be employed for agricultural production, rotational grazing, and avoiding excessive grazing during key flowering and seed-setting periods within areas of species-

Reference	Theme	Issue	Comments	Applicant's Response
			4.142. It then goes on to specify at paragraph 9.10.106: "Operational management of grassland areas may also include conservation-grazed pasture, which would target similar outcomes for biodiversity as grasslands managed through lowintensity cutting regimes, although this assessment assumes grazing would not occur during operation and maintenance of the Scheme." 4.143. Therefore, it is Wiltshire Council's understanding that the ES has been based on the assumption that grazing will not be undertaken. 4.144. During ISH3, Wiltshire Council stated that it had nothing to add on this matter. This is because the council considered that the points discussed aligned with and covered those which it had already detailed in writing in what comprised a draft 'Post Hearing Submission' prepared in advance of the hearing, and which now comprises this final iteration of that document.	rich grassland. Such measures would ensure that the desired habitat structure and botanical diversity of grasslands are maintained regardless of whether they are managed via cutting and / or grazing.

Reference	Theme	Issue	Comments	Applicant's Response
WC-119	Issue Specific Hearing (ISH3): Action Point Responses	Action Point 10 (Transport): Mark up areas on a plan where you consider highway improvement areas may be required.	5.1. The council has included two plans as contained within Appendix E to this submission in response to this Action Point. 5.2. The council requests that the ExA, the Applicant and other parties, refer also to Wiltshire Council's comments on the Transport Assessment (Rev 3) [REP3-066], as contained within its Comments on Deadline 3 Submissions document, which will also be submitted at Deadline 4. 5.3. Precise positioning of HGV passing place improvements outside the current HIA is dependent of topographical survey coverage of 'all' the narrow rural lane lengths proposed for construction access and knowledge of actual widths at intervals. 5.4. The comment on this point reads "At the ISH3 Hearing it was noted that base topographical survey drawings for 'all' the minor roads forming the HGV construction routes should be provided, with the actual carriageway width dimensions indicated at	The Applicant has submitted locations along the construction routes to Lime Down A-C and Lime Down D (via Bradfield cottage) showing two HGVs passing in Annex K of ES Volume 3 Appendix 13-1: Transport Assessment [REP4-037]. As requested, the drawings now include road width geometry at the passing places, which demonstrate at least a 5.5 metre road width to allow two HGVs to pass, as specified by Wiltshire Council. The council considers that additional works to accommodate two-way HGV passage on the rural lanes outside the Alderton Road HIA are required. For clarity, the Applicant is also proposing widening along the Fosse Way, which is outside of the HIA works on Alderton Road. The proposed widening works on Alderton Road and Fosse Way are shown in Annex I of ES Volume 3 Appendix 13-1: Transport Assessment [REP4-037].

Reference	Theme	Issue	Comments	Applicant's Response
			intervals. It was suggested by Wiltshire Council that each road should employ a chainage line, with widths indicated at, say, 10m intervals. As 5.5m is the minimum width necessary for 2-way HGV passage, and 4.8m for car / HGV passage (MfS), it would be helpful to colour-shade route sections with carriageway widths 5.5m or greater and 4.8-5.5m, with unshaded lengths then indicating lengths with a width of less than 4.8m. This would provide a better 'at a glance' suitability of the existing routes, which is difficult to pick up from the swept path plots where a lot of underlying base detail is masked".	At the request of the Examining Authority, the applicant has also submitted information at Annex I of ES Volume 3 Appendix 13-1: Transport Assessment [REP4-037] showing locations where widths of 5.5 metres and 6.0 metres will be available. Further topographical data is being obtained, and the requested topographical base data will be provided at Deadline 6.
WC-120	Issue Specific Hearing (ISH3): Action Point Responses	Action Point 13 (Ecology): Mitigation – Submit the referenced case law on European Protected Species (EPS) surveys.	5.5. The Conservation of Habitats and Species Regulations 2017 ('the Habitats Regulations') transpose Council Directive 92/43/EEC on the Conservation of Natural Habitats and Wild Flora and Fauna ('the Habitats Directive') into English law. 5.6. The Proposal has the potential to affect species, including bats, which are the subject of the highest level of species	The Applicant notes the Council's summary of the legislative framework relating to European Protected Species (EPS) and agrees that, in determining the application, the Secretary of State must discharge their duties as the competent authority under the Conservation of Habitats and Species Regulations 2017 (as amended). The Applicant considers that ES Volume 1, Chapter 9 Ecology

Reference	Theme	Issue	Comments	Applicant's Response
			protection as a European protected species ('EPS') under regulation 42 and Schedule 2 to the Habitats Regulations. 5.7. The Secretary of State in considering the application is a 'competent authority' pursuant to regulation 7(1) of the Habitats Regulations. By regulation 9(3), a competent authority must have regard to the requirements of the Habitats Directive so far as they may be affected by the exercise of their functions: R (Morge) v Hampshire County Council [2011] UKSC 2; 1 WLR 268. 53 5.8. Article 12 of the Habitats Directive provides that Member States must take the requisite measures to establish a system of strict protection for the animal species listed in Annex IV(a) in their natural range, prohibiting, amongst other matters, 'deliberate disturbance of these species'. Article 16 provides for derogations from Article 12.	and Biodiversity [REP4-010], the HRA Report [REP3-090], and associated application documents have been prepared in accordance with the relevant legislative requirements, published guidance and applicable case law. The Applicant considers that sufficient information has been provided to enable the Secretary of State to discharge those duties. The assessment on ecological features presented in ES Volume 1, Chapter 9 Ecology and Biodiversity [REP4-010] has identified the protected species for which there is a reasonable likelihood of occurrence within the Order Limits, assessed the potential effects of the Scheme on those species, and identified embedded avoidance, mitigation and, where appropriate, compensation measures. The assessment has been undertaken using a precautionary approach and, where uncertainty remains, has assumed the

Reference	Theme	Issue	Comments	Applicant's Response
			5.9. To ensure compliance with the Habitats Directive, the Habitats Regulations make it a criminal offence deliberately to disturb or to damage or destroy the breeding site or resting place of an EPS (regulations 40 and 41). However, Natural England as the 'appropriate nature conservation body' (regulation 5(1)(a) and (b)) can, under regulation 53, grant a licence to permit derogations from the protection otherwise afforded by the Habitats Directive to EPS. 5.10. Natural England can grant a derogation licence under regulation 53(2)(e) if there are 'imperative reasons of overriding public interest including those of a social or economic nature...' ('IROPI'); but regulation 53(9) also proscribes the grant of a licence unless Natural England is satisfied 'that there is no satisfactory alternative' and 'that the action authorised will not be detrimental to the maintenance of the population of the species concerned at a favourable	presence of protected species within suitable habitat where appropriate. Accordingly, the conclusions of the Environmental Statement do not rely upon demonstrating the presence / absence of European Protected Species through additional survey. Instead, the assessment has considered the reasonable worst-case scenario and the secured avoidance and mitigation measures have been developed on that basis. This approach ensures that the assessment of likely significant effects and the application of the mitigation hierarchy remain robust, notwithstanding that some pre-construction surveys and detailed design will necessarily occur following the grant of development consent. The Applicant also notes that the DCO process necessarily provides a degree of flexibility during detailed design to enable the final alignment and construction methodology to be refined following consent. This flexibility enables

Reference	Theme	Issue	Comments	Applicant's Response
			conservation status in their natural range'. Therefore, a licence cannot be issued unless three conditions are satisfied: (i) there are IROPI, (ii) there is no suitable alternative; and (iii) a favourable conservation status will be maintained. 5.11. A competent authority considering the impacts on a species protected by the Habitats Regulations needs to have regard to Article 12, which includes consideration of whether there would be 'deliberate disturbance' requiring a derogation under Article 16. 5.12. Paragraph 99 of the Biodiversity and Geological Conservation: Circular 06/2005 ('the Circular') explains: '99. It is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before the planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the decision. The need to ensure ecological	the mitigation hierarchy to be applied effectively where uncertainty remains, for instance through micro-siting of cable installation to enable avoidance of impacts on protected species. This approach is reflected throughout the Outline EPMS [REP4-055] and Outline CEMP [REP4-049], which secures pre-construction surveys, ecological supervision, exclusion zones and design refinement where necessary. Accordingly, post-consent ecological surveys are intended to refine the implementation of the secured avoidance and mitigation measures, rather than to establish the measures required. The Applicant also considers that requirements for EPS licences have been thoroughly considered. The ES Chapter 9 [REP4-010], Outline EPMS [REP4-055] and HRA Report [REP3-090], where licences may be required. Where impacts can reasonably be avoided through embedded design and mitigation, the

Reference	Theme	Issue	Comments	Applicant's Response
			surveys are carried out should therefore only be left to coverage under planning conditions in exceptional circumstances, with the result that the surveys are carried out after planning permission has been granted. However, bearing in mind the delay and cost that may be involved, developers should not be required to undertake surveys for protected species unless there is a reasonable likelihood of the species being present and affected by the development. Where this is the case, the survey should be completed and any necessary measures to protect the species should be in place, through conditions and/or planning obligations, before the permission is granted. In appropriate circumstances the permission may also impose a condition preventing the development from proceeding without the prior acquisition of a licence under the procedure set out in section C below.' 5.13. Paragraph 116 of the Circular explains: 'When dealing with cases where	Scheme has been designed to avoid the need for a licence in accordance with the mitigation hierarchy. Where a licence may ultimately be required following detailed design and or pre-construction surveys, this has been clearly identified and appropriate mechanisms have been secured to ensure compliance with the legislative requirements. This approach has been shared with Natural England, who have not raised any objections. The Applicant has, for example, already secured approval to use the District Level Licensing Scheme for great crested newts within the Cable Route Corridor through an Impact Assessment and Conservation Payment Certificate countersigned by Natural England [REP2-041]. The Applicant therefore considers that the submission documents contain sufficient ecological information to enable the Secretary of State, as competent authority, to understand the likely effects

Reference	Theme	Issue	Comments	Applicant's Response
			a European protected species may be affected, a planning authority is a competent authority within the meaning of regulation 6 of the Habitats Regulations, and therefore has a statutory duty under regulation 3(4) to have regard to the requirements of the Habitats Directive in the exercise of its functions. So the Directive's provisions are clearly relevant in reaching planning decisions, and these should be made in a manner which takes them fully into account. The Directive's requirements include a strict system of protection for European protected species, prohibiting deliberate killing, catching or disturbing of species, the taking of eggs etc. and damage to or destruction of their breeding sites or resting places. Derogations from this strict protection are allowed only in certain limited circumstances and subject to certain tests being met (see para 112 above). Planning authorities should give due weight to the presence of a European protected species on a development site	of the Scheme on European Protected Species, to determine whether the proposed avoidance, mitigation and licensing strategy is capable of ensuring compliance with the Conservation of Habitats and Species Regulations 2017 (as amended). The Applicant therefore considers that the Scheme accords with the relevant legislative framework and applicable case law.

Reference	Theme	Issue	Comments	Applicant's Response
			to reflect these requirements, in reaching planning decisions, and this may potentially justify a refusal of planning permission.' 5.14. The competent authority is required to consider whether it is likely that the proposed development would cause a disturbance, and if so whether it is likely that Natural England would grant a derogation licence: Morge at §29, §44. 'Likely' connotes no more than "serious possibility": R (Wilkinson) v South Hams [2016] EWHC 1860 (Admin) at §39. 5.15. That requires an assessment of the nature and extent of the negative impact of the activity in question upon the species and, ultimately, a judgment as to whether that is sufficient to constitute a 'disturbance' of the species: Morge at §19, §22, §29. 5.16. As explained in Bagshaw v Wyre Borough Council [2014] EWHC 508: '(i) The Defendant has a statutory duty under regulation 9(3) of the 2010 Regulations to	

Reference	Theme	Issue	Comments	Applicant's Response
			have regard to the requirements of the Habitats Directive. Paragraph 99 of the Circular states:- "It is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before planning permission is granted..." I accept that the Defendant established the presence or otherwise of protected species, namely the bats. However I do not accept that they established "the extent that they may be affected by the proposed development." As Lord Brown said in R (Morge) v Hampshire County Council¹⁵ at paragraph 19 "whilst it is true that the word "significant" is omitted from article 12(1)(b)....that cannot preclude an assessment of the nature and extent of the negative impact of the activity in question upon the species and, ultimately, a judgment as to whether that is sufficient to constitute a "disturbance" of the species." I bear in mind fully what Baroness Hale said at paragraph 36,	

Reference	Theme	Issue	Comments	Applicant's Response
			namely that the court should not impose too demanding a standard upon officers' reports, but she also said that 55 the reports "obviously have to be clear and full enough to enable them (i.e. the planning authority) to understand the issues and make up their minds within the limits that the law allows them." The Defendant, in my judgment, did not do that here.' 5.17. In summary, before determining the application, the Secretary of State as competent authority is required to consider (and thus must be satisfied the survey work is adequate to conclude in respect of): • Whether there are likely to be impacts on EPS • The extent to which any relevant EPS may be affected by the proposal • Whether a derogation licence is likely to be required • If a derogation licence is likely to be required, whether Natural England are likely to grant it. 5.18. Completing the analysis is important so as to comply with the Secretary of State's functions as a	

Reference	Theme	Issue	Comments	Applicant's Response
			competent authority. It is also necessary so that impacts on protected species can properly be weighed in the planning balance. It is not possible to weigh impacts unless likely effects are first established.	
WC-121	Issue Specific Hearing (ISH3): Action Point Responses	Action Point 14 (Ecology): Mitigation – To cover in their post-hearing submissions information regarding the application of the mitigation hierarchy.	5.19. In all its previously submitted representations pertaining to the DCO application (as listed below), Wiltshire Council has raised concerns regarding deficiencies in the methodology employed to establish the ecological baseline; the associated implications for the assessment of impacts on ecological receptors presented in 6.1 ES Volume 1 Chapter 9 Ecology and 7.10 Habitats Regulations Assessment Report (HRA); and the implications for ensuring that the avoidance, mitigation and compensation measures put forward are appropriate and adequate and are in full accordance with the mitigation hierarchy. The concerns raised in RR-4934 are also set out in 8.2	The Applicant notes Wiltshire Council's continued concern regarding the approach to baseline surveys and application of the mitigation hierarchy and refers to the responses provide to Wiltshire Council comments on this matter in the following documents: • Applicant's Response to Relevant Representations [PDA-009] • Applicant's Response to the Local Impact Report [REP2-038] • Applicant's Response to Written Representations [REP2-039] • Applicant's Response to the Examining Authority's First Written Questions [REP3-128]

Reference	Theme	Issue	Comments	Applicant's Response
			Statement of Common Ground with Wiltshire Council [REP2-025]. • Wiltshire Council's Relevant Representation [RR-4934]; • Wiltshire Council's Local Impact Report (LIR) [REP1-137]; • Wiltshire Council's Written Representation [REP1-138]; • Wiltshire Council Comments on Submissions Received at Deadlines 1 and 1A [REP2-048]; • Wiltshire Council Comments on Submissions Received at Deadline 2 [REP3-141]; and • Wiltshire Council Response to ExA's First Written Questions (ExQ1) [REP3-142]. 5.20. Wiltshire Council maintains its stance that the methodology employed by the Applicant to determine the ecological baseline, both in terms of the desk study	• Applicant's Response to Comments Received at Deadline 2 [REP3-129] • Statement of Common Ground with Wiltshire Council [REP4-061] • Applicant's Response to Submissions Received at Deadline 3 [REP4-082] It remains the Applicant's view that the information collected is proportionate to the nature of works and ecological risks associated with different elements of the Scheme, the ecological features present, the potential impact pathways, and the likelihood of significant effects occurring. Overall, the Applicant maintains the appropriate application of the mitigation hierarchy has been adopted throughout all stages of the Scheme and the survey strategy is sufficient to inform the impact assessment and the conclusions presented within ES Volume 1, Chapter 9 Ecology and Biodiversity [REP4-010] and the HRA Report [REP3-090].

Reference	Theme	Issue	Comments	Applicant's Response
			and field survey, particularly in respect of the Cable Route Corridor (CRC), is insufficient and not suitably comprehensive to ensure that the Scheme has been designed in a manner that has enabled full application of the mitigation hierarchy. This is especially important given the Applicant's decision to rely on the 'Rochdale Envelope' approach.	
WC-122	Issue Specific Hearing (ISH3): Action Point Responses	Action Point 14 (Ecology): Mitigation – To cover in their post-hearing submissions information regarding the application of the mitigation hierarchy	5.21. In respect of the desk study, non-statutory nature conservation sites within 2 km of the Solar PV Sites have been identified in 6.1 ES Volume 1 Chapter 9 Ecology. For the CRC, however, the desk study only considered the CRC itself with no search beyond the boundary of the Order Limits. Therefore, as detailed in [RR-4934] and [REP2-025], Wiltshire Council considers the desk study methodology used for the CRC to be inadequate as it has not entailed the identification of any international, national or local designated sites, habitats of principal importance (HPI) / priority habitats or ancient woodland beyond the	The Applicant notes the Council's comments but maintains the view that the desk study methodology for the CRC is proportionate and sufficient to support a robust assessment of likely significant effects. The Applicant does not agree that a wider search area for non-statutory designated sites is essential due to the short-term, localised and temporary nature of works with the CRC. Temporary construction compounds (and associated lighting), dust deposition and noise impacts will be subject to embedded mitigation and additional controls secured

Reference	Theme	Issue	Comments	Applicant's Response
			CRC even though it extends the substantial distance of approximately 22km and some sections will be up to approximately 665m wide with temporary construction compounds sited throughout the CRC. Wiltshire Council deems this approach to be inadequate because construction activities could give rise to impacts, such as an increase in light spill / intrusive light, dust and particulate matter generation and noise and vibration, that could adversely affect nearby non-statutory sites and HPs / priority habitats and the species they support, beyond the Order Limits. As it stands, the potential for indirect and short-term / temporary effects, rather than solely the potential for direct and longer-term / permanent effects, on all ecological receptors not just within the CRC but also beyond the CRC, has not been wholly evaluated in the council's view.	through the Outline CEMP [REP4-049] and Outline EPMS [REP4-055], limiting the potential for effects beyond the working area. It is noted that a wider search area for non-statutory designated sites was adopted at the Preliminary Environmental Information Report (PEIR) stage of the project. At this stage, all non-statutory designated sites within the Cable Route Search Corridor (which covered a larger area than the CRC), were presented within the PEIR, and this information was used to help define the narrower CRC. The Applicant therefore considers the Rochdale Envelope has been applied appropriately, with the CRC assessed on the basis of the maximum reasonable construction impact. Embedded mitigation and controls secured through the Outline CEMP [REP4-049] and Outline EPMS [REP4-055] provide further assurance that significant adverse effects beyond the

Reference	Theme	Issue	Comments	Applicant's Response
				CRC or beyond the short-term will be avoided.
WC-123	Issue Specific Hearing (ISH3): Action Point Responses	Action Point 14 (Ecology): Mitigation – To cover in their post-hearing submissions information regarding the application of the mitigation hierarchy	5.22. Furthermore, although the intention is to reinstate sections of hedgerows that will be subject to removal to facilitate works within the CRC, the impacts to the habitat will not be immediately reversed upon reinstatement and the adverse effect will not necessarily be short-term. This should be reflected accordingly in 6.1 ES Volume 1 Chapter 9 Ecology.	The Applicant agrees with the Council's comment that impacts to hedgerow habitats will not be immediately reversed upon reinstatement of temporarily removed sections of hedgerow. As acknowledged in paragraph 9.10.138 of ES Volume 1, Chapter 9 Ecology and Biodiversity [REP4-010] there will be a time lag between removal of discrete sections of hedgerows and the subsequent establishment of reinstated sections of hedgerow in these locations to achieve comparable functionality and value to wildlife. This will result in a significant residual adverse effect as reported in ES Volume 1, Chapter 9 Ecology and Biodiversity [REP4-010]. However, the Applicant does not consider that this significant residual adverse effect will persist beyond five years. This conclusion reflects the relatively short lengths of

Reference	Theme	Issue	Comments	Applicant's Response
				hedgerow requiring removal at any one location (meaning connectivity is largely retained) and the commitment to reinstate all temporarily removed hedgerows using the same species composition during the first available planting season, as secured through the Outline EPMS [REP4-055]. The Applicant therefore considers this is reflected accordingly in ES Volume 1, Chapter 9 Ecology and Biodiversity [REP4-010].
WC-124	Issue Specific Hearing (ISH3): Action Point Responses	Action Point 14 (Ecology): Mitigation – To cover in their post-hearing submissions information regarding the application of the mitigation hierarchy	5.23. The approach to the desk study method for the CRC and the underpinning rationale presented by the Applicant in APP-198 is considered to be representative of the way that the potential mechanism for adverse effects on ecological receptors as a result of impacts associated with the proposed activities within the CRC has been underestimated. There appears to be an assumption that there will be no or limited pathways for impacts on ecological features and receptors beyond the	The Applicant notes the Council's comments but maintains the view that the desk study methodology for the CRC is proportionate and sufficient to support a robust assessment of likely significant effects. The Applicant does not agree that a wider search area for non-statutory designated sites is essential due to the short-term, localised and temporary nature of works with the CRC.

Reference	Theme	Issue	Comments	Applicant's Response
			construction footprint of the CRC. However, it is deemed that the desk study is sufficient to have enabled that conclusion to be robustly substantiated.	Temporary construction compounds (and associated lighting), dust deposition and noise impacts will be subject to embedded mitigation and additional controls secured through the Outline CEMP [REP4-049] and Outline EPMS [REP4-055], limiting the potential for effects beyond the working area. It is noted that a wider search area for non-statutory designated sites was adopted at the Preliminary Environmental Information Report (PEIR) stage of the project. At this stage, all non-statutory designated sites within the Cable Route Search Corridor (which covered a larger area than the CRC), were presented within the PEIR, and this information was used to help define the narrower CRC. The Applicant therefore considers the Rochdale Envelope has been applied appropriately, with the CRC assessed on the basis of the maximum reasonable construction impact.

Reference	Theme	Issue	Comments	Applicant's Response
				Embedded mitigation and controls secured through the Outline CEMP [REP4-049] and Outline EPMS [REP4-055] provide further assurance that significant adverse effects beyond the CRC or beyond the short-term will be avoided.
WC-125	Issue Specific Hearing (ISH3): Action Point Responses	Action Point 14 (Ecology): Mitigation – To cover in their post-hearing submissions information regarding the application of the mitigation hierarchy	5.24. The methodology employed for establishing the ecological baseline, in particular for the CRC, is considered inadequate to suitably support reliance on adoption of the Rochdale Envelope approach. Collation of comprehensive information and data is required to establish the ecological baseline and to facilitate a sound and suitably accurate assessment of potential impacts on ecological receptors based on potential worst-case pathways for effects and ensuring application of the precautionary principle. It is considered that this requirement has not been fully met.	The Applicant does not agree that the ecological baseline for the Cable Route Corridor is inadequate to support the application of the Rochdale Envelope approach. The Applicant acknowledges that the assessment on ecological features must be based on sufficient ecological information to enable the likely significant effects of the Scheme to be robustly assessed. The Applicant considers that this requirement has been met.

Reference	Theme	Issue	Comments	Applicant's Response
			5.25. It is important that adequate and appropriate data and information has been obtained by means of desk study and field survey in order to establish the ecological baseline of not just the Site but also any areas beyond the boundary of the Order Limits that could be subject to effects (most likely indirect effects in respect of the latter), such as on account of the presence of functional habitat connectivity between on-site and off-site habitats. The acquisition of adequate ecological baseline information is necessary to inform and refine the Scheme design, the routing of the cable, locations for site compounds, locations for implementation of HDD and so forth and to ensure that avoidance, mitigation and compensation measures proposed are sufficient and appropriate for the intended purpose. 5.26. Comprehensive ecological surveys, including an appropriate level of Phase 2 / species-specific survey should have been undertaken early in the design process	Ecological baseline information has been obtained through desk study, habitat surveys, protected species surveys where considered appropriate, consultation with relevant stakeholders and a review of baseline information collected for other similar Schemes. The resulting baseline has informed both the iterative design of the Scheme, including locations of Temporary Construction Compounds and 'avoidance area' where HDD will be adopted, and the assessment of likely significant effects presented within ES Volume 1, Chapter 9 Ecology and Biodiversity [REP4-010] and the HRA Report [REP3-090]. It remains the Applicant's view that the information collected is proportionate to the nature of works and ecological risks associated with different elements of the Scheme, the ecological features present, the potential impact pathways, and the likelihood of significant effects occurring.

Reference	Theme	Issue	Comments	Applicant's Response
			and prior to submission of the DCO application. This is necessary to ensure that adequate ecological baseline data regarding the presence / likely absence of species / species groups and details of species assemblages and population sizes had been collated to suitably inform the assessment of impacts on ecological receptors detailed in 6.1 ES Volume 1 Chapter 9 Ecology and 7.10 HRA.	The Applicant maintains the approach is sufficient to inform the impact assessment and the conclusions presented within ES Volume 1, Chapter 9 Ecology and Biodiversity [REP4-010] and the HRA Report [REP3-090] .
WC-126	Issue Specific Hearing (ISH3): Action Point Responses	Action Point 14 (Ecology): Mitigation – To cover in their post-hearing submissions information regarding the application of the mitigation hierarchy	5.27. The council has consistently raised concern regarding the lack of any Phase 2 / species-specific surveys within the CRC; including but not limited to bat survey within the section of the CRC that coincides with a greater horseshoe bat consultation zone that extends 4km from the Box Mine component of the Bath and Bradford-on-Avon Bats Special Area of Conservation (SAC). The Council has repeatedly advised that collation of an appropriate level of baseline data through dedicated Phase 2 survey would have served to ensure that the assessments presented in 6.1 ES Volume 1 Chapter 9	The Applicant does not agree that the ecological baseline for the Cable Route Corridor is inadequate to underpin either ES Volume 1, Chapter 9 Ecology and Biodiversity [REP4-010] or the HRA Report [REP3-090] . The Applicant recognises that CIEEM's <i>Guidelines for Ecological Impact Assessment</i> (2018) and BS 42020:2013 require ecological surveys to be appropriate and proportionate to the nature, scale and likely ecological risks of the proposed development.

Reference	Theme	Issue	Comments	Applicant's Response
			Ecology and 7.10 HRA are suitably robust, accurate and reliable. 5.28. It is recognised that in the absence of ecological data obtained by means of targeted Phase 2 / species-specific survey, the Applicant has assumed presence of protected species within areas of suitable or potentially suitable habitat and specifies that they have designed mitigation on that basis. However, this approach is not in accordance with best practice as detailed in Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine (CIEEM, 2018) and BS 42020: 2013 Biodiversity: Code of practice for planning and development (British Standards Institute, 2013) which sets out that appropriate survey should be conducted to inform the formulation of appropriate and adequate avoidance, mitigation and compensation measures;	The Applicant considers that the survey strategy adopted for the Scheme accords with those principles. Whilst targeted species-specific surveys have been undertaken where appropriate, including at the Solar PV Sites, it was not considered proportionate to undertake comprehensive species-specific surveys throughout the Cable Route Corridor, particularly under the circumstances where the final construction footprint will only be established through detailed design and where impacts on protected species can be avoided through micro-siting and through management at the construction phase (for instance through sensitive timing and methods of working). The Applicant does not accept the suggestion that assuming the presence of protected species within suitable habitat has been used as a substitute for ecological survey.

Reference	Theme	Issue	Comments	Applicant's Response
			nor does it permit full application of the mitigation hierarchy. 5.29. Whilst the council recognises that it is prudent and acceptable to take a proportionate approach when determining the scope of ecological survey required for a project and that this should be informed by the potential pathways 58 for effect, nevertheless, it considers that adopting the approach of assuming presence of species within suitable habitat does not comprise a panacea or substitute for comprehensive ecological baseline data where this legitimately need to be informed by survey to ensure a sufficiently sound assessment. Furthermore, adopting this approach should not be overly relied upon to preclude undertaking the requisite level of ecological survey and this view is augmented by the aforementioned guidance. 5.30. As expressed by Wiltshire Council during ISH3, the approach adopted by the Applicant is too heavily reliant on further	The Applicant considers it forms part of an appropriate, proportionate and precautionary assessment methodology. In such circumstances, the assessment presented in ES Volume 1, Chapter 9 Ecology and Biodiversity [REP4-010] has assumed the presence of protected species where appropriate and has assessed impacts on that reasonable worst-case basis. Embedded avoidance, mitigation and, where appropriate, compensation measures have then been developed to address identified potential impacts. The Applicant also does not agree that the mitigation hierarchy has not been fully applied. The Scheme has sought to avoid impacts through route selection, design evolution and the identification of ecological avoidance areas during the iterative design process.

Reference	Theme	Issue	Comments	Applicant's Response
			ecological survey being undertaken at the detailed design stage to establish presence / likely absence of protected species. The council also specified during ISH3 that it acknowledges that it is not a novel approach to conduct some pre-commencement ecological survey to inform micro-siting, such as to check for any newly created badger setts. The council expressed, however, that an appropriate level of Phase 2 survey should have been conducted earlier in the design stage and prior to submission of the DCO application to have enabled establishment of the ecological baseline and the presence / likely absence status of species together with the likely need for any protected species mitigation licences. In turn, this would have served to inform the design and layout of the Scheme, the formulation of avoidance, mitigation and compensation measures that are fit for purpose and in full accordance with the mitigation hierarchy. Importantly it would	The Applicant acknowledges that, for the Cable Route Corridor element of the Scheme the final alignment and construction footprint cannot be fixed at the DCO decision stage. The controlled flexibility afforded by the Rochdale Envelope and secured through DCO requirements enables the mitigation hierarchy to be applied effectively during detailed design. Where uncertainty remains, pre-construction surveys, ecological supervision and micro-siting provide further opportunities to avoid ecological impacts before and during construction. Accordingly, post-consent ecological surveys are intended to refine the implementation of the secured mitigation and maximise opportunities for impact avoidance, rather than to establish the acceptability of the Scheme in principle.

Reference	Theme	Issue	Comments	Applicant's Response
			have also ensured that the impact assessment presented in the 6.1 ES Volume 1 Chapter 9 Ecology and 7.10 HRA had been based on adequate ecological information and data and that the ExA had been provided with adequate information to inform their decision. 5.31. As articulated by Wiltshire Council during ISH3, if it transpired as a result of ecological survey conducted at the detailed design and micro-siting stage, that a mitigation licence or licences, such as for bats, would be required to allow legal derogation from the legislative protections and to allow works to proceed lawfully, and to avoid killing of, or injury to protected species and / or damage to, or destruction of their resting places and habitat, this raises a number of issues. Firstly, this will mean that at that late juncture, it will be necessary to formulate and secure appropriate mitigation and compensation measures, which may include the identification or design of a suitable receptor site and / or	Similarly, where detailed design or pre-construction surveys identify that impacts on protected species cannot reasonably be avoided, the Outline EPMS [REP4-055] secures the preparation and implementation of appropriate species-specific mitigation and, where necessary, the obtaining of the relevant protected species licences before works affecting those species commence. The Applicant does not agree that this represents a deficiency in ES Volume 1, Chapter 9 Ecology and Biodiversity [REP4-010] and considers it to reflect the established legislative process whereby the detailed measures required to lawfully implement a consented scheme are informed by the final design and up-to-date ecological information available prior to construction. The Applicant therefore considers that the ES Volume 1, Chapter 9 Ecology and Biodiversity [REP4-010], HRA Report [REP3-090] and Outline EPMS

Reference	Theme	Issue	Comments	Applicant's Response
			compensatory habitat which should be in place and available to the species in question before further impacts occur and that a licence is acquired from Natural England to facilitate this process. It is also means that details of the confirmed presence of that species / species group and adequate consideration of the associated effect would not have been fully covered by means of the 6.1 ES Volume 1 Chapter 9 Ecology (and 7.10 HRA where applicable). 5.32. Although 6.1 ES Volume 1 Chapter 9 Ecology and 7.10 HRA are based on an assumption of presence, the council considers that this is not wholly reflected in the assessments and the proposed avoidance, mitigation and compensation measures. Instead, it assumes that the presence of any species for which the presence / likely absence status is not definitively known at this stage due to lack of dedicated survey, can be readily dealt with at the detailed design stage, post determination of the DCO	[REP4-055] provide the Secretary of State with sufficient information to understand the likely ecological effects of the Scheme, the basis on which those effects have been assessed, and the mechanisms through which the mitigation hierarchy will continue to be applied during detailed design and construction

Reference	Theme	Issue	Comments	Applicant's Response
			application. The approach fails to accord with 59 the principles of the mitigation hierarchy as set out in national and county planning policy and best practice. 5.33. As highlighted by Wiltshire Council during ISH3, the 'harm' in the approach employed by the Applicant is not confined to the potential for harm to species and habitats but extends to the deficiencies in the application and the associated ecological methodologies and assessments mean that the ExA is not in possession of the requisite information to inform their recommendation. As aforementioned, it also undermines confidence that the Scheme design and layout has been refined and progressed on the basis of adequate ecological baseline information and that the proposed mitigation will be sufficient. The council wishes to reiterate the importance that the ExA has adequate certainty and confidence in respect of the ecological baseline presented in the DCO	

Reference	Theme	Issue	Comments	Applicant's Response
			application and that the associated mitigation proposed and assessment of impacts is sound given the Applicant's decision to rely on the Rochdale Envelope approach.	
WC-127	Issue Specific Hearing (ISH3): Action Point Responses	Action Point 18 (Ecology): Hedgerow removal wording in the DCO – Review the changes proposed by the applicant in Schedule 12 and DCO article 40(1) and provide comments.	5.34. The 3.1 Draft Development Consent Order (Rev 3) [REP3-006] and 3.2 Explanatory Memorandum (Rev 3) [REP3-008] have been reviewed. It is noted that column (2) of the table in Part 1 of Schedule 12 has been updated to refer to the TPO and hedgerow plan rather than the hedgerows plan. 5.35. Wiltshire Council also notes that the hedgerow ID references have been updated column (1) of the table in Part 2 of Schedule 12, and that column (2) now cites the TPO and hedgerow plan rather than the hedgerows plan. The lengths of important hedgerow have also been amended in column (2). These changes do not, however, appear to be listed in the Schedule of Changes table at the front of 3.2 Explanatory Memorandum (Rev 3)	These changes and the reasons provided are reflected in the Schedule of Changes to the Draft Development Consent Order submitted at Deadline 3. As the Schedule of Changes captures all of the combined changes from each deadline, these can be found within the latest version of the Schedule of Changes to the Draft Development Consent Order [REP4-075] submitted at Deadline 4, at pages 27 and 28.

Reference	Theme	Issue	Comments	Applicant's Response
			[REP3-008] or explained in this document as should have been the case for completeness and transparency.	
WC-128	Issue Specific Hearing (ISH3): Action Point Responses	Action Point 18 (Ecology): Hedgerow removal wording in the DCO – Review the changes proposed by the applicant in Schedule 12 and DCO article 40(1) and provide comments.	5.36. The council notes the inclusion of the following footnote to the tables in Part 1 and 2 of Schedule 12: "The extent to which each hedgerow listed in this table may be removed is controlled by the ecological protection and mitigation strategy, pursuant to article 40(4) of the Order." 5.37. It is also recognised that Article 40(4) in Part 6 of the dDCO states: "(4) The undertaker may, for the purposes of the authorised development or in connection with the authorised development and subject to paragraph (2), remove 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 60 protection and mitigation strategy approved pursuant to	The Applicant considers that the powers to remove an extent of hedgerows in the areas identified within Part 1 and Part 2 of Schedule 12, as constrained by the Ecological Protection and Mitigation Strategy, are appropriate and typical of the approach across made solar DCOs. The Hedgerow Removal Plan within Annex A of the Outline EPMS [REP4-055] has been updated to identify the minimum and maximum extents of hedgerow removal at each location. A range of hedgerow removal minimum and maximum extents have been identified within the Hedgerow Removal Plan corresponding to different elements of the Scheme. The minimum extent represents the Applicant's minimum expectation of the hedgerow removal required to construct the different elements of the Scheme based on the

Reference	Theme	Issue	Comments	Applicant's Response
			requirement 8 in Schedule 2 (requirements)." 5.38. Paragraph 4.6.11 of 3.2 Explanatory Memorandum (Rev 3) [REP3-008] explains the provisions of Article 40 and states: "The Article also allows the undertaker to remove those hedgerows specified in Schedule 12 (Hedgerows to be removed) Schedule 12 is divided into Part 1 (Removal of hedgerows), Part 2 (Removal of important hedgerows) and Part 3 (Trees subject to tree preservation orders). Article 40(4) clarifies that the power is to remove hedgerows specified in Parts 1 and 2 of Schedule 12, to the extent set out in the Ecological Protection and Mitigation Strategy approved pursuant to Requirement 8 in Schedule 2." 5.39. In Action Point 18, the ExA asks the council to review the changes in DCO Article 40(1) and to provide comments, however, the only amendments observed are the	current design. The maximum extent identifies the worst-case extent of removal that may be required and has been included to retain an appropriate degree of flexibility during the detailed design stage. Additional text has been included within Method Statement 5 of the Outline EPMS [REP4-055] at Deadline 5 to clarify that, prior to any hedgerow removal works, the extent of removal at each location will be determined through detailed design and construction planning, with the use of existing gaps in hedgerows prioritised wherever practicable to minimise the need for removal. The method statement also confirms that the maximum extents shown on the Hedgerow Removal Plan represent an upper limit and will not automatically be removed.

Reference	Theme	Issue	Comments	Applicant's Response
			aforementioned. Whilst the council welcomes the inclusion of the footnote to Part 1 and 2 of Schedule 12, the council was already aware of the provisions of Article 40(4) and does not consider that the amendments overcome or adequately address the concerns and issues it has already raised and detailed in full in previous representations.	
WC-129	Issue Specific Hearing (ISH3): Action Point Responses	Action Point 18 (Ecology): Hedgerow removal wording in the DCO – Review the changes proposed by the applicant in Schedule 12 and DCO article 40(1) and provide comments.	5.40. Moreover, no further information has been submitted to substantiate why it is necessary to list every hedgerow within the Order Limits if as the Applicant advises, all hedgerow removal will be controlled by the provisions of Article 40(4) and be undertaken in accordance with that prescribed within the Ecological Protection and Mitigation Strategy (EPMS) in any case. Again, the adopted approach to Schedule 12 brings into question why the overly wide powers afforded by Schedule 12 are in fact needed and why the extent of removal cannot be refined within the schedule. The council considers that it should, at the very least, be	The Applicant does not consider that a minimum extent of hedgerow removal is appropriate as it could result in unnecessary adverse ecological or landscape and visual effects in situations where, as part of the process of micro siting hedgerow removal, it becomes apparent that no hedgerow is required to be removed in that location to facilitate the Scheme. The Outline EPMS [REP4-055] already contemplates a maximum extent of hedgerow removal for different elements of the Scheme at paragraphs 3.4.2, 3.4.3, 6.2.3 and 6.2.4 of this document

Reference	Theme	Issue	Comments	Applicant's Response
			possible to specify in column (2) of Part 1 and Part 2 of Schedule 12, a range of hedgerow removal i.e. a minimum and maximum extent of hedgerow that may need to be removed from each of the hedgerows listed. This should be possible given the provisions of Article 40(4) and the footnotes in Schedule 12.	
WC-130	Issue Specific Hearing (ISH3): Action Point Responses	Action Point 18 (Ecology): Hedgerow removal wording in the DCO – Review the changes proposed by the applicant in Schedule 12 and DCO article 40(1) and provide comments.	5.41. In Wiltshire Council's Relevant Representation [RR-4934], it was highlighted that the stipulation that hedgerow removal within the Bath and Bradford-on-Avon Bat SAC consultation zone will be restricted to 10m has not been transposed into the relevant rows of Schedule 12. Previously this had been ascertained by the council to constitute Sheet 40 to 45 inclusive of the Hedgerow Removal Plans but would now be the relevant sheets in the TPO and hedgerow plans. This request has still not been fulfilled, and no rationale has been provided by the Applicant as to why this is the case. The omission of the restrictions to hedgerow removal proposed in the	The Applicant notes Wiltshire Council's comment and refers to the Applicant's response provided to the Examining Authority's Question (ExQ) DCO2.10 on this precise matter. The Applicant remains confident in its drafting of article 40 and notes that it is consistent with other made solar DCOs, and remains confident that there is continuity across the relevant submission documents.

Reference	Theme	Issue	Comments	Applicant's Response
			HRA from the relevant rows of Schedule 12 undermines confidence that the measures set out in the HRA will actually be delivered, despite the footnotes added to Schedule 12, Part 1 and Part 2 and the provisions of Article 40(4). The council is unclear and unconvinced as to why continuity across the dDCO, the EPMS and the HRA has not been deemed permissible by the Applicant if the council and ExA is to 61 have certainty that Article 40(4) and the footnotes to Schedule 12 will be adhered to strictly.	
WC-131	Issue Specific Hearing (ISH3): Action Point Responses	Action Point 26 (Ecology): Monitoring – Applicant to discuss with Wiltshire Council the mechanism to ensure resources for monitoring, including Biodiversity Net Gain,	5.42. Whilst it is recognised that the ExA requested an update to be provided at Deadline 5, Wiltshire Council and the Applicant had a productive initial meeting on Wednesday 8 July to discuss mechanisms to compensate the council in order to ensure sufficient resources are available for undertaking post consent activities, including monitoring, during the construction, operational and decommissioning phases.	The Applicant notes this comment and will continue to engage with the Council on this matter.

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		and submit an update.	5.43. Wiltshire Council welcomed the agreement by the Applicant in principle for cost recovery and it may be that a variety of cost recovery mechanisms are put in place and utilised to cover the various activities and stages. 5.44. Both parties took away actions from this meeting in order to progress discussions. A further update will be provided at Deadline 5 as requested.	
WC-132	Issue Specific Hearing (ISH4): Draft Development Consent Order	Main Discussion Points	2.1 Article 2 – Interpretation 6.1. The council indicated that it continued to be concerned by the broadness of the definition of maintain in the way that the ExA has identified. Whilst it was noted that article 5 says, it is considered that that still leaves a very broad definition of maintain that could permit whole scheme replacement and re-powering by stages, which is not subject to any controls at all. 6.2. The council proposed some amended wording so that the definition was	Please refer to the Applicant's response to Second Written Question DCO2.4 within the Applicant's Response to the Examining Authority's Second Written Questions [EN010168/EAM/9.54] .

Reference	Theme	Issue	Comments	Applicant's Response
			constrained by what's been assessed in the ES, but also what's been secured by the documents certified under Article 42. 6.3. The proposed drafting was as follows: "maintain" includes inspect, repair, adjust, alter, remove, refurbish, reconstruct, replace (including scheduled replacement of components of the authorised development where such replacement remains within the parameters assessed in the environmental statement and secured by the documents certified under article 42 and the requirements) and improve any part of the authorised development, but does not include the removal, reconstruction or replacement of the whole of the authorised development other than such scheduled replacement where it remains within those assessed and secured parameters, and "maintenance" and "maintaining" are to be construed accordingly; 6.4. The council also welcomed the Applicant's suggestion to strengthening	

Reference	Theme	Issue	Comments	Applicant's Response
			the management plans to include an enhanced definition of exactly what activities were covered under operation and maintenance.	
WC-133	Issue Specific Hearing (ISH4): Draft Development Consent Order	Main Discussion Points	2.2 Article 9 – Application of Highway Authority Permit Scheme 6.5. Wiltshire Council considered its permit scheme, which has been in place since 2020, to be very successful. It is the council's main tool for knowing what works are planned on its network so that it can fulfil its network management duty to coordinate all the works and activities on the highway. The operation of the permit scheme allows the council to make sure that the network flows and that there's minimal disruption, which is called expeditious movement of traffic on the highway. 6.6. The permit scheme requires developers to apply for permission to undertake works on the highway, and through granting permission, the council can apply conditions to any permits given.	The Council's permit scheme will continue to operate as modified by Article 9 where it relates to the Scheme. Regarding the Council's concerns that it will lose the ability to manage traffic on its own network, this is not correct. The protective provisions for the benefit of Wiltshire Council as local highway authority will require the undertaker to demonstrate how it has complied with Wiltshire Council's permit scheme in order to secure prior approval for the works. The Council will also be required to approve the detailed Construction Traffic Management Plan under Requirement 15 of the draft DCO [REP4-004], which will also set out the measures that will need to

Reference	Theme	Issue	Comments	Applicant's Response
			However, any conditions that were proposed to be applied would have to be justifiable. 6.7. Wiltshire Council is a pragmatic authority and is not unreasonable in the decisions reached. However, the application of the permit scheme is the council's main tool for network management and therefore any dilution of the council's normal powers would be a concern. It was also impede the council's ability to coordinate all the other activities on the highway that might interact with these works. 6.8. During the course of a normal permit application, the developer would apply for the works they wanted to undertake and indicate when they wanted to do the works. The council would then either agree the permit or ask for a postponement. Under section 56 of the New Roads and Street Works Act 1991, the council can ask for and give direction, so that it can negotiate an alternative	be in place to manage impacts on Wiltshire's road network.

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			route for that apparatus as well. The council would have the ability to request for a range of conditions, including looking at the methodology for the works so that they are less impactful on the network and also those which might reduce future maintenance needs as well.	
WC-134	Issue Specific Hearing (ISH4): Draft Development Consent Order	Main Discussion Points	6.9. Within the council's response to ExQ1 DCO1.13 [REP3-142], the council proposed alternative drafting for Article 9. This alternative drafting would disapply the appeal rights contained within Schedule 16 of the dDCO, in order for the dispute mechanism within the council's protective provisions for the benefit of the local highway authority to be utilised instead. 6.10. The council indicated that dispute resolution is part of the day-to-day management of the permitting process, and therefore escalation to the Secretary of State seemed disproportionate given that the council is always pragmatic and reasonable in the utilisation of its section	As set out in the Applicant's Written Summary of Oral Submissions from Issue Specific Hearing 4 [REP4-087], there are a range of dispute resolution mechanisms available that can be utilised as part of Article 9. The key point from the Applicant's perspective is that there is a set timeframe within which disputes are determined to provide certainty as to delivery of the Scheme. The dispute resolution process under Schedule 16 provides a consistent process for the timely management of disputes. However, another option noted was the arbitration mechanism under

Reference	Theme	Issue	Comments	Applicant's Response
			58 powers to prevent works in order to protect its asset. 6.11. The dispute mechanism currently within the council's preferred protective provisions would refer any dispute for expert determination by a single, independent and suitable person with appropriate qualifications. The expert must be instructed within 14 days of notification of the dispute	Article 44, with Schedule 14 of the DCO setting out the details of that process. The protective provisions for Wiltshire Council also provide a process for resolving dispute by expert determination. The expert determination process contemplated by the protective provisions for the benefit of Wiltshire Council as local highway authority also provide for disputes to be resolved by expert determination. As application of article 9 is also considered through the protective provisions approval process, it would be open to Wiltshire Council to request any disputes relating to article 9 be dealt with through that process. If Wiltshire Council would prefer that Article 9 utilised the arbitration dispute resolution process under Article 44 or the expert determination process under the protective provisions rather than Schedule 16, the Applicant can update Article 9 to reference this.

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WC-135	Issue Specific Hearing (ISH4): Draft Development Consent Order	Main Discussion Points	6.12. Discussions between the council and the Application regarding the protective provisions for the benefit of the local highway authority are ongoing. Considerable progress is being made, and the council is confident that an acceptable form will be able to be agreed before the close of the examination. 6.13. The council clarified that the concern regarding the current drafting of Article 9 is the restriction to the council's ability to impose legitimate permit conditions affecting timing, phasing, traffic management and coordination. Furthermore, an appeals process escalating any dispute direct to the Secretary of State would be too formal and burdensome for day-to-day traffic network management and that the expert determination route proposed through the protective provisions would be much faster and more effective. 6.14. However, the council considers that an appropriate compromise would be	The Applicant cannot accept the proposed modifications to Article 9 as they would enable Wiltshire Council to impose conditions that would amount to a moratoria where provided in combination with other reasons. Please see above response for proposed amendments regarding dispute resolution however.

Reference	Theme	Issue	Comments	Applicant's Response
			to tighten 9(2) and disapply Schedule 16 for Wiltshire in 9(3) of the Applicant's original as follows: • Replace Article 9(2)(a) with: "a permit may not be refused, or granted subject to conditions, solely on the basis that the permit authority has imposed restrictions under section 58 (restrictions on works following substantial road works) or section 58A (restrictions on works following substantial roads works) of the 1991 Act" • Delete Article 9(4) • Add an Article 9(3)(b): "where Wiltshire Council is the permit authority, or where the refusal, condition or dispute relates to works to which Part [X] of Schedule 15 applies, Schedule 16 does not apply to any refusal of a permit, the grant of a permit subject to conditions, or any dispute arising under this article, and any such matter must be determined in	

Reference	Theme	Issue	Comments	Applicant's Response
			accordance with the dispute resolution procedure in Part [X] of Schedule 15."	
WC-136	Issue Specific Hearing (ISH4): Draft Development Consent Order	Main Discussion Points	2.3 Articles 10 and 15 – Power to Alter Streets and Agreements with Street Authorities 6.15. The council indicated that whilst the change of "may" to "must" in relation to obtaining consent from the street authority would help, it wouldn't alleviate the council's concerns as the 6-week determination timescale under Article 47 is a real concern given that the council will have no idea as the scale or complexity of any highway works outside of the DCO Order Limits, which the Applicant may seek to propose in the future.	Please refer to the Applicant's Response to Second Written Question DCO2.13 within the Applicant's Response to the Examining Authority's Second Written Questions [EN010168/EXAM/9.54]..
WC-137	Issue Specific Hearing (ISH4): Draft Development Consent Order	Main Discussion Points	6.16. The council considers that the Applicant should follow the standard Wiltshire Council section 278 agreement process for works outside the Order Limits. Furthermore, as the council understands it, the protective provisions at present do not cover works outside the	The Applicant has prepared the draft protective provisions to incorporate matters that the Council requires under its standard form section 278 agreement and considers those protective provisions to be the most appropriate mechanism for addressing these matters.

Reference	Theme	Issue	Comments	Applicant's Response
			DCO and Works Plans, as they refer precisely to road works and cable works. Therefore, they would not provide an alternative mechanism to resolve the council's concern in respect of this Article. 6.17. The council explained that there are two types of section 278 application. There is the full legal agreement and then a more tailored approach for small, very minor works, which is sometimes referred to as a 278 permit. The 278 permit is used for very minor works, which are not on major roads, and where the developers are willing to provide any bond requirement on a cash bond basis, as opposed to using a surety, in which case it would form part of a formal, sealed agreement. 6.18. The council acknowledged that there were no defined timescales inherent in the section 278 process that would provide the certainty that the Applicant was seeking. The council agreed to continue	The Applicant was provided with the Council's standard form section 278 agreement which it has used to prepare the development of the protective provisions. Should there be any other matters that Wiltshire Council considers must be incorporated from its standard s278 agreements (or if there are separate matters that it considers missing from its s278 permitting process), the Applicant welcomes proposed amendments to the protective provisions to address these.

Reference	Theme	Issue	Comments	Applicant's Response
			discussions with the Applicant in respect of this. 6.19. It may be that this can be suitably addressed through protective provisions which allow necessary highway works to come forward as and when required, including unforeseen works, but through a proper approval, inspection, security 65 and dispute-resolution frameworks. This would avoid fragmentation without removing the council's highway control. 6.20. However, it is the council's position that for highway works, particularly on minor rural roads, 6-week deemed consent is not appropriate. These are safetycritical and asset-protection decisions. They may require detailed design, road safety audit, structural approval, drainage review, traffic management, condition surveys, inspection, security, certification and maintenance controls. It is not simply a resourcing matter.	

Reference	Theme	Issue	Comments	Applicant's Response
WC-138	Issue Specific Hearing (ISH4): Draft Development Consent Order	Main Discussion Points	6.21. Furthermore, the council maintained its position that the CTMP is not an adequate substitute. A CTMP manages construction traffic. It does not typically approve detailed highway design or replace the technical approval regime that would ordinarily apply to works affecting the public highway. Technical approval would cover such things as how the council wants the works to be done, indemnity when on-site and bonds, which are not addressed through the CTMP. This was a major consideration when pressing for the protective provisions.	The Applicant maintains that it is typical with NSIPs for such matters to be captured within the detailed design approval process of Requirement 5, and the detailed CTMP that Wiltshire Council will approve. The protective provisions now being negotiated should provide an extra layer of comfort for Wiltshire Council however.
WC-139	Issue Specific Hearing (ISH4): Draft Development Consent Order	Main Discussion Points	6.22. Additionally, the council queried why there was a need for the broad powers conferred by Articles 10 and 15 if it is as the Applicant states that approval is managed through the CTMP.	Please see page 10 of the Applicant's Written Summary of Oral Submissions from Issue Specific Hearing 4 [REP4-087]. Articles 10 and 15 provide the statutory power which is then constrained in how it can be exercised by the CTMP and protective provisions. This avoids the

Reference	Theme	Issue	Comments	Applicant's Response
				Applicant needing to obtain separate statutory consents for these powers.
WC-140	Issue Specific Hearing (ISH4): Draft Development Consent Order	Main Discussion Points	2.4 Article 11 – Construction and Maintenance of Altered Streets 6.23. The council indicated that as Article 11 only related to streets which the Applicant had altered under Works Numbers 8A or 8B, it would not cover the wider damage to the network. 6.24. Whilst the council noted the recent additions to the CTMP regarding pre- and post-works road condition surveys, including interim surveys during the construction phase, the council's preference would be for an overarching section 59 agreement. This agreement would define the roads to be covered, with plans, the form the surveys would take, when the surveys would be done and how often etc.	As the matters that would be captured by a s59 agreement are already captured by the Outline CTMP [REP4-057] , a separate s59 agreement would duplicate the outline CTMP and is not appropriate.
WC-141	Issue Specific Hearing (ISH4): Draft	Main Discussion Points	6.25. The council also recognised that there was some recognition by the Applicant that the development would	Please refer to above response.

Reference	Theme	Issue	Comments	Applicant's Response
	Development Consent Order		introduce trafficking onto the rural lanes in the area. However, it is the council's position that the trafficking would be extraordinary under the definition of section 59 of the Highways Act 1980 and therefore the council foresees that there will be future disagreements as to whether the damage is as a result of the Applicant's scheme. Therefore, the council's position is that a formal section 59 agreement is required.	
WC-142	Issue Specific Hearing (ISH4): Draft Development Consent Order	Main Discussion Points	6.26. The council will continue discussions with the Applicant regarding the protective provisions for the benefit of the local highway authority as there was some confusion as to whether the situation outlined above, was sufficiently covered within the protective provisions.	The Applicant notes this comment.
WC-143	Issue Specific Hearing (ISH4): Draft Development Consent Order	Main Discussion Points	2.5 Article 14 – Access to Works 6.27. From a highway's perspective in terms of visibility splays, the council would be seeking compliance with the DMRB or Manual for Streets, based on speed	The proposed points of access to the Solar PV Sites and Cable Route Corridor are provided in Annex C and Annex D of ES Volume 3 Appendix 13-1: Transport Assessment [REP4-037] , where deliverable access visibility has

Reference	Theme	Issue	Comments	Applicant's Response
			surveys that have confirmed 85th percentile speeds. The council considers this is a detailed design matter, but the council did not envisage a scenario where it would accept a design that was sub-standard.	been provided in accordance with recorded 85th percentile speeds, particularly for the permeant access points serving the Solar PV sites. Where visibility cannot be provided there will be banksmen ensuring safe egress from Sites, and traffic management measures could be put in place if considered necessary (e.g. speed restrictions; temporary traffic lights; stop/go signs) during the construction phase. The preference for the temporary construction access points for the Cable Route Corridor would be to avoid hedge removal where possible by providing banksmen ensuring safe egress from Sites, and traffic management measures to be put in place if considered necessary (e.g. speed restrictions; temporary traffic lights; stop/go signs). We also note that compliance with the DRMB standard is required by the draft protective provisions for Wiltshire Council.

Reference	Theme	Issue	Comments	Applicant's Response
WC-144	Issue Specific Hearing (ISH4): Draft Development Consent Order	Main Discussion Points	6.28. Substantially more detailed design information would be required from the Applicant before approval for the works could be granted.	The Applicant notes this comment, and that Wiltshire Council has a role in approving the works under the protective provisions, the detailed design under Requirement 5, and the detailed CTMP under Requirement 15 of the Draft DCO [REP4-004] .
WC-145	Issue Specific Hearing (ISH4): Draft Development Consent Order	Main Discussion Points	6.29. However, due to the inter-related management plans proposed for this scheme, the council acknowledges the need for different specialisms to work together during the discharge process.	The Applicant notes this comment and that a post-consent PPA is under discussion between the Applicant and Wiltshire Council for facilitating the discharge of requirement process.
WC-146	Issue Specific Hearing (ISH4): Draft Development Consent Order	Main Discussion Points	6.30. The council has also been having discussions with the Applicant off-line with regard to the timing and sequencing of when the different management plans would be brought forward for discharge. The council has also raised concern regarding the council's ability to seek amendment to a previously discharged management plan, should it consider it necessary for the plan to be amended as a result of a	See above response.

Reference	Theme	Issue	Comments	Applicant's Response
			subsequently submitted management plan.	
WC-147	Issue Specific Hearing (ISH4): Draft Development Consent Order	Main Discussion Points	2.6 Article 16 – Traffic Regulation Measures 6.31. In response to the ExA's query on why consultation and advertising was required to be undertaken twice, the council confirmed that the national standard practice is to advertise your intention to make an order and then a week prior to the commencement of works, a second advert in the newspaper would be required to publicise the order. This essentially allows people sufficient time to object to a proposed order and for any made order to be sufficiently publicised. 6.32. It is the council's position that the timeframes currently contained within Article 16 don't enable the national standard practice to be adhered to. This is also linked to the Permit Scheme, as the current Wiltshire timeframe for a permit with a road closure, which would be a	Please refer to the Applicant's Written Summary of Oral Submissions from Issue Specific Hearing 4 [REP4-087]. At page 19, the Applicant explains that the four week period is for the notification of the approval rather than the approval itself, which would occur through Requirement 15 of the Draft DCO [REP4-004] and allows for 10 weeks.

Reference	Theme	Issue	Comments	Applicant's Response
			major permit, requires 12 weeks. The time is also required to consider Passenger Transport provision, as the works may affect a diversion route for other works, for example. 6.33. The council is prepared to reduce the required timeframe from 12 weeks to 8 weeks, but the council would not be able to comply with 4 weeks and still fulfil its statutory duties. Furthermore, the council envisages that regular, perhaps fortnightly, meetings would be held with the Applicant to review progress against the plan, so a constant dialogue would be maintained during the construction phase. 6.34. The council will continue discussions with the Applicant regarding the timeframes, mechanisms and parameters which would apply in relation to this.	
WC-148	Issue Specific Hearing (ISH4): Draft	Main Discussion Points	2.7 Article 41 – Felling or Lopping of Trees Covered by Tree Preservation Order	Please refer to the Applicant's Response to Action Point 4 at page 44 and 45 of the Written Summary of the Applicant's

Reference	Theme	Issue	Comments	Applicant's Response
	Development Consent Order		6.35. The council clarified that in relation to Statutory Undertakers, the council is notified of works that are going to be carried out to trees protected by a TPO or within Conservation Areas. The council is given opportunity to comment on the proposals and to request that works are carried out or not carried out. Furthermore, these works don't typically result in a tree being felled. 6.36. Therefore, the council would expect some form of notification that the works would be being carried out. This would also enable the council to keep its records up to date.	Oral Submissions and Responses at Issue Specific Hearing 4 and Responses to Action Points [REP4-087].
WC-149	Issue Specific Hearing (ISH4): Draft Development Consent Order	Main Discussion Points	6.37. Furthermore, the powers conferred under the Electricity Act are not as wide ranging as the powers sought under this DCO. The DCO does not include any kind of statutory process for refusal and / or appeals, therefore there are much more restricted powers under the Electricity Act than that sought by the Applicant in this instance.	Please refer to the Applicant's Response to Action Point 3 at page 44 of the Written Summary of the Applicant's Oral Submissions and Responses at Issue Specific Hearing 4 and Responses to Action Points [REP4-087].

Reference	Theme	Issue	Comments	Applicant's Response
WC-150	Issue Specific Hearing (ISH4): Draft Development Consent Order	Main Discussion Points	6.38. The council noted that replanting is typically conditioned through the application process and would determine the tree, the species, the location and its management.	These matters are controlled under the Draft DCO [REP4-004] , through Requirement 7 and the Outline LEMP [REP3-100] .
WC-151	Issue Specific Hearing (ISH4): Draft Development Consent Order	Main Discussion Points	6.39. Another concern of the council is that trees are dynamic and they're changing all the time. Therefore, a tree that is currently not considered to be worthy of protection, may well be so in the future as its current condition will be different in say 40 years' time. This is especially pertinent given the scheme's proposed 60-year operational life. The council must have confidence that legitimate protections will be applicable to all necessary trees. Whilst the council acknowledges that the DCO would not prevent new TPOs being made across the Order Limits, the Applicant's obligation to adhere to the protections afforded by it are constrained through the drafting of Article 41.	The Applicant notes this comment.

Reference	Theme	Issue	Comments	Applicant's Response
WC-152	Issue Specific Hearing (ISH4): Draft Development Consent Order	Main Discussion Points	6.40. Whilst the council acknowledges that outline management plans continue to be developed and refined by the Applicant, the council considers that the Arboricultural Impact Assessment and Arboricultural Method Statements should be certified under Schedule 13. The council wants to ensure that the trees are well managed and well protected during construction, operation and decommissioning, and that the management methods keep pace with legislation and changing best practice.	The relevant management plans controlling impacts on trees during construction, operation, and decommissioning are the Outline CEMP [REP4-049] , Outline OEMP [REP4-051] , Outline DS [REP3-096] and Outline EPMS [REP4-055] . These are all plans that must be certified under Article 42 and Schedule 13 of the Draft DCO [REP4-004] .
WC-153	Issue Specific Hearing (ISH4): Draft Development Consent Order	Main Discussion Points	2.8 Requirements – Approach to Permitted Preliminary Works 6.41. The council are content with the principle of having a Permitted Preliminary Works Management Plan and appreciates the Applicant's willingness to progress this through the provision of an initial draft Plan at Deadline 4. 6.42. However, without knowing the extent of the detail that's contained within the proposed Plan at this stage, the council	The Applicant has submitted the Permitted Preliminary Works Environmental Management Plan [EN010168/EXAM/9.63] at Deadline 5. That plan is currently secured through Requirement 13 and the Applicant considers must necessarily be secured as a detailed, rather than outline plan, in order to fulfil its function in allowed permitted works to proceed during the discharge of requirement process for the other outline management plans. The

Reference	Theme	Issue	Comments	Applicant's Response
			reserves judgement on whether there would be sufficiently detailed information contained within it to enable the Plan to be certified by the Secretary of State, rather than covered through a separate 68 Requirement. The inclusion of a separate Requirement would enable the outline version to be certified by the Secretary of State, and for the detailed version to be submitted to the LPA for approval post-consent.	Applicant welcomes comments from Wiltshire Council on the plan once it has reviewed this following Deadline 5.
WC-154	Issue Specific Hearing (ISH4): Draft Development Consent Order	Main Discussion Points	2.9 Schedule 2 - Requirements Requirement 5: 6.43. The council indicated that its previously expressed position is that Requirement 5 should not be restricted to Work Nos. 1, 2 and 3, and that the council's preference would be that works within Work Nos 5, 6, 7, 8, 9 and 10 were also included. However, the council has listened to what the Applicant has said that these elements are covered through the management plans, and therefore it would be extremely helpful if the Applicant	The Applicant has prepared a Mitigation Route Map [EN010168/EXAM/9.59] at Deadline 5 that should assist the Council with identifying how the relevant mitigation measures are secured through management plans.

Reference	Theme	Issue	Comments	Applicant's Response
			could provide a schedule which set out the exact paragraph and place in all relevant management plans which addresses the council's concerns. For the avoidance of doubt, the council's considers that the schedule should not only cover the council's concerns regarding Requirement 5 but all other concerns expressed by the council to date. 6.44. This would potentially provide comfort that the council's concerns are being suitably addressed, as when the Applicant has previously indicated that a requested Requirement, as contained within the council's LIR for example, was already captured within the management plans, the council had been unable to find the relevant provisions within the management plans which included all elements of the requested commitments / conditions.	
WC-155	Issue Specific Hearing (ISH4):	Main Discussion Points	Requirements 6 to 20:	Please refer to pages 25 and 26 of the Written Summary of the Applicant's

Reference	Theme	Issue	Comments	Applicant's Response
	Draft Development Consent Order		6.45. The “substantially in accordance with” wording has appeared in made DCO’s, including made solar Orders. However, there is also made-DCO precedent for requiring plans to be “in accordance with” the outline documents, and for using a more tailored approach. 6.46. The existence of precedent does not justify the blanket use of “substantially” across Requirements 6 to 20. The council considers that the Applicant should either delete the work or justify, requirement by requirement, why flexibility is necessary and how it will be prevented from eroding secured mitigation. 6.47. As requested by the ExA the council has identified those Requirements where justification is sought from the Applicant in its response to ISH4 Action Point 5 below.	Oral Submissions and Responses at Issue Specific Hearing 4 and Responses to Action Points [REP4-087].
WC-156	Issue Specific Hearing (ISH4): Draft	Main Discussion Points	Requirement 6: 6.48. With respect to the Applicant's intended approach for the periodic review	The Applicant notes this comment.

Reference	Theme	Issue	Comments	Applicant's Response
	Development Consent Order		of the Battery Safety Management Plan to reference technological advances as the batteries are replaced, to be included within the management plan itself rather than additional wording incorporated into the Requirement, the council raised no objections to that approach and would consider the specific wording proposed once it had been submitted into examination.	
WC-157	Issue Specific Hearing (ISH4): Draft Development Consent Order	Main Discussion Points	Requirement 15: 6.49. The council confirmed that it was still seeking the amendments to Requirement 15 as contained within its response to ExQ1 DCO1.44 [REP3-142] because the protective provisions do not resolve all of the council's concerns. The requirements and protective provisions are complimentary but do not fulfil the same purpose. 6.50. The council noted that their proposed drafting was a composite from various DCOs, including Little Crow Solar Park Order 2022, Oaklands Farm Solar	The Applicant has prepared a Mitigation Route Map [EN010168/EXAM/9.59] at Deadline 5 that should assist the Council with identifying how the relevant mitigation measures are secured through management plans, including the Outline CTMP [REP4-057]. The Applicant awaits the Council's comments on the latest draft protective provisions and anticipates these will be imminently agreed with Wiltshire Council.

Reference	Theme	Issue	Comments	Applicant's Response
			Park Order 2025, and Rampion 2 Offshore Wind Farm Order 2025. 6.51. Furthermore, given that the Construction Traffic Management Plan is currently required to be "substantially in accordance with" the outline Construction Traffic Management Plan, the inclusion of these items within the Requirement would prevent the parties invoking the dispute resolution provision in the event that the council didn't consider that all of the matters had been suitably addressed in the final plan. Hence, the belt and braces style approach that the council is advocating for here. 6.52. The council welcomes the Applicant's commitment to set out where they consider the requested elements are already covered within the management plan(s).	
WC-158	Issue Specific Hearing (ISH4): Draft	Main Discussion Points	Requirement 20: 6.53. The council expressed a number of concerns regarding the	Please refer to the Applicant's Response to Action Point 7 at page 46 and 47 of the Written Summary of the Applicant's Oral Submissions and Responses at

Reference	Theme	Issue	Comments	Applicant's Response
	Development Consent Order		Decommissioning and Restoration Requirement. 6.54. With regards to the lack of a secured bond within the DCO, whilst the council appreciates the Applicant's confirmation in their response to ExQ1 CA1.3 [REP3-128] that decommissioning securities are covered within the agreements with landowners to cover the cost of decommissioning in the event of breach by the Applicant or in the event of insolvency of the Applicant, without further information on the details of the bond or the size of it, it doesn't resolve the council's concern. This is because even if the landowner has the money, the obligation for decommissioning is on the Undertaker and the council couldn't prosecute the landowner when the obligation is on the Undertaker. Therefore, there would be no form of redress available to the council to guarantee decommissioning and restoration in the event that the	Issue Specific Hearing 4 and Responses to Action Points [REP4-087].

Reference	Theme	Issue	Comments	Applicant's Response
			Undertaker disappeared or became insolvent. 6.55. The council is also concerned that given the varying length of the land leases, and the fact that subsequent agreement with the landowners would be required for the scheme to remain in place for the proposed 60-year life of the scheme, the Applicant may be forced to decommission the scheme in a piecemeal fashion based on the length of secured land agreements. This staged decommissioning activity could occur over a considerable period of time, with consequential knock-on impacts to the residents and public. Furthermore, it is not currently clear whether the potential environmental effects of this has been properly assessed, including the impact on the local population. The council considers that there its too much uncertainty at present as to how decommissioning would actually operate.	

Reference	Theme	Issue	Comments	Applicant's Response
WC-159	Issue Specific Hearing (ISH4): Draft Development Consent Order	Main Discussion Points	6.56. The lack of a back-stop date for decommissioning activity is also linked to another point that the council is concerned about, in that the commencement dates could vary for each of the individual component parts. The council considers that decommissioning should be constrained to 60-years from the first date of final commissioning for the authorised development as a whole, so that the scheme doesn't end up having an overall life of 75 years or more.	Please refer to the Applicant's Response to Action Point 8 at page 50 of the Written Summary of the Applicant's Oral Submissions and Responses at Issue Specific Hearing 4 and Responses to Action Points [REP4-087] .
WC-160	Issue Specific Hearing (ISH4): Draft Development Consent Order	Main Discussion Points	6.57. Furthermore, it is the council's position that the phasing timetable and plan should be submitted to and approved by the relevant planning authority, rather than just submitted to it.	The purpose of providing phasing information is not for the Council to have control over the Applicant's approach to phasing, but to provide information to the Council to enable it to have greater oversight of the works taking place. For that reason, it is not appropriate for an approval mechanism to be in place.
WC-161	Issue Specific Hearing (ISH4): Draft	Main Discussion Points	6.58. The above points are as set out within the council's Written Representation [REP1-138].	Please refer to the Applicant's Response to Action Point 7 at page 46 and 47 of the Written Summary of the Applicant's Oral Submissions and Responses at

Reference	Theme	Issue	Comments	Applicant's Response
	Development Consent Order		6.59. The council welcomes the Applicant's commitment to review the commissioning wording and the confirmation that it was their intention that the 60-year life would take effect from the date of final commissioning of the first part, rather than for each individual part. The council would also welcome any further information which could be provided by the Applicant on how enforcement mechanisms contained within the Planning Act 2008 could be utilised by the council to use the money paid to the landowner for decommissioning activities.	Issue Specific Hearing 4 and Responses to Action Points [REP4-087].
WC-162	Issue Specific Hearing (ISH4): Draft Development Consent Order	Main Discussion Points	2.10 Schedule 16 – Procedure for Discharge of Requirements 6.60. In the council's previously submitted representations, the council has been requesting a 12-week discharge period. There is precedent for this in other made solar DCOs, noting that the determination period in Cottom Solar Project DCO was 13 weeks. Furthermore, the council considers that that the period	Please refer to the Applicant's Response to Second Written Questions, in particular DCO2.13 within the Applicant's Response to the Examining Authority's Second Written Questions [EN010168/EXAM/9.54].

Reference	Theme	Issue	Comments	Applicant's Response
			for requesting further information should be extended to 20 working days, which would be in line with the Mallard Pass Solar Farm DCO.	
WC-163	Issue Specific Hearing (ISH4): Draft Development Consent Order	Main Discussion Points	6.61. Additionally, the council considers that the Applicant should be required to undertake a least one round of pre-submission consultation prior to submission of its discharge application, in order to resolve any immediate issues and / or concerns with the proposed documents. The Applicant should be required to submit details of the consultation undertaken and the response to it as part of their discharge submission.	Please refer to page 32 Written Summary of the Applicant's Oral Submissions and Responses at Issue Specific Hearing 4 and Responses to Action Points [REP4-087] . There is no statutory requirement for the Applicant to undertake informal consultation with the Council as part of the discharge of requirement process, however the Applicant is incentivised to do this to minimise risk of refusal.
WC-164	Issue Specific Hearing (ISH4): Draft Development Consent Order	Main Discussion Points	6.62. The council also notes that there is no stated obligation for the Applicant to maintain a Register of Requirements to alert the public, community and / or other stakeholders of the status of the documents and to allow visibility of the approved documents. This could either be incorporated into Schedule 16 or a	Please refer to the Applicant's Response to Second Written Questions, in particular DCO2.20 within the Applicant's Response to the Examining Authority's Second Written Questions [EN010168/EXAM/9.54] .

Reference	Theme	Issue	Comments	Applicant's Response
			separate requirement added into Schedule 2.	
WC-165	Issue Specific Hearing (ISH4): Action Point Responses	Action Point 2: Submit suggested wording as explained in oral hearing, with regards to 'maintenance' to be carried out within the parameters of the ES.	7.1. Wiltshire Council considers that Article 5(3) only acts to constrain "scheduled replacement" and "replacement" to the environmentally assessed parameters in the Environmental Statement (ES). This still leave a very broad definition of "maintain" that could permit whole-scheme replacement and re-powering by stages, that is not subject to appropriate development controls. 7.2. The council would suggest tightening the definition as follows (new wording in blue and underlined): "maintain" includes inspect, repair, adjust, alter, remove, refurbish, reconstruct, replace (including scheduled replacement of components of the authorised development where such replacement remains within the parameters assessed in the environmental statement and secured by the documents certified under article 42	Please refer to the Applicant's Response to Second Written Questions, in particular DCO2.4 within the Applicant's Response to the Examining Authority's Second Written Questions [EN010168/EXAM/9.54] .

Reference	Theme	Issue	Comments	Applicant's Response
			and the requirements) and improve any part of the authorised development, but does not include the removal, reconstruction or replacement of the whole of the authorised development other than such scheduled replacement where it remains within those assessed and secured parameters, and "maintenance" and "maintaining" are to be construed accordingly;	
WC-166	Issue Specific Hearing (ISH4): Action Point Responses	Action Point 4: Review alternative wording for Article 41, ensuring correct balance of when and when not to involve the council.	7.3. The council has set out the provisions that it considers necessary for this scheme below. However, it is accepted that these changes would likely result in changes to the management plans as well as Article 41 of the dDCO. 7.4. The council considers that all works affecting Category A and Category B trees, Ancient Trees, Veteran Trees, and trees protected by a Tree Preservation Order (TPO) should be appropriately monitored by the Arboricultural Clerk of Works (ACoW), recorded, and reported to	7.4: The Applicant considers that the activities identified by Wiltshire Council, including tree removal, canopy damage, root damage, hand digging and root pruning, and the installation of ground protection, are already subject to appropriate arboricultural oversight through the role of the ACoW and the mitigation secured within the Arboricultural Method Statement via Outline CEMP [REP4-049] . The Applicant does not consider it proportionate to require the routine monitoring activities of the ACoW to be formally recorded and reported to the

Reference	Theme	Issue	Comments	Applicant's Response
			the Local Planning Authority (LPA). This includes, but is not limited to: • Tree removal; • Canopy damage; • Root damage; • Hand-digging and root-pruning; and • Installation of ground protection.	Local Planning Authority, as this would duplicate the existing controls secured through the Development Consent Order and associated certified documents. In addition, the Applicant has responded to Wiltshire Council's concerns regarding operational tree management by amending the Outline Operational Environmental Management Plan [EN010168/APP/7.13] (Revision 6) to include a commitment that, where during operation a retained BS 5837:2012 Category A or Category B tree, or any veteran or ancient tree, is felled or removed for reasons including safety, disease, structural failure or other operational necessity, Wiltshire Council will be notified in writing within five working days. The notification will include the location and reference number of the tree, the reason for its removal, and the date on which the works were undertaken. This provides Wiltshire Council with appropriate visibility of any future removal of the highest value trees during

Reference	Theme	Issue	Comments	Applicant's Response
				the operational phase whilst avoiding a disproportionate reporting regime for routine arboricultural supervision. Accordingly, the Applicant considers that the combination of the AMS (secured via the Outline CEMP [REP4-049]) and the additional notification commitment within the Outline OEMP [REP4-051] provides a robust and proportionate framework for protecting retained trees throughout the construction and operational phases of the Proposed Development.
WC-167	Issue Specific Hearing (ISH4): Action Point Responses	Action Point 4: Review alternative wording for Article 41, ensuring correct balance of when and when not to involve the council.	7.5. Temporary compounds should be located outside the Root Protection Area (RPA) of trees and woodlands. This requirement should be consistent with the guidance relating to "Root loss / damage from excavation or soil compaction within RPAs" and shall take precedence over the requirements set out under "Tree Pruning" where there is any inconsistency.	The Applicant considers that this matter is already addressed through the existing commitments secured within ES Volume 3, Appendix 10-1 Arboricultural Impact Assessment and Outline Arboricultural Method Statement (OAMS) [APP-206] via the Outline CEMP [REP4-049] .

Reference	Theme	Issue	Comments	Applicant's Response
				The OAMS requires that temporary construction compounds are located outside the canopies and Root Protection Areas (RPAs) of retained trees wherever possible and identifies Temporary Construction Compounds as a potential source of arboricultural impact requiring appropriate control. The OAMS also sets out the measures to be applied where works are proposed in the vicinity of retained trees, including tree protection fencing, ground protection and Arboricultural Clerk of Works (ACoW) supervision where relevant. These commitments are reflected within the Outline CEMP [REP4-049], which secures the following embedded mitigation measures: temporary construction compounds will be sited outside the canopy spreads and RPAs of adjacent trees and woodlands;

Reference	Theme	Issue	Comments	Applicant's Response
				- retained trees will be protected through the installation of tree protection fencing where appropriate; - fit-for-purpose ground protection will be used where unavoidable access is required within RPAs; and - any excavation within RPAs will be undertaken using hand tools and supervised by the ACoW in accordance with the OAMS. The Applicant therefore considers that the management plans provide a clear and consistent hierarchy of mitigation which seeks to avoid impacts to retained trees in the first instance by locating temporary construction compounds outside RPAs, with additional controls applying only where works are unavoidably required in the vicinity of retained trees. The Applicant does not consider that further amendments are necessary, as the

Reference	Theme	Issue	Comments	Applicant's Response
				existing commitments already secure the outcome sought by Wiltshire Council.
WC-168	Issue Specific Hearing (ISH4): Action Point Responses	Action Point 4: Review alternative wording for Article 41, ensuring correct balance of when and when not to involve the council.	7.6. Proposed works or removal of any Category A or Category B tree, Ancient Tree, Veteran Tree, or tree protected by a TPO shall be notified in writing to the LPA prior to the commencement of the works.	The Applicant does not consider that a requirement to notify the Local Planning Authority prior to undertaking works to any Category A or Category B tree, Ancient Tree, Veteran Tree or tree protected by a Tree Preservation Order is necessary or proportionate. During the construction phase, works affecting retained trees will be undertaken in accordance with the approved Arboricultural Method Statement and Outline CEMP [REP4-049], under the supervision of a suitably qualified Arboricultural Clerk of Works (ACoW), with tree protection measures secured through the Development Consent Order. The Applicant therefore considers that appropriate controls are already in place to ensure that works are undertaken in accordance with the

Reference	Theme	Issue	Comments	Applicant's Response
				approved mitigation and do not require a separate prior notification process. During the operational phase, the Applicant has sought to address Wiltshire Council's concerns by introducing a commitment within the Outline Operational Environmental Management Plan [EN010168/APP/7.13] (Revision 6) requiring Wiltshire Council to be notified in writing within five working days where a retained BS 5837:2012 Category A or Category B tree, or any veteran or ancient tree, is felled or removed for reasons including safety, disease, structural failure or other operational necessity. The notification will include the location and reference number of the tree, the reason for the felling or removal, and the date on which the works were undertaken. The Applicant considers that this approach strikes an appropriate and proportionate balance. It ensures that Wiltshire Council is informed where the

Reference	Theme	Issue	Comments	Applicant's Response
				highest-value trees are removed during operation, whilst avoiding the need for advance notification and approval of routine or emergency tree works that are already subject to appropriate arboricultural supervision and existing statutory controls where applicable.
WC-169	Issue Specific Hearing (ISH4): Action Point Responses	Action Point 4: Review alternative wording for Article 41, ensuring correct balance of when and when not to involve the council.	Replacement Planting 7.7. Wiltshire Council should retain control over the species, size, specification and location of all replacement planting required in lieu of the removal of any Category A, B and / or protected trees. 7.8. A detailed replacement planting scheme should be submitted for approval to the LPA prior to commencement of works, demonstrating no net loss of tree canopy, landscape function or biodiversity value.	The Applicant does not consider that the additional approval mechanism proposed by Wiltshire Council is necessary or proportionate, as the Development Consent Order and the certified management plans already provide an appropriate level of control over replacement planting and long-term management. The Arboricultural Impact Assessment and Outline Arboricultural Method Statement (OAMS) [APP-206] identify where tree losses may occur and set out the principles for mitigation and compensation. These are supported

Reference	Theme	Issue	Comments	Applicant's Response
				by the Outline Landscape and Ecological Management Plan (OLEMP) [REP3-100], which secures the provision of replacement tree and woodland planting as part of the wider landscape, ecological and biodiversity mitigation strategy, and the Outline Environmental Protection and Management Strategy (OEPMS) [REP4-055], which establishes the framework for the delivery of environmental mitigation throughout the construction and operational phases. The detailed design of replacement planting, including species selection, planting specifications, locations and long-term management, will be developed following consent as part of the detailed Landscape and Ecological Management Plan (LEMP) and Environmental Protection and Management Strategy (EPMS). These documents are required to be submitted to and approved by the relevant planning authority pursuant to Schedule 2, Requirements 7 and 8 of

Reference	Theme	Issue	Comments	Applicant's Response
				the Draft DCO [REP4-004] before the relevant works can commence. The Applicant therefore considers that Wiltshire Council will already have the opportunity to review and approve the detailed replacement planting proposals through the approval of the detailed LEMP and EPMS. Requiring a separate approval process specifically for the species, size, specification and location of replacement planting associated with Category A, Category B and protected trees would duplicate these existing controls without providing any additional environmental benefit. Accordingly, the Applicant considers that the combination of the certified OLEMP, OEPMS and the approval mechanisms secured through Requirements 7 and 8 of Schedule 2 to the draft DCO provides a robust and proportionate framework to secure appropriate compensatory planting and its long-term management, and that no additional requirement is necessary.

Reference	Theme	Issue	Comments	Applicant's Response
WC-170	Issue Specific Hearing (ISH4): Action Point Responses	Action Point 4: Review alternative wording for Article 41, ensuring correct balance of when and when not to involve the council.	Post-Construction / HDD Monitoring 7.9. Clarification is required regarding the monitoring regime for retained trees following construction, particularly where Horizontal Directional Drilling (HDD) is proposed within or adjacent to Root Protection Areas (RPAs). 7.10. Post-construction monitoring should be undertaken by a suitably qualified arboriculturist for an agreed period to assess any delayed impacts on retained trees and identify remedial measures where necessary.	7.9: The monitoring regime will be provided in the detailed CEMP which will require the review and approval of Wiltshire Council. The Applicant and Wiltshire Council have agreed that a s106 and Post-Consent Planning Performance Agreement will be agreed that will facilitate post-consent monitoring consistently across the Scheme. 7.10: As stated in the Mitigation Route Map [EN010168/EXAM/9.59] all tree works will be undertaken by a suitably qualified arborist working in accordance with British Standard 3998:2010 Tree Work – Recommendations.
WC-171	Issue Specific Hearing (ISH4): Action Point Responses	Action Point 4: Review alternative wording for Article 41, ensuring correct balance of when and when not to involve the council.	Responsibilities for Planting and Maintenance 7.11. The Applicant should confirm: • Who will be responsible for implementing replacement planting.	The Outline LEMP [REP3-100] sets out the proposed ongoing General Management Prescriptions for all vegetation within the order Limits. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, which would be required to be substantially in

Reference	Theme	Issue	Comments	Applicant's Response
			• Who will be responsible for ongoing monitoring and maintenance. • The duration of the maintenance period. • The mechanism for replacing failed trees. 7.12. A condition should require that any tree which dies, is removed, becomes seriously diseased or fails to establish within the maintenance period is replaced with a tree of similar species, size and specification unless otherwise agreed by the Local Planning Authority.	accordance with the Outline LEMP [REP3-100], is secured through Requirement 7 in Schedule 2 of the Draft DCO [REP4-004].
WC-172	Issue Specific Hearing (ISH4): Action Point Responses	Action Point 4: Review alternative wording for Article 41, ensuring correct balance of when and when not to involve the council.	Updating Council Records 7.13. The Applicant should set out how Wiltshire Council will be notified of: • Tree removals undertaken. • Replacement planting completed. • Failures and subsequent replacements.	The notifications process will be provided with the Detailed Management Documents (CEMP, AMS etc.).

Reference	Theme	Issue	Comments	Applicant's Response
			7.14. Provision should be made for updating the council's tree asset and TPO records through the submission of as-built tree plans and monitoring reports.	
WC-173	Issue Specific Hearing (ISH4): Action Point Responses	Action Point 4: Review alternative wording for Article 41, ensuring correct balance of when and when not to involve the council.	Future Tree Preservation Orders (TPOs) 7.15. Clarification is required regarding the status of existing and future trees within the Order Limits during the operational life of the solar park. 7.16. The scheme should not prejudice the council's ability to make new Tree Preservation Orders where trees establish sufficient public amenity value during the lifetime of the development and the Applicant should be required to comply with the protections included therein. 7.17. The Applicant should confirm that access, management arrangements and operational requirements will not restrict the designation or protection of trees under future TPOs.	7.15 ES Volume 1, Chapter 10 Arboriculture [APP-062] has assessed and identified effects on existing trees. The Outline EPMS [REP4-055] then constrains the exercise of powers for tree removal in situations where TPOs are included on future trees within the Order Limits following granting of the DCO. 7.16 Please refer to page 20 Written Summary of the Applicant's Oral Submissions and Responses at Issue Specific Hearing 4 and Responses to Action Points [REP4-087]. The Applicant must have powers to remove trees subject to future TPOs to ensure certainty of delivery of the Scheme but these would be constrained by the EPMS. 7.18: The applicant notes this comment.

Reference	Theme	Issue	Comments	Applicant's Response
			7.18. Furthermore, as previously indicated, the council considers that the Arboricultural Impact Assessment and Arboricultural Method Statement should be certified under Schedule 13.	
WC-174	Issue Specific Hearing (ISH4): Action Point Responses	Action Point 5: Confirm which requirements the Council considers the phrase "substantially in accordance with" needs further justification.	7.19. The council can see the benefit of having the phrase "substantially in accordance with" included within certain Requirements, as it would afford all parties latitude for change outside the provisions set out within the outline management plans. This would especially be the case with regards to the Construction Environmental Management Plan, Operational Environmental Management Plan, Decommissioning Strategy and Construction Traffic Management Plan(s). 7.20. However, as expressed during the Hearing, the council's primary concern with the inclusion of the phrase "substantially in accordance with" is that it could erode the secured mitigation.	Please refer to Page 25 of the Written Summary of the Applicant's Oral Submissions and Responses at Issue Specific Hearing 4 and Responses to Action Points [REP4-087] . The Applicant has already provided the reasons why "substantial accordance" is appropriate. This has precedent in the recently made One Earth Solar Farm Order 2026.

Reference	Theme	Issue	Comments	Applicant's Response
			7.21. Therefore, the council requests justification from the Applicant on the inclusion of "substantially in accordance with" in relation to the following Requirements: • Requirement 7 – Landscape and ecological management plan; • Requirement 8 – Ecological protection and mitigation strategy; • Requirement 9 – Biodiversity net gain; • Requirement 11 – Surface and foul water drainage; and • Requirement 12 – Archaeology (the council acknowledges the Applicant's position as expressed at the Hearing in relation to this requirement). 7.22. It would also be helpful if the Applicant could explain if they consider there was the potential for the secured mitigation to be eroded should the drafting	

Reference	Theme	Issue	Comments	Applicant's Response
			remain as currently presented, and if not, why not.	
WC-175	Appendix A CAH1	Corrections to Book of Reference (BoR)	<u>Appendix A - Corrections to Book of Reference (CAH1).xlsm</u>	The Applicant acknowledges Wiltshire Council's submission and has addressed the matters raised in respect of the Book of Reference within the Applicant's response.
WC-176	Appendix B CAH1	Wiltshire Council's Preferred Protective Provisions for the Benefit of the Local Highway Authority	<u>Post Hearing Summaries and Action Points (Combined).pdf</u>	The Applicant acknowledges Wiltshire Council's submission and has addressed the matters raised within the Applicant's response.
WC-177	Appendix C ISH2	Action Point 16 Plans Illustrating Potential Panel Reduction to Reduce Impact of Norton Village Setting	<u>Post Hearing Summaries and Action Points (Combined).pdf</u>	The Applicant notes this submission.

Reference	Theme	Issue	Comments	Applicant's Response
WC-178	Appendix D ISH2	Action Point 19 Plan Illustrating Intra-Project Cumulative Sequential Road Routes for Visual Assessment	<u>Post Hearing Summaries and Action Points (Combined).pdf</u>	The Applicant notes this submission.
WC-179	Appendix E ISH3	Action Point 10 Plans Illustrating Required Highway Improvement Areas	<u>Post Hearing Summaries and Action Points (Combined).pdf</u>	The Applicant acknowledges Wiltshire Council's submission and has addressed the matters raised within the Applicant's response.

2.10 Christopher Koscielny

Table 2-10

Reference	Theme	Issue	Comments	Applicant's Response
CK-001	Transport and Access	HGV Trip Calculations	Having viewed some sections of the hearings and follow up requests made, I feel that the inspectorates focus should remain on the requirements of the Planning Acts. Hours of discussion have centred around the accuracy of the estimation of the number of thousands of HGV and support vehicle movements. Wiltshire council also still seem to be trying to obtain a comprehensive plan showing proposed road improvements! In the Project Information Booklet 2025, accompanying the public consultation, Lime Down stated - During the peak construction period, we estimate that there would be a maximum of 52 HGV deliveries per day, across the full extent of project site. (There is no reference made to any other service vehicles). We may also need to carry out minor highway improvement works. Lime Down also confirmed during the hearings,	Trip Generation calculations have been refined as further detail of the project has come forward. The Applicant has since submitted revised trip generation calculations in the same format as the SLD calculations at Deadline 5. This document is titled 'Highways Technical Note in Response to Appendix A of the SLD Deadline 4 submission' [EN010168/EXAM/9.64]. These calculations are currently being discussed with SLD's transport consultant. The full extent of proposed highway works are set out in Table 13-20 of ES Volume 3, Appendix 13-1:Transport Assessment [REP4-037] all of these works are located within the proposed DCO Order Limits.

Reference	Theme	Issue	Comments	Applicant's Response
			that their proposal was to use the only two possible routes to the sites. In which case, why did they fail to present realistic estimates for vehicle movements during the Public Consultation and no comprehensive details regarding the scale and extent of the proposed highway improvement works.	

2.11 Stop Lime Down

Table 2-11

Reference	Theme	Issue	Comments	Applicant's Response
CK-001	Transport and Access	HGV Trip Calculations	Having viewed some sections of the hearings and follow up requests made, I feel that the inspectorates focus should remain on the requirements of the Planning Acts. Hours of discussion have centred around the accuracy of the estimation of the number of thousands of HGV and support vehicle movements. Wiltshire council also still seem to be trying to obtain a comprehensive plan showing proposed road improvements! In the Project Information Booklet 2025, accompanying the public consultation, Lime Down stated - During the peak construction period, we estimate that there would be a maximum of 52 HGV deliveries per day, across the full extent of project site. (There is no reference made to any other service vehicles). We may also need to carry out	Trip Generation calculations have been refined as further detail of the project has come forward. The Applicant has since submitted revised trip generation calculations in the same format as the SLD calculations at Deadline 5. This document is titled 'Highways Technical Note in Response to Appendix A of the SLD Deadline 4 submission [EN010168/EXAM/9.64]. These calculations are currently being discussed with SLD's transport consultant. The full extent of proposed highway works are set out in Table 13-20 of ES Volume 3, Appendix 13-1:Transport Assessment (Rev 4) [REP4-037] all of these works

Reference	Theme	Issue	Comments	Applicant's Response
			minor highway improvement works. Lime Down also confirmed during the hearings, that their proposal was to use the only two possible routes to the sites. In which case, why did they fail to present realistic estimates for vehicle movements during the Public Consultation and no comprehensive details regarding the scale and extent of the proposed highway improvement works.	are located within the proposed DCO Order Limits.

2.12 Caroline Moore

Table 2-12

Reference	Theme	Issue	Comments	Applicant's Response
CM-001	Description and DCO Process Landscape and Visual	Scheme Details	We've been told by the applicant and by DESNEZ that our feedback is welcome. That the fears and objections of local communities will be taken into consideration. But we have seen little evidence of this. When we've asked detailed questions, we've been met with silence or been referred to microscopic	The Applicant does not agree that essential details of the Scheme, including the on-site cable routing, have been omitted from the application documentation.

Reference	Theme	Issue	Comments	Applicant's Response
			references buried deep within mountains of highly technical documentation. Essential details on issues such as the location and size of the cable, and the visual impact of the solar panels have been conspicuous by their absence.	The Scheme is described in detail within ES Volume 1 Chapter 3 (The Scheme) [APP-055], together with the accompanying Works Plan [REP3-004], Design Principles and Parameters [REP4-043] and other certified application documents. These documents explain the location and extent of the principal project components, including the underground electricity cable network. The underground cable network would be installed within the on-site cable corridors shown on the Works Plan [REP3-004]. These corridors identify the areas within which the cables may be routed during detailed design. A single fixed alignment has not been identified at this stage because the final route will be refined following detailed engineering design, ground investigations and consideration of environmental and technical constraints. This approach provides flexibility to avoid or minimise impacts where reasonably practicable, for example by

Reference	Theme	Issue	Comments	Applicant's Response
				routing around existing trees, hedgerows, drainage features, utilities, ecological constraints and archaeological features, whilst remaining within the assessed Order Limits and cable corridors. With regards to the visual impact of the panels, the Applicant has undertaken an LVIA in ES Volume 1, Chapter 8: Landscape and Visual [REP3-025] which has considered the appropriate and relevant guidance and robustly assesses both the landscape and visual effects of the Scheme independently to ensure both the impacts and effects on the fabric and character of the landscape are taken into account as well as the views and visibility. The LVIA acknowledges that as a consequence of the Development, there would be significant adverse effects to Landscape Character and visual amenity.

Reference	Theme	Issue	Comments	Applicant's Response
				However, NPS EN-1 recognises at para 5.10.5 that <i>"Virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape, but there may also be beneficial landscape character impacts arising from mitigation."</i> and at Para 5.10.13 that <i>"All proposed energy infrastructure is likely to have visual effects for many receptors around proposed sites."</i>

2.13 Geoffrey Phillips

Table 2-13

Reference	Theme	Issue	Comments	Applicant's Response
GP-001	Description and DCO Process	General Remarks	Good afternoon, my name is Geoffrey Philipps. I live in [redacted]. I am fully retired, so spend much of my time in our garden, with its 300 m frontage to Gauze Brook and footpath MALW51 allowing me to put flesh on some excellent points raised at the first Open Floor Hearing in April.	The Applicant notes this comment.
GP-002	Hydrology, Flood Risk and Drainage	Flooding	Reference was made to Storm Bert in November 24 – not an isolated event – nor a 1 in 30-year event – the Brook flooded some 17 times that winter, using the full extent of the flood plain immediately west of Corston on each occasion– a typical winter. The increased run off identified by Prof Skeffington will increase the speed at which the waters rise. The choke point, the A429 bridge, will be overwhelmed	The Applicant acknowledges the reported frequency of flooding from Gauze Brook during winter 2024/25. However, observations of individual flood events do not establish their return period or demonstrate that the Scheme would increase the frequency or severity of flooding at Corston. Flood risk associated with Gauze Brook has been assessed through ES Volume 1, Chapter 11: Hydrology, Flood Risk and

Reference	Theme	Issue	Comments	Applicant's Response
			more often, raising the flood level and creating increased risk for residents of Corston. The Lime Down development would render still born any thoughts on flood alleviation by the local council.	Drainage [REP4-012], ES Volume 3, Appendix 11-6: Flood Risk Assessment and Outline Drainage Strategy, Lime Down D / BESS [REP4-031] and the site-specific hydraulic modelling. The assessment considers the existing floodplain and the potential effect of the Scheme on flood levels and flows. Solar panels would remain elevated above the ground and would not form a connected impermeable drainage catchment. Although rainfall may be redistributed locally beneath the panels, this does not result in a material increase in runoff at the field boundary where ground cover, soil condition, compaction and flow pathways are appropriately managed. These matters are controlled through the Scheme design, the Outline CEMP [REP4-049], the Outline SRMP [REP4-053] and detailed drainage design

Reference	Theme	Issue	Comments	Applicant's Response
				secured through Requirement 11 of the Draft DCO [REP4-004]. The assessment does not identify a material increase in flood risk at Corston or a greater frequency of the A429 bridge being exceeded as a result of the Scheme. No evidence has been provided to demonstrate that the Scheme would prevent or prejudice any future flood alleviation proposals promoted by the local authority.
GP-003	Socio-Economics, Tourism and Recreation	Footpaths	Our idyllically rural Footpath with its long open views and grazing livestock is a significant recreational asset for the wellbeing of locals and visitors alike. Year-round I estimate 20-30 groups pass by our garden daily on average. The number varies with weather and season, exceeding perhaps 100 on a fine summer's weekend: families, dog walkers, cyclists, hikers and horse riders.	The Applicant notes this comment and refers to the responses provided to 'GP-002' and 'GP-003' in the Written Summary of the Oral Submissions at the Open Floor Hearing 2 and the Applicants Responses [REP4-088]. The LVIA in ES Volume 1, Chapter 8: Landscape and Visual [REP3-025] recognises the change to the visual amenity and associated adverse effects to users of those PRow that

Reference	Theme	Issue	Comments	Applicant's Response
			This Footpath leads into HULL7 and HULL6, both set to close during construction, eroding the main benefit of MALW51 and cutting off both 45-minute circular routes back to Mill Lane which we, like others in Corston, walk many times a week. After completion large sections of footpath will be hemmed in by 2.5 metre deer fencing. The Forestry Commission recommends 1.5m for Fallow, Roe and Muntjac, the only indigenous deer species in this part of the country - so why the necessity for the higher fence? The Alcatraz feeling will be heightened by the proposed hedging. The proper creation and maintenance of a native species, 4.5m high hedge is, to say the least, challenging, expensive and will take years to achieve. The tendency will be to cut corners and those plants that do survive will be let grow thin at the	are located within the array itself or directly adjacent. The design of the scheme has embedded buffers into the proposed layout, specifically a 15m offset to any proposed infrastructure on either side of any PRow. Where PRow directly cross the array, this creates a corridor with a minimum width of 30m wide between proposed fencelines through the array. There would then be a gap of 4m between the fence line and the proposed panels resulting in a minimum total width of 38m between the panels where PRow cross the arrays. The LVIA acknowledges that as a consequence of the Development, there would be significant adverse effects to Landscape Character and visual amenity.

Reference	Theme	Issue	Comments	Applicant's Response
			bottom, rendering any screening ineffective.	The Outline LEMP [REP3-100] sets out the proposed ongoing General Management Prescriptions for all vegetation within the order Limits, including hedgerows. However, NPS EN-1 recognises at para 5.10.5 that <i>"Virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape, but there may also be beneficial landscape character impacts arising from mitigation."</i> and at Para 5.10.13 that <i>"All proposed energy infrastructure is likely to have visual effects for many receptors around proposed sites."</i>
GP-004	Noise and Vibration	Noise Impact	Add to this the constant hum of tracker panels and inverters destroying any sense of space or solitude. The countryside around will be turned into a no-go area for recreation and well-being.	While there could be faint humming close to the infrastructure, this would, with reference to ES Volume 1, Chapter 14 Noise and Vibration [REP1-021] , be below existing sound levels most of the time across much of the local area.

Reference	Theme	Issue	Comments	Applicant's Response
				Tracker panel systems are designed to rotate panels gradually to follow the path of the sun. Their movement is intermittent, slow and typically limited to daylight hours. As such it is the Applicant's view that the countryside would remain suitable for recreation and well-being from a noise perspective.
GP-005	Construction and Decommissioning	Decommissioning	If the project obtains consent; irrespective of it being completed or not, the area will be blighted for ever, there being no effective incentive for decommissioning. I am fully committed to renewable energy; I drive an all-electric car and installed a ground PV array in our garden. That said, I view Lime Down as ill-conceived, badly designed and wrongly located, all without any concern for local stakeholders and would urge that its application be rejected.	Should consent be granted, the Scheme would be subject to legally binding conditions, including requirements for decommissioning at the end of the operation and maintenance phase. At this stage, the land would be returned to its original use and condition as far as practicable. This is confirmed in the Outline Decommissioning Strategy [REP3-096] and secured by Requirement 20 in Schedule 2 of the Draft DCO [REP4-004].

Reference	Theme	Issue	Comments	Applicant's Response
				The Applicant has engaged with local stakeholders prior to submission and continues to do so throughout the Examination phase.
GP-006			Deer fencing document for review: EN010168-002171-Geoffrey Philipps COMBINED_Redacted.pdf	The Applicant notes this comment. The Scheme parameters relating to deer fencing are set out in the Design Principles and Parameters [REP4-043] where it states that the maximum height is 2.5m and that fencing will comprise deer wire mesh and wooden post security fence with wooden posts. As requested by Wiltshire Council, the wooden posts will be round in section and agricultural in appearance. The Applicant is required to provide further details, for approval by the relevant planning authority, in relation to fencing in order to discharge Requirement 10 'Fencing and other means of enclosure' of the Draft DCO [REP4-004].

2.14 KMT Farming and Consultancy on behalf of Mr and Mrs Eavis

Table 2-14

Reference	Theme	Issue	Comments	Applicant's Response
KMTE-001	Description and DCO Process	Introductory Remarks	This document summarises the oral representations made on behalf of Mr and Mrs Eavis at the Compulsory Acquisition Hearing on 30 June 2026. It should be read alongside the Deadline 3 written representations. Mr and Mrs Eavis are the owners of Manor Farm, Corston — a 415-acre arable and sheep farm near Malmesbury. They object to the compulsory acquisition and temporary possession powers sought over their land. Their position is that those powers are disproportionate, inadequately justified, and that the true impact on the farm business has not been properly assessed or presented to the Examination.	The justification for compulsory acquisition powers is set out in the Statement of Reasons [APP-018] and was also set out during CAH1 Written Summary of the Applicants Oral Submissions and Responses at Compulsory Acquisition Hearing 1 and Responses to Action Points [REP4-084]. A further response from the Applicant specifically in relation to Mr and Mrs Eavis can be found in Action Point 4 of Written Summary of the Applicants Oral Submissions and Responses at Compulsory Acquisition Hearing 1 and Responses to Action Points [REP4-084].
KMTE-002	Site Selection and Alternatives	Scale of Impact	Directly within the Order Limits: approximately 69 acres — ~30 acres north of the A429 in plot 05-043 (Works 5B and 8A) and ~39 acres south of the	Plots 05-043 and 06-001 to 06 006 can be found in the Land Plan [REP1-004] where the Applicant has shown the

Reference	Theme	Issue	Comments	Applicant's Response
			A429 in plots 06-003 to 06-006 (Works 5B and 8B). This represents approximately 17% of the farm. Severed land outside the Order Limits but directly affected: approximately 41 acres — ~13 acres north of the A429 and ~28 acres south — cut off and unmanageable throughout construction and the operational period. In total, approximately 110 acres — over a quarter of Manor Farm — will be directly affected or severed. This figure has not been adequately presented in the Applicant's CA case. Proportionality cannot be assessed on an incomplete account of the impact. The Examining Authority noted at the hearing that the five-year window for exercising compulsory acquisition powers affects the Owners' investment decisions. The Owners submit that this immediate effect on the farm business — arising from the moment of grant, before any notice is	Affected Party (AP) land in blue, over which new rights are being sought. The occupation of the land will be temporary, with permanent rights required in order to operate and maintain the proposed development, as well as decommission. The Applicant does not consider any of the agricultural land to be severed, and where areas of land would be temporarily inaccessible during construction, these will be managed and mitigated through accommodation works, such as crossing points. This has previously been discussed with the AP's land agent. There will be full reinstatement of the cable trenches to ensure agricultural operations can continue following completion of construction, and throughout the operational phase. Further detail relating to the reinstatement can be found in the Outline CEMP [REP4-049].

Reference	Theme	Issue	Comments	Applicant's Response
			served — must be fully weighed in the CA justification assessment.	
KMTE-003	Site Selection and Alternatives	Cable Route Impact on Land	The breadth of rights — Works 5B and 8A (north — plot 05-043) and Works 5B and 8B (south — plots 06-003 to 06-006) The Owners submit that in practice they are not being asked for a cable easement and a temporary access track. They are being asked to provide rights sufficient to construct, operate and decommission a large industrial development — the Lime Down Solar Farm — across a significant part of their farm.	The Applicant refers to the Draft DCO [REP4-004] and Book of Reference [REP3-009] which outlines the rights sought over plots 05-043, 06-003 and 06-006. The Applicant considers the extent of rights sought to be required to construct, operate and maintain the Scheme with further justification set out in the Statement of Reasons [APP-018]. The Applicant has also explained the rights being sought at great length with the Affected Party's land agent, the detail of which can be found in the Land and Rights Communication Log [REP4-076] and the Land and Rights Negotiations Tracker [REP4-008].
KMTE-004	Construction and Decommissioning	Cable Route Impact on Land – Works 5B	Work 5B — cable works and construction rights (north and south)	In relation to the construction and decommissioning works referenced in Work No. 5B(v), those works are only for the construction and decommissioning

Reference	Theme	Issue	Comments	Applicant's Response
			Work 5B applies to plot 05-043 (north of the A429) and to plots 06-003 to 06-006 (south of the A429), authorising the installation of cables up to 132kV across all affected plots. It is not, however, simply a cable-laying right. Work 5B is the primary source of concern because it expressly authorises, in addition to the cable itself, the full suite of construction and decommissioning laydown area infrastructure set out below. These rights are exercisable at any time throughout the project life — including for operational maintenance and at decommissioning — and are not limited to the initial construction phase. • Areas of hardstanding, compacted ground or track matting; • Car parking and material storage; • Site and welfare offices and workshops; • Security infrastructure — cameras, perimeter fencing and lighting;	phases of the Scheme for the purposes of Work No. 5B. Work No. 7 provides the Applicant with the general power for temporary construction and decommissioning laydown areas for the Scheme and the areas this applies to are detailed on the Works Plan [REP-3-004]. For maintenance, the Applicant refers to Part 5 of the Draft DCO [REP4-004] which states if compulsory acquisition powers were to be exercised, then the temporary use of land for maintaining the authorised development is restricted to the maintenance period (Article 32), being five years beginning from the date of final commissioning. Article 32(4) states that the Applicant may only remain in possession of land for so long as may be reasonably necessary to carry out the maintenance of the part of the Scheme for which possession of the land was taken. So, although the right can be exercised at any time during the maintenance period, the Applicant can

Reference	Theme	Issue	Comments	Applicant's Response
			• Site drainage and waste management infrastructure including sewerage; • Electricity, water, wastewater and telecommunications connections. This is the critical point on Work 5B. These laydown and compound rights are described in the DCO as "temporary construction and decommissioning" rights. The Owners draw the Examining Authority's attention to a fundamental distinction that the Applicant has not addressed: even if the physical works carried out under those rights are temporary in nature and the equipment is removed after construction, the rights themselves are permanent and exercisable at any time throughout the 60-year project life. They may be required for operational maintenance, for replacement activities, or for decommissioning at an undefined point in the future. Their existence as easements — not merely their active exercise — constitutes an	only stay on the land for the time that is necessary to carry out the maintenance. Powers for decommissioning are necessary as the 132kV cables may be left in situ or taken up, and the option will depend on government policy and good practice at the time Outline Decommissioning Strategy [REP3-096].

Reference	Theme	Issue	Comments	Applicant's Response
			immediate and lasting burden on the farm from the date of grant.	
KMTE-005	Construction and Decommissioning	Cable Route Impact on Land – Works 8A/8B	Work 8A (north — plot 05-043) and Work 8B (south — plots 06-003 to 06-006) — access and road works Work 8A (plot 05-043, north of A429) authorises works to facilitate permanent access to Work Nos. 1 to 6 and 9 to 10, including creation of accesses, visibility splays, highway alterations, and works in connection with the movement of abnormal indivisible loads. Work 8B (plots 06-003 to 06-006, south of A429) authorises the same suite of access and highway works, including permanent road construction. Miss Broderick confirmed at the hearing that Work 8B provides the access route for the movement of solar panels to the eastern site and for replacement activities during the operational period — specifically to avoid routing traffic through the nearby village.	The Applicant confirms the access route marked 18 on the Access Plan [APP-010] through plots 06-003 and 06-006 is required to facilitate the construction of Lime Down E. Following completion of construction, the access route will be removed and the agricultural land reinstated. The Applicant is seeking to retain the right to construct an access route for decommissioning of the wider project if required but does not require a permanent access road through the plots for the lifespan of the project.

Reference	Theme	Issue	Comments	Applicant's Response
			This confirmation is significant. Work 8B was described in the Applicant's case as access infrastructure. Its confirmed purpose — serving the whole solar development throughout operation — demonstrates that the rights over Manor Farm go well beyond what would be required for a cable easement alone. The Owners repeat their submission that these rights, taken together with Work 5B, are more appropriately characterised as rights to construct, operate and decommission a large industrial development across a working farm.	
KMTE-006	Scheme Description and DCO Process	Previous Questions to Applicant	The three questions and the answers received 1. Are all of the rights sought in plots 05-043 and 06-003 to 06-006 necessary? The Applicant's response confirmed that Work 8B serves the whole solar development, not only cables. This is inconsistent with the characterisation of the impact as a	1. The necessity of the rights sought is outlined with justification of the Scheme in Section 7 of the Statement of Reasons [APP-018]. The Applicant has responded to the point on Work No. 8B in response KMTE-005 of this document. 2. The duration of the rights are sought in perpetuity as it is not possible to acquire rights by compulsion on a temporary basis.

Reference	Theme	Issue	Comments	Applicant's Response
			narrow cable easement and raises a proportionality question the Applicant has not resolved. 2. What is the duration of the rights and at what stages will they be utilised? The Applicant confirmed that the permanent road (Work 8B) will be used during the operational period for panel replacement and maintenance. The five-year CA exercise window was confirmed. However, the question of whether Works 5B and 8A (north) and Works 5B and 8B (south) rights over Manor Farm persist for the full project life — and in what form — was not clearly answered. 3. What is the total anticipated project life? 60 years was confirmed. The Owners note that permanent easement rights over a working farm for up to 60 years have not been reflected in the Applicant's	3. The project life from when the solar farm starts generating electricity is 60 years, which is confirmed in Requirement 20 of the Draft DCO [REP4-004]. The Applicant clarifies that evidenced business losses will be compensated in line with the provisions of the Land Compensation Act 1961 and the Land Compensation Act 1973.

Reference	Theme	Issue	Comments	Applicant's Response
			assessment of impact on the farm business.	
KMTE-007	Description and DCO Process	DCO Documentation	DCO provisions on proportionality — the Examining Authority's request The Examining Authority asked Miss Broderick to signpost where in the DCO documentation the "checks and balances" on the exercise of these powers are located — that is, the specific provisions that ensure the rights are exercised proportionately and do not impose a greater burden than necessary. The Owners align themselves with that request. It was not addressed in the Applicant's posthearing action points and remains outstanding. The Owners respectfully ask the Examining Authority to confirm that this question has been formally noted as an action for the Applicant and to require a written response identifying:	Plots 05-043 (north of the A429) and to plots 06-003 to 06-006 are subject to the Acquisition of Rights, as set out in the Land and Rights Negotiations Tracker [REP4-008]. The specific DCO Articles that qualify the exercise of compulsory acquisition rights can be found in Part 5 of the Draft DCO [REP4-004]. Of most relevance to Mr and Mrs Eavis are Article 24 (Compulsory acquisition of rights), Article 25 (Private rights) and Article 32 (Temporary use of land for maintaining the authorised development). An explanation of these Articles and the related Schedules can be found in the Explanatory Memorandum [REP4-006].

Reference	Theme	Issue	Comments	Applicant's Response
			• The specific DCO articles, schedules or conditions that limit or qualify the exercise of Works 5B and 8A rights over plot 05-043 and Works 5B and 8B rights over plots 06-003 to 06- 006; • How those provisions ensure that the compound, laydown, and access rights under Work 5B are not exercised beyond what is genuinely necessary during the operational period; • Whether any management plan or outline document contains enforceable commitments specific to Manor Farm that control the manner and timing of exercise of these rights. Until those provisions are identified, the Owners' position is that the assurance given at the hearing — that "checks and balances" exist — is not sufficient. Assurances given orally at a hearing are not a substitute for enforceable DCO provisions, and the Owners and the	Further information on the powers of the DCO was also explained in Section 2 of the Written Summary of the Applicants Oral Submissions and Responses at Compulsory Acquisition Hearing 1 and Responses to Action Points [REP4-084] which included an explanation of Articles and Schedules. The process of how the Draft DCO [REP4-004] works in relation to Work No. 5B is explained in Reference KMTE-004 of this document. The outline management plans, such as the Outline CEMP [REP4-049], Outline OEMP [REP4-051] and Outline Decommissioning Strategy [REP3-096] are designed to demonstrate the mitigation activities that are relevant to each phase for the Scheme as a whole, rather than to address compulsory acquisition queries.

Reference	Theme	Issue	Comments	Applicant's Response
			Examining Authority are entitled to know precisely where those provisions are.	Information on compulsory acquisition is set out in the Draft DCO [REP4-004] and the compulsory acquisition documents, which include the Statement of Reasons [APP-018] , the Book of Reference [REP3-009] and the Land and Rights Negotiations Tracker [REP4-008] .
KMTE-008	Consultation and Engagement	Previous Engagement	Engagement, impact on the farm business, and wider concerns The Owners have engaged constructively throughout. Despite that, they have not received a coherent and consistent account of what is genuinely required from this landholding. The breadth of rights sought in the DCO and what has been communicated in voluntary discussions remain irreconcilable. That inconsistency is not a peripheral concern — it goes to the heart of whether the engagement obligation has been met and whether the impact on the farm business has been properly assessed.	Engagement The Applicant, and their appointed representative land consultant, Dalcour Maclaren have held and continue to have productive discussions with the respondent. The Applicant has consulted affected parties in accordance with the requirements of the Planning Act 2008 and the Consultation Report [APP-022] details this.

Reference	Theme	Issue	Comments	Applicant's Response
KMTE-009	Socio-Economics, Tourism and Recreation	Impacts on Farming Business	Impact on the farming business. The general principles of running a farming business will be severely impacted by the existence of these rights. The following illustrates the breadth of that impact, but is not exhaustive: • Agri-environment schemes. The farm is in Countryside Stewardship and the Sustainable Farming Incentive. Physical interference with the affected land triggers clawback and penalty provisions under those schemes. That risk arises from the moment works begin and cannot be planned around without clarity on programme and phasing — clarity the Applicant has not provided. • Operational and investment decisions. The existence of permanent compulsory rights over a quarter of the farm makes rational capital investment decisions impossible. Drainage improvements, farm infrastructure, machinery investments, and building works on or near the affected land cannot sensibly be committed to	Agri-environment schemes It is the responsibility of the respondent to apply to the Rural Payments Agency for a temporary derogation over land within agri-environment schemes and to demonstrate through evidenced losses that compensation is payable. Operational and investment decisions The Applicant acknowledges that whilst there will be a temporary impact to agriculture during construction, following completion, land along the cable route will be reinstated and available for its former use. As such, the Scheme is not anticipated to have any significant effect on long-term operational and investment decisions, as long as they do not conflict with the protective provisions being sought over the Grid Connection Cable, which would prevent buildings or tree planting etc. over the Grid Connection Cable.

Reference	Theme	Issue	Comments	Applicant's Response
			whilst the extent, timing, and duration of the Applicant's rights remain undefined. The farm is effectively placed in a state of enforced uncertainty from the date of DCO grant. Long-term environmental and commercial proposals. Any medium or long-term proposals for the farm — carbon offsetting schemes, nutrient neutrality credits, biodiversity net gain delivery, or other diversification, development or environmental enhancement projects — would require certainty of land use and security of tenure over the affected area for the duration of those commitments. The existence of permanent compulsory rights that may be exercised at any time makes those proposals impossible to progress, finance, or deliver. These are not marginal opportunities — they represent the emerging commercial and environmental future of farm businesses of this type, and their loss is a	The Scheme's infrastructure has been designed to minimise impacts on above ground receptors, including agricultural land. The Applicant is seeking to jointly instruct an independent drainage consultant to undertake an assessment of existing drainage systems by carrying out an initial walkover survey prior to construction. The investigations will inform the pre- and post-construction drainage design and identify if alterations are required to be made to the existing drainage system.

Reference	Theme	Issue	Comments	Applicant's Response
			direct and material consequence of the rights sought. • Succession and financing. Succession planning and any financing secured against the affected land are immediately complicated by the existence of permanent, at-any-time compulsory powers on title. These are not future concerns — they arise from the date of grant. None of these impacts has been assessed or addressed in the Applicant's CA case. The Examining Authority's own question at the hearing invited evidence of this nature. The Owners submit that the impact on the farm business must be assessed on a whole-farm basis, across the full 110- acre affected area, and on the basis of what the rights actually authorise — not what the Applicant says it expects to need in practice. The Examining Authority observed that affected persons who defer engagement may lose the opportunity to secure site-	

Reference	Theme	Issue	Comments	Applicant's Response
			specific protections in management plans. The Owners acknowledge that observation and remain willing to engage. However, meaningful engagement requires the Applicant to provide a coherent and consistent account of what it genuinely requires from Manor Farm — which requires, as a first step, resolution of the Work 5B rights duration question and the signposting exercise the ExA requested.	
KMTE-010	Description and DCO Process	Compulsory Acquisition	Why the CA case has not been made The three legal tests under section 122 of the Planning Act 2008 have not been satisfied in respect of Manor Farm. The position is this: Either the land and rights sought are disproportionate to what this scheme genuinely requires from this landholding — in which case the Order Limits should be redrawn and the rights refined to reflect the true minimum necessary.	The Applicant is confident that the legal tests under section 122 of the Planning Act have been met. The Applicant's justification is set out in full in the Statement of Reasons [APP-018]. The Statement demonstrates that the inclusion of powers of compulsory acquisition in the Order for the purposes of the Scheme meets the requirements of Section 122 of the PA 2008 as well as the considerations in the CA Guidance.

Reference	Theme	Issue	Comments	Applicant's Response
			Or the rights accurately reflect what constructing, operating and decommissioning this development will demand — in which case the full scale of that impact on Manor Farm, including the permanent burden created by the existence of these easements over 60 years or more, has not been adequately assessed or presented to this Examination. On either analysis, the CA case fails. The Applicant cannot characterise the impact as a narrow cable easement whilst simultaneously confirming that the permanent road (Work 8B) serves the whole solar development, and that compound and laydown rights under Work 5B are exercisable at any time for the full project life.	The Applicant also explained its case for compulsory acquisition and temporary possession, including how it has met the legal tests required of the Planning Act 2008, in section 2 of the Written Summary of the Applicants Oral Submissions and Responses at Compulsory Acquisition Hearing 1 and Responses to Action Points [REP4-084]. In regards to Work No.s 5B and 8B, these have been addressed in references KTME-005 and KTME-007 of this document.
KMTE-011	Consultation and Engagement	Engagement	Engagement. The Owners also draw the Examining Authority's attention to a concern about the overall approach to engagement. The Applicant is obliged to demonstrate it has taken all reasonable	The Applicant, and their appointed representative land consultant, Dalcour Maclaren have held and continue to have productive discussions with the respondent.

Reference	Theme	Issue	Comments	Applicant's Response
			steps to acquire land and rights by agreement. The Owners have engaged throughout and the exchanges are documented. However, engagement that proceeds on the basis of a materially different picture of the requirement — suggesting something of far lower impact than the DCO actually authorises — cannot satisfy that obligation. The Owners are concerned that the Applicant may, whether inadvertently or otherwise, be relying on the significant weight attached to solar energy as critical national infrastructure to avoid the scrutiny that the breadth of these rights properly demands. Describing what amounts to the full construction, operation and decommissioning rights for a large industrial development as a cable easement and temporary access track, and engaging with landowners on that basis, does not constitute genuine engagement with the true scope of the CA powers being sought. The Examining Authority should require the Applicant to	The Applicant has consulted affected parties in accordance with the requirements of the Planning Act 2008 and the Consultation Report [APP-022] details this. In regard to discussions and negotiations for Heads of Terms, these have been ongoing with the respondent's professional representation since June 2025. Prior to the issue of populated Heads of Terms, the Applicant provided the respondent's agent draft Heads of Terms and requested feedback. On 10 November 2025 the Applicant received confirmation from the respondent's agent that the Heads of Terms were agreeable for signing.

Reference	Theme	Issue	Comments	Applicant's Response
			confirm that its engagement with landowners on the cable route has been conducted on the basis of the full extent of the rights in the DCO — not a reduced or partial account of them.	
KMTE-012	Description and DCO Process	Summary of Questions to the Applicant	The Owners ask the Examining Authority to require the Applicant to: 1. Confirm whether Works 5B and 8A (plot 05-043) and Works 5B and 8B (plots 06-003 to 06-006) rights over Manor Farm persist for the full 60-year project life, and to provide a plot-by-plot breakdown of which rights are exercisable at each stage — construction, operation and decommissioning. 2. Identify the specific DCO provisions that constitute the “checks and balances” on the exercise of these rights — in direct response to the Examining Authority’s request at CAH1, which was not captured in the post-hearing action points. 3. Confirm that its engagement with landowners on the cable route has been	1. The rights are sought for the duration of the Scheme and are shown on the Land Plan [REP1-004]. For the plots in the comment, the rights being applied for are the same, which is described in the Land Plan [REP1-004] as “<i>New rights (including restrictions) to be compulsorily acquired and temporary use of land and in relation which it is proposed to suspend or extinguish easements, servitudes and other private rights</i>” 2. The specific DCO provisions relevant to compulsory acquisition are listed at reference KMTE-007 of this document. 3. Throughout negotiations for Interconnecting Cable Routes and the Cable Route Corridor, the Applicant has progressed the Heads of Terms, and associated rights sought over those

Reference	Theme	Issue	Comments	Applicant's Response
			conducted based on the full extent of the rights in the DCO, not a partial or reduced account of them, and to confirm that all affected landowners have been shown the full rights schedule under Work 5B. 4. Assess the impact on Manor Farm based on the full 110-acre affected area — including the 41 acres of severed land — and address the full range of farm business impacts set out in section 6 above. 5. Not accept the CA case as made out in respect of plots 05-043 and 06-001 to 06-006 until the above matters are resolved.	specific plots whilst viewing the Works Plans in parallel. The Works Plans and schedule of Works Descriptions have been in the public domain and accessible to all parties since October 17th 2025. The Applicant has signposted AP's and their land agents to those Works Plans where required. 4. As previously stated in reference JRE-009 of the Applicant's Response to Submissions Received at Deadline 2 [REP3-129] the Applicant has sought to minimise land take of the Scheme, which is why the additional acres have not been included in the Scheme design. The Applicant is confident that there would not be a long-term significant adverse effect on this farming business (reference JRE-003 of the Applicant's Response to Submissions Received at Deadline 2 [REP3-129]).

Reference	Theme	Issue	Comments	Applicant's Response
				5. As previously stated in Action Point 4 of the Written Summary of the Applicants Oral Submissions and Responses at Compulsory Acquisition Hearing 1 and Responses to Action Points [REP4-084] the Applicant confirms that all rights sought over 05-043 and 06-001 to 06-006 are necessary and satisfy the statutory tests for compulsory acquisition set out within the Statement of Reasons. The Applicant refers to the explanation given during CAH1 as to how the powers would be exercised.

2.15 Chippenham Without Parish Council

Table 2-15

Reference	Theme	Issue	Comments	Applicant's Response
CWPC-001	Description and DCO Process	Wiltshire Council Highway Officers	The Parish Council has responded to all statutory consultations to date and has expressed local concerns on a broad range of issues. What is unknown is whether Wiltshire Council Highway Officers and others have investigated specific local aspects and arising implications or whether matters of detail have been left to later stages in this process should the Secretary of State consider that the Project can proceed. With this in mind the Parish Council has agreed that they should be proactive in raising areas of local concern at this time so that all are mindful of Parish views that need to be addressed at the appropriate time.	The Applicant notes this comment and has been engaging with Wiltshire Council Highway Officers and other parties to understand any matters of concern regarding the Scheme.
CWPC-002	Site Selection and Alternatives	Cable Route and Infrastructure Requirements	The Council is concerned about two particular aspects that have severe highway implications for the Parish that	As shown on ES Volume 2, Figure 3-2: Key Construction Phase Features [REP3-036] , there are seven

Reference	Theme	Issue	Comments	Applicant's Response
			relate to the favoured cable route from the solar park to the grid connection at Melksham. This route would run through parts of the western boundary of the Parish affecting also the adjoining Yatton Keynell, Biddestone and Corsham Parishes. It is understood that to support the cable laying activity it is planned to have two operation support sites for managing the excavations, and the parking and maintenance of plant and trucks. The Parish Council considers that these are major infrastructure requirements for the whole Project	Temporary Construction Compounds, which include the two within Chippenham without Parish. Information on what the Temporary Construction Compounds comprise is set out within ES Volume 1, Chapter 3: The Scheme [APP-055].
CWPC-003	Transport and Access	Fowlswick Lane Site Access	One site is within the Parish in the field bordered by Fowlswick Lane and the B4039, the through route from the A420 to Yatton Keynell, with the Golf Driving Range to the North. (DWG. B supplied identifies this). Access to this field is proposed from Fowlswick Lane about 200 metres	The accident study included in ES Volume 1, Chapter 13: Transport and Access [REP4-014] takes account of this, there were three accidents over 5 years at this location so isn't regarded as an accident hotspot.

Reference	Theme	Issue	Comments	Applicant's Response
			from the existing crossroads. The proposed opening serving an access track will require considerable enlargement and metaling, as will the Fowlswick Lane itself, which would need to be widened down to the crossroads. (Identified yellow on DWG. B) This will potentially require the removal of the mature hedgerow along the 200 metre length with verge and also have highway drainage implications. The existing crossroads is a known accident black spot and is far from ideal for use by plant and heavy vehicles. The other potential access to this field is proposed to be directly onto the B4039, on the western boundary of the field, which is also a traffic hazard and which will require a large splayed access, with significant visibility splays and signage and a reduction in speed limit. (Identified green on DWG. B) It is considered that if either access proposal was adopted the entire length of	A Solar Farm has already been constructed along Fowlswick Lane, with construction traffic routing via this junction with the B4039 route. There is no proposed widening of Fowlswick Lane. The proposed access works have been set out to serve the compound at Fowlswick Lane are set out in Table 13-11 and Annex D of ES Volume 3, Appendix 13-1: Transport Assessment [REP4-037] and have been considered as part of the assessment.

Reference	Theme	Issue	Comments	Applicant's Response
			mature hedgerow on the B4039 in the northern direction would need removal and replaced along a new visibility line to the crossroads. The change in landscape of this rural area required by these works to facilitate a safe highway arrangement would have significant detrimental impact on the overall character of the area.	
CWPC-004	Transport and Access	Sholwell Farm site access	The second proposed site borders the Parish in a field opposite Showell Farm, not within the Parish, but the problem here is again one of access, which will have to be off the narrow Corsham Lane. (DWG. A supplied identifies this) However, Chippenham Without Parish has a significant interest in that the route to and from the proposed site is likely to be along Corsham Lane via Sheldon Corner and the A420 Allington Farm crossroads. (Identified yellow on DWG. A) The reason being that while the access using the Corsham Lane off the A4 is feasible for large construction traffic, exiting back on to the A4 would be difficult	The cable route will be constructed in four separate 5.5km sections. One access in operation in each section at any one time as rolling construction. Each access will be operation for approximately 90 days. The number of vehicle trips associated with each cable route corridor access are relatively low (see para 13.10.69 of ES Volume 1, Chapter 13: Transport and Access [REP4-014] and there are no current HGV restrictions or accident clusters at this point on the A4.

Reference	Theme	Issue	Comments	Applicant's Response
			and extremely dangerous. (Identified green on DWG. A) Consequently, as other narrow country lanes towards Chequers Farm and Biddestone are entirely impractical for heavy use, it is considered that access to this site would therefore have to be through the Parish. Thus, there will be considerable highway safety implications and potential disruption to this often rat run narrow artery of the Parish especially at the joining local lane junctions, the Sheldon Corner blind spot and the A420 Allington Farm crossroads which will be totally unacceptable from a highway safety point of view as all are existing accident black spots. Thank you for the opportunity of highlighting the Parish Council's specific concerns.	Given the low increase in trips shown in Table 13- 34 of ES Volume 1, Chapter 13: Transport and Access [REP4-014] there was no requirement for further assessment. The cable route construction routes and access locations are shown in ES Volume 2, Figure 13-12: Construction Access Locations: Cable Route Corridor [APP157]. This routing will be secured through the Outline CTMP [REP4-057] and secured in the Draft DCO [REP4-004] so there would be no change to the proposed routing through the parish.

2.16 Helen Worthey

Table 2-16

Reference	Theme	Issue	Comments	Applicant's Response
HW-001	Human Health	Health Impacts	As a result of my oral presentation on 30 June 2026 the Planning Inspectorate requested that I submit a selection of research papers upon which I have relied when compiling the high level summary that I delivered verbally and submitted in written form. The clinical studies and various analyses relate to the known health impacts that the proposed Lime Down Solar would have on the current and future families living in the many North Wiltshire villages affected by Lime Down Solar over the next 60 years.	The Applicant notes this comment. The assessment set out in ES Volume 1, Chapter 18: Human Health [APP-070] looks at population and community-level impacts and only assesses sub-populations where there is an evidenced likelihood that they would experience far greater impacts than the population as a whole (hence why noise and social care services are distinct due to the location of receptors that are far more than likely to experience effects greater than the population overall). This analysis is undertaken through the assessment text, and hence the Applicant is confident that the assessment outcomes accurately reflect population-based outcomes, and sub-population outcomes where there is likely to be a

Reference	Theme	Issue	Comments	Applicant's Response
				substantively different significance of effect.

2.17 Vivienne Jane Clarke

Table 2-17

Reference	Theme	Issue	Comments	Applicant's Response
VJC-001	Landscape and Visual	Field B9-B6 and Fosse Way	At the ISH2 hearing, as an Interested Party, I commented on the impact on the views from the road from Norton towards the CNL and in particular to the long views through the existing gaps in the hedges and gateways into fields on the right (B9-B6). Field B6 is right by the Fosse Way and very close to the boundary of the CNL. The plan at Fig 1 shows the fields in question the proximity to the Fosse Way and PRoWs and the CNL to the proposed panels in Lime Down B. This is an extract from the layered plan submitted by SLD at WR Appendix Z [AS-019] which should be viewed if more detail is required. These long views over flat land are enjoyed by anyone driving or cycling or otherwise travelling towards the CNL	The Applicant notes these comments. The LVIA in ES Volume 1, Chapter 8: Landscape and Visual [REP3-025] recognises the change to the visual amenity and associated Significant Adverse effects to users of those routes as a consequence of the Development. For users of both the Fosse Way (TR145), and Honey Lane Northwest Towards Easton Grey Plain, Norton (TR060) these Significant Adverse effects would remain until the proposed mitigation planting had established (Year 15), at which point views of the adjacent sections of the array would be screened. Both sections of highway are located immediately adjacent to the proposed infrastructure, and are therefore the Applicant agrees that users of these routes are likely to experience adverse

Reference	Theme	Issue	Comments	Applicant's Response
			throughout the year and would be totally changed if 4.5m panels are installed in those fields, whatever mitigation steps are taken. Currently from the Fosse Way just after the sharp bend (Field B6) the view through the gate (shown with a purple arrow on plan as an access) affords views all the way to the water tower in Malmesbury (see Figures 2 and 3). There are also long views through the existing access over Field 9 towards Foxley (Figure 6) and from the existing access gaps on the hill up towards the Fosse Way (Figure 5). The places from which most of these photos were taken (in high summer) and the angle of view is shown on Figure 4	visual effects as a consequence of Development. This is recognised within NPS EN-1 at Para 5.10.13 which states that <i>"All proposed energy infrastructure is likely to have visual effects for many receptors around proposed sites."</i>
VJC-002	Landscape and Visual	Mitigation Concerns	As indicated in my Comments on documents submitted at Deadline 2 [REP3-175] I have serious concerns about the survival of the mitigation planting proposed in the absence of a watering	The Outline LEMP [REP3-100] sets out the proposed ongoing General Management Prescriptions for all

Reference	Theme	Issue	Comments	Applicant's Response
			regime which does not appear to be properly addressed by the Applicant. Any mitigation will only obscure the long views, in an effort to hide the panels.	vegetation within the order Limits, including hedgerows. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, which would be required to be substantially in accordance with the Outline LEMP [REP3-100], is secured through Requirement 7 in Schedule 2 of the Draft DCO [REP4-004]. The watering of new planting is principally a landscape establishment and maintenance matter. The detailed requirements for watering, replacement planting and aftercare will be confirmed through the detailed LEMP, secured by Requirement 12 of the Draft DCO [REP4-004] and prepared substantially in accordance with the Outline LEMP [REP3-100].

Reference	Theme	Issue	Comments	Applicant's Response
				Outline Water Resources Strategy [APP-290] provides an early-stage evaluation of quantities of water required for the Scheme during construction and operation and where the Applicant is likely to resource these demands. The LVIA in ES Volume 1, Chapter 8: Landscape and Visual [REP3-025] acknowledges that as a consequence of the Development, there would be significant adverse effects to Landscape Character and visual amenity and recognises that in places the proposed mitigation would obscure some long views. However, NPS EN-1 recognises at para 5.10.5 that <i>"Virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape, but there may also be beneficial landscape character impacts arising from mitigation."</i> and at Para 5.10.13 that <i>"All proposed energy</i>

Reference	Theme	Issue	Comments	Applicant's Response
				<i>infrastructure is likely to have visual effects for many receptors around proposed sites."</i>
VJC-003	Landscape and Visual	Visibility from PROWs	The plan at Figure 1 also shows that users of WT SHER11 coming from the CNL would see the panels in B6 and probably other fields in Lime Down B. The area is crisscrossed with PROWs and byeways used by ramblers going to and from and CNL.	The LVIA in ES Volume 1, Chapter 8: Landscape and Visual [REP3-025] includes an assessment of potential effects to users of PROW WT SHER 11 (TP031), which recognises that prior to the establishment of the mitigation planting associated with the Scheme there would be glimpsed views of construction activities and infrastructure in field B6 and as a consequence there would be Minor Adverse effects to users of this PROW.
VJC-004	Landscape and Visual	Misleading Imagery- Sheep Grazing	Separately, and arising from what was said by the Applicant's solicitor at ISH4, I note that the Applicant has confirmed that sheep grazing under panels is not part of the proposed Scheme. As indicated in my earlier submissions, the images in the materials used by the Applicant inform the	It is necessary that there will be some flexibility built into the design of the Scheme when submitting the DCO Application so that the detailed design of the Scheme can be informed by technical considerations, post-consent work, and

Reference	Theme	Issue	Comments	Applicant's Response
			public have been misleading. It is noteworthy that the Lime Down website (Figure 8) shows sheep grazing in very wide gaps between panels which are not of the type proposed giving anyone unfamiliar with the actual details of the scheme proposed the impression that the panels would not be significantly taller than the panels often seen by motorways and affording grazing opportunities.	take advantage of innovation in technology. This is of particular importance in order to maintain flexibility due to the rapid pace of change in solar PV and battery storage technology, whilst maintaining a robust and comprehensive assessment of potential effects. The Applicant is applying for two PV systems; a Fixed PV system using Fixed Solar PV Tables with a maximum height of panels at 3.5 m AGL, and a tracking PV system using Tracking Solar PV Tables with a maximum height of panels at 4.5 m AGL. Sheep grazing is a potential future land management option rather than a guaranteed or required component of the Scheme. The Applicant has therefore not relied on sheep grazing in the impact assessment, and the Scheme remains acceptable on the basis of mechanical grassland

Reference	Theme	Issue	Comments	Applicant's Response
				management alone. Any future decision to introduce grazing would be at the discretion of the landowners and farm operators, subject to appropriate management controls, and would not alter the conclusions of the agricultural impact assessment.
VJC-004	Description and DCO Process	Figures	Figures and images for review https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN010168-002044-VJC%20Deadline%20%204.pdf	The Applicant notes this comment. The effects of the Scheme have been fully assessed in the LVIA in ES Volume 1, Chapter 8: Landscape and Visual [REP3-025] which recognises the change to the visual amenity and associated adverse effects to users of those roads around Norton.

2.18 Mary Cundick

Table 2-18

Reference	Theme	Issue	Comments	Applicant's Response
MC-001	Transport and Access	Safety of Horses on Access Tracks	Dear sir, we live at [REDACTED] which is adjacent to the access point of the new emergency vehicle track that is to be put in to the transformer and battery station for lime down solar Farm, we will need to have safe access to T [REDACTED] Farm at all times as it is an equestrian business and safe hacking for the Horses at all times. Horses can be easily frightened, especially by emergency vehicles. Is this a good idea on a single track road?	The emergency access will only be used in case of emergency and will not result in day-to-day impact on the to the operations of the business. While the road is single track, it is lightly trafficked and provides sufficient width for emergency vehicles if required.

2.19 Richard Tanner and Isobel Ross on behalf of Richard Tanner

Table 2-19

Reference	Theme	Issue	Comments	Applicant's Response
RTIR-001	Description and DCO Process	Impact on Livelihood and Financial Compensation	Isabel Ross Interested party [REDACTED] speaking on behalf of Richard Tanner [REDCATED]- We are fourth generation farmers on the pathway of the cabling route. We farm rare breed sheep. The fields the cable trench would cut through are our principal pastures. Aside from the visual, physical and emotional impact on our lives, our ability to keep our flock will be in jeopardy and suffer significant economic losses. Notwithstanding the fact that the ExA has no power over the mechanism for calculating financial compensation, I will speak on it - as it the sums offered by Dalclour Maclaren show their gross misunderstanding of the impact of their cable trench on our lives. The impact of Lime Down on us and our lives will be dramatic. The 50 metre trench, will cut directly through our	The Applicant acknowledges the comments made. The Applicant confirms the trench will not be 50m in width, the trench for the cable will be 1.7m in width and will be located within a 30m working width as stated in Design Principles and Parameters [REP4-043]. In relation to the economic losses, this will be compensated in line with the provisions of the Land Compensation Act 1961, the Land Compensation Act 1973 and is also included as a clause within the Heads of Terms for the voluntary agreement.

Reference	Theme	Issue	Comments	Applicant's Response
			farm, through all of our species-rich meadows, virtually encircling our farmhouse. The cable route cuts through our productive grassland fields on which we have a livery grazing business, a hay business, as well as grazing for our own flock of 300 sheep. You can't keep sheep on a construction site. The land is also in Countryside Stewardship and comprises grasslands that haven't been ploughed since the Second World War. But this isn't about money. The Lime Down cabling route will eliminate our quality of life – destroying our quiet enjoyment and our rights of occupation without disruption.	
RTIR -002	Socio-Economics, Tourism and Recreation	Financial Losses	FINANCIAL LOSS PER YEAR The cable route goes through all three fields of our home farm. The financial loss to us	In relation to the financial losses, this will be compensated in line with the provisions of the Land Compensation Act 1961, the Land Compensation Act 1973 and is also

Reference	Theme	Issue	Comments	Applicant's Response
			per year will be [REDACTED] from loss of business and, we have calculated, [REDACTED] from loss in quality of life. Let me break this down for you: 1. Firstly the value of Countryside Stewardship on the fields in question is [REDACTED] ., 2. Then the loss is [REDACTED] our equine business, which would no longer be viable due to noise and disruption – horses cannot graze or even be in the vicinity of noisy areas and machinery. 3. Then we would lose the main field from which we make our hay, which this year was 900 bales at £6/bale = [REDACTED] 4. We would also lose grazing area, which our sheep flock depends on during the	included as a clause within the Heads of Terms for the voluntary agreement. The Applicant understands there is a stewardship scheme on the land of which the value of this stewardship scheme compensating of which will be considered through the provisions of the Land Compensation Act 1961, the Land Compensation Act 1973. The Applicant acknowledges the comment surround the loss of grazing. The Applicant is committed to providing accommodation works such as crossing points and water troughs to continue to enable livestock to graze. The Applicant is actively seeking to meet with the landowner and their agent to discuss these points in detail and feels it would be beneficial to meet the landowner, and this would not prejudice their position as stated by the Examining Authority in the CAH-1.

Reference	Theme	Issue	Comments	Applicant's Response
			winter and after hay making in the summer. Commercially, this is 40 acres x [REDACTED] but functionally for our flock this means a cut in flock of an estimated 70%. 5. Estimated sheep reduction = 70% from 100 breeding ewes to 30 is an unviable number to keep. 6. What this means for our produce can be equated to 45 burgers per sheep, 70 carcasses, = [REDACTED] (profit is £7 per burger.) 7. Total commercial loss is [REDACTED]	
RTIR -003	Socio-Economics, Tourism and Recreation	Impact on Quality of Life	However, the bigger loss is the disruption and annihilation of our Quality of Life. How could anyone stay to watch the destruction of a much loved farm, lived on and worked for generations? Is there anyone actually in Dalclour Maclaren that could tolerate this?	The assessment of economic impacts in ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068] considers baseline tourism activity, visitor attractions, recreational assets and tourism-dependent businesses within the study area.

Reference	Theme	Issue	Comments	Applicant's Response
			8. We estimation the value of our disrupted quality of life to be [REDACTED] to [REDACTED] . This is based on an average 57 year old, who has 20-30 years of healthy life left. Park Farm is worth [REDACTED] . We would lose the benefit of the farm for the 5 year duration of construction. The loss in economic value years = [REDACTED] They offered us [REDACTED] . It is a faulty assumption that one can remediate the destruction of a 80 year old species rich grassland. Basically, our business will be nonfunctional and our home will be unliveable	The assessment evaluates potential effects on the use, enjoyment and desirability of nearby tourism destinations, including impacts on individual visitor attractions, recreational routes, events and businesses reliant on tourism. It also considers whether changes to landscape character or visual amenity could influence visitor behaviour. The assessment identifies a worst-case scenario in which a temporary loss of up to 50 tourism-related jobs could occur locally during construction, and a long-term loss of up to 11 tourism-related jobs could occur during the operational phase of the Scheme. This represents a precautionary estimate based on conservative assumptions. The assessment concludes that, while some localised effects on tourism receptors are anticipated to occur, significant adverse effects on the wider tourism economy are not anticipated.

Reference	Theme	Issue	Comments	Applicant's Response
RTIR -004	Description and DCO Process	Summary of Negotiations	Summary of negotiations to date Our legal representative [REDACTED] last had a meeting with Dalcour Maclaren (DM) on the 10th April. Since which he received an email from them on the 19th May acknowledging that they had not responded to some of the points raised in that meeting. 22 June 2026 - We have stated to DM that we are unable to agree to the draft heads of terms. Based on the very severe impact of the cable route to our home, where it almost surrounds the property, we won't be entering into any voluntary terms.	The Applicant acknowledges the comments and will endeavour to meet with the landowner and their agent to discuss mitigating factors.
RTIR -005	Description and DCO Process	Map	Annotated map for review https://nsip-documents.planninginspectorate.gov.uk/p	The Applicant notes the provided map which relates to the points responded to above.

Reference	Theme	Issue	Comments	Applicant's Response
			ublished-documents/EN010168-002172-Isabel Ross COMBINED_Redacted.pdf	

2.20 Roberts Berry Farm

Table 2-20

Reference	Theme	Issue	Comments	Applicant's Response
RBF-001	Site Selection and Alternatives	Cable Route	Owing to time constraints, I limited my contribution to asking the question, "why it is necessary for the cable route to go through our land at all?". There is a viable and perhaps cheaper alternative which would take a route to the north through [REDACTED] land. There would need to be two trench less solutions and not one as in the current proposal, but the overall length of any tunnelling would be less. The continuing route through [REDACTED] land would be slightly shorter and could follow a hedgerow and be less disruptive than the current plan that cuts right through the middle of several fields.	The Cable Route Corridor has been selected and refined through an iterative process, beginning with a desktop study and progressing through environmental assessment, technical studies, consultation and landowner engagement, with the objective of keeping the route as direct as practicable while avoiding or reducing effects on environmental and other constraints in accordance with the mitigation hierarchy, as described in ES Chapter 4: Alternatives and Design Evolution [APP-056] . Key considerations included keeping minimising the number of crossings which would increase with the proposed route.
RBF-002	Transport and Access	Ground Conditions and Drainage	I also commented that the chosen route will inevitably be very wet in winter and pretty much inaccessible. I asked the	The Outline SRMP [REP4-053] includes soil field tests and rainfall criteria to determine when ground conditions are

Reference	Theme	Issue	Comments	Applicant's Response
			question about repair plans should faults develop in years to come. The route will also cut right across 9 or 10 field drains. Deep excavations particularly on Cotswold brash have very long lasting effects. Land where sewer pipe was laid by compulsory order in 2017 is estimated to still be only yielding 50% of the undisturbed land adjacent to it. The re establishment of a mature biomass crop will be costly.	suitable for the land to be accessed by machinery and for soil to be handled. Soils excavated for the installation of the cable route will be reinstated as soon as practicable such that the soil conditions are likely to be the same at excavation and replacement. The Outline CEMP [REP4-049] further notes that records will be kept for comparison to ensure that the reinstated soils at least meet the standard identified in pre-condition surveys. Existing field drainage systems crossed by the cable route will be identified through pre-construction surveys and maintained, diverted or reinstated as necessary to preserve their functionality. Any future access required for cable inspection or repair would be managed in accordance with ground conditions at the time.

Reference	Theme	Issue	Comments	Applicant's Response
RBF-003	Soils and Agriculture	Agriculture and Crop Yields	The observations that I did not raise due to time constraints centre around the yield potential of the field where the proposed trench less solutions will come out of the ground. I note from the maps that it is 'predicted' sub grade 3a land. This is probably correct. The national average of winter wheat yields in the UK is approximately 3 tonnes/acre. The land in question has produced 4 tonnes/acre. Our 3b land has produced 3.5 tonnes/acre. It therefore seems fair to say that all the land (in this area) that is designated 3a and 3b land to be used in this project has potential to produce considerable more than the national average (as far as winter wheat production is concerned.) This is not marginal land.	Paragraphs 2.2.9 to 2.2.14 of the Farming and Food Security Technical Note [REP4-079] detail the limitations of the ALC system for classifying land and include confirmation that the grading does not directly reflect present-day production capability. The Applicant acknowledges that Subgrade 3a (and 3b) quality land is capable of effectively contributing to national crop yields.
RBF-004	Ecology and Biodiversity	Baseline Habitat Survey Data	A further observation revolves around the Baseline habitat map and the designation of non-cereal crop and cereal crop. I'm wondering if there is any meaning to these criteria? Clearly the designation was recorded at the time of	The Applicant notes this comment, relating to the categorisation of cereal and non-cereal crops at baseline.

Reference	Theme	Issue	Comments	Applicant's Response
			the survey but it is now incorrect, due to crop rotation. Are there conclusions drawn from this data?	The baseline habitats presented in the application documents, namely ES Volume 3, Appendix 9-1 Baseline Survey Report [REP4-019] and Biodiversity Net Gain Assessment Report [REP4-048], and used to inform the ecological assessment presented in ES Volume 1, Chapter 9: Ecology and Biodiversity [REP4-010], represent the findings of UKHabitat Classification Surveys conducted across the Order Limits between June 2023 and July 2025. It is recognised by the Applicant, that site conditions may have changed since the time of the baseline survey, particularly arable habitat types where fields are under crop rotation. This limitation is recognised in Paragraphs 1.2.13 and 1.2.14 of the BNG Assessment Report [REP4-048]. As stated in the above paragraphs, this is not considered to constitute a significant limitation to the BNG Assessment as

Reference	Theme	Issue	Comments	Applicant's Response
				cereal and non-cereal crops have the same unit score within the Statutory Biodiversity Metric. With regards to the conclusions of the impact assessment presented in ES Volume 1, Chapter 9: Ecology and Biodiversity [REP4-010], the baseline habitat data used for the assessment are considered to constitute representative baseline conditions within the Order Limits, recognising that the proportion of cereal or non-cereal crop cover may vary between years in line with rotational farming practices. The suitability of habitats within the Order Limits for protected species, including farmland specialists, has been assessed on this basis. This is not considered to be a significant limitation to the conclusion of the impact assessment; the Applicant maintains that a sufficiently robust assessment of potential impacts of the Scheme on protected / notable species has been undertaken.

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

3.1 Wiltshire Council – Comments on Submissions Received at Deadlines 2a and 3

Table 3-1

Reference	Theme	Issue	Comments	Applicant's Response
WC1-001	Transport and Access	2.3 Works Plans (Rev 3)	2.3 Works Plans (Rev 3) [REP3-004] 1.1. The 23 number works plan drawings identify works proposed within public highway as Works Numbers 8A or 8B. As noted in past highway comments, it is inferred that where lengths of public highway are excluded from these designations on the Works Plan, no mitigation or improvements are deemed necessary by the Applicant to accommodate the increased HGV trafficking expected during construction. The remaining exclusion of certain lengths of the narrow rural lanes on the planned construction routes remains a concern following the review of Annex K to the Transport Assessment [REP3-066] showing the swept path analysis.	In response to ISH3 and comments from the Examining Authority, further information on road widths and widening has been provided in Annex I and Annex K of ES Volume 3, Appendix 13-1: Transport Assessment [REP4-037] at Deadline 4 including Drawings PL302-PL304 and Drawings PL305-PL308. The areas of Work Numbers 8A and 8B have been identified as areas of the highway where works, including highway improvement areas, are required. Highway works outside of these areas may be carried out under the powers in the draft DCO, with the consent of the highway authority, as discussed during Issue Specific Hearings 3 and 4 (see [REP4-086] and [REP4-087]).

Reference	Theme	Issue	Comments	Applicant's Response
WC1-002	Transport and Access	3.1 Draft Development Consent Order (Rev 3) [REP3-006] and 3.2 Explanatory Memorandum (Rev 3) [REP3-008]	3.1 Draft Development Consent Order (Rev 3) [REP3-006] and 3.2 Explanatory Memorandum (Rev 3) [REP3-008] Article 10 2.1. There are no major changes to this Article in Revision 3, so past comments remain applicable. The DCO needs 'Protective Provisions' for Wiltshire Council (Highways) to be included in Schedule 15, with appropriate reference made to this in this Article as may be required. Article 10(4) states that: "The powers conferred by paragraph (2) may not be exercised without the consent of the street authority, such consent to be in a form reasonably required by the street authority". This might usefully cross-reference the said Protective Provisions in due course.	Protective provisions for the local highway authority have been included as Part 11 of Schedule 15 to the Draft DCO [REP4-004]. The protective provisions have effect by virtue of article 45. It would not be appropriate to refer to protective provisions for the local highway authority within article 10 which also applies to private streets where the highway authority will not be the 'street authority'.
WC1-003	Transport and Access	3.1 Draft Development Consent Order (Rev 3) [REP3-006] and 3.2	2.2. As noted in the Wiltshire Council response to the ExQ1 (DCO 1.14) [REP3-142], the council do not see why it should be necessary for Article 10 of the 4 DCO to confer powers under (2) to	Article 10 is necessary if highway works are required in the public highway to prevent the delayed delivery of a Nationally Significant Infrastructure Project. As discussed during Issue

Reference	Theme	Issue	Comments	Applicant's Response
		Explanatory Memorandum (Rev 3) [REP3-008]	alter the "alter the layout of any street", so not just the streets identified with the Work Area plans and within the DCO Order limits. Whilst Article 10(4) requires the Applicant to consult with the street authority, with the consent process to be in a form reasonably required by the street authority, the 6-week limit for determination / approval under Article 47(4) is a real concern as the council will have no idea as to the scale or complexity of any highway works outside the DCO Order Limits which the Applicant may seek to propose in the future. As such, the council sees no reason why the Applicant should not follow the standard Wiltshire Council s278 Agreement process for developer works to the highway where the works duly required and proposed are outside of the DCO Order Limits.	Specific Hearing 4, the purpose of the provisions of the Draft DCO [REP4-004] is to ensure that no other statutory consent is required for the works, for example under section 278 of the Highways Act 1980. Article 10 provides for such works to only be authorised where agreed with the relevant street authority. Protective provisions for the local highway authority have also been included as Part 11 of Schedule 15 to the Draft DCO [REP4-004]. The potential, identified by Wiltshire Council, for works to be required to public highways beyond what has been identified within the application documents confirms the need for the power conferred by article 10 to extend beyond the Order Limits.
WC1-004	Transport and Access	3.1 Draft Development Consent Order (Rev 3) [REP3-006] and 3.2	Article 11 2.3. See separate comments on the provisions within this clause in response to the EXQ1 (DCO 1.15) [REP3-142], and expressly 11(b)(ii) where the	Please refer to the Applicant's response to Other Parties' Responses to Examining Authority's First Written Questions [REP4-081].

Reference	Theme	Issue	Comments	Applicant's Response
		Explanatory Memorandum (Rev 3) [REP3-008]	completed works may be subject to ongoing HGV construction trafficking associated with the wider development following the expiry of the 12-month maintenance or defects period. The risk of consequent damage by construction trafficking to highway works completed early in the construction phase is an issue, as the council is mindful that construction damage to the narrow rural roads proposed for HGV construction access could be far more widespread than subsequent damage to completed areas under works. The council is seeking a formal s59 Agreement (Highway Act 1980) within the DCO to cover potential damage to this wider network caused by extraordinary trafficking. If this is in place, then it would potentially cover damage defects liability for included road lengths which have been subject to works beyond the 12-month period. However, it is considered that a proposed change to Article 11(1)(b)(i) would not be unreasonable so requiring:	The Applicant does not accept that construction of the Scheme will require any extraordinary trafficking, and notes that the Outline CTMP [REP4-057] requires road condition surveys to be carried out and any damage attributable to the Scheme to be repaired. Protective provisions for the local highway authority have also been included as Part 11 of Schedule 15 to the Draft DCO [REP4-004] .

Reference	Theme	Issue	Comments	Applicant's Response
			• The applicant to maintain the altered street (or highway works) or a minimum period of 12-months following works completion or, • Where LDSF construction trafficking continues, 12-months from the date that construction trafficking along the said length of road ceases.	
WC1-005	Transport and Access	3.1 Draft Development Consent Order (Rev 3) [REP3-006] and 3.2 Explanatory Memorandum (Rev 3) [REP3-008]	Article 14 2.4. There is again no drafting change made to this Article in this revision to the DCO, so previous comments remain valid. To reiterate, there is concern about the precise wording of Article 14, as it implies that approval by the highway authority is only required for new access locations proposed beyond those set out in Schedule 7, Parts 1 and 2. In short, all the accesses in Schedule 7, whether permanent or temporary, are seemingly deemed approved in at least principle under powers conferred in Article 14. However, the council does not consider the current level of design sufficient, or that the detailed design and technical approval of permanent	The Applicant confirms that the DCO authorises the making of new accesses and the improvement of existing accesses in the locations listed in Schedule 7 and shown on the Access Plan [APP-010]. Article 14 should be read in conjunction with article 10, which provides the power to carry out the alteration to the highway necessary to form the accesses. The detailed design of these accesses is controlled thorough the Outline CTMP [REP4-057], and protective provisions for the local highway authority have been included at Part 11 of Schedule 15 to the Draft DCO [REP4-004].

Reference	Theme	Issue	Comments	Applicant's Response
			highway works is a part of the CTMP process. However, it is accepted that the addition of Wiltshire Council Protective Provisions in Schedule 15 will include a requirement for technical approval of all works drawings (including Schedule 7 works) and associated Road Safety Audits as part of these provisions once finally agreed.	
WC1-005	Transport and Access	3.1 Draft Development Consent Order (Rev 3) [REP3-006] and 3.2 Explanatory Memorandum (Rev 3) [REP3-008]	Article 15 2.5. Article 15 is also unchanged in this revision to the DCO so previous comments remain. The inclusion of bespoke Wiltshire Council 'Protective Provisions' may negate the need for a formal and separate agreement in all cases. Given the powers conveyed under DCO Article 10, and assuming this is backed with Protective Provisions for Wiltshire Council to be added in Schedule 15, it remains unclear as to when the provisions in Article 15 would then be needed. If the DCO articles in themselves give no power to dedicate new land as public highway then this	Article 15 provides for a street authority (which may not be the highway authority) to enter into agreements with the Applicant with respect to works to and affecting the street in question. Provision for such agreement is made to cover where works are carried out in private streets, as well as to provide a statutory basis for an agreement with a highway authority to be entered into, noting that an agreement under s278 of the Highways Act 1980 would not be appropriate where the streets powers to be controlled originate from the Order.

Reference	Theme	Issue	Comments	Applicant's Response
			may be one instance, but confirmation is sought.	
WC1-006	Transport and Access	3.1 Draft Development Consent Order (Rev 3) [REP3-006] and 3.2 Explanatory Memorandum (Rev 3) [REP3-008]	2.6. Refer also to comments on the 'Applicants Response to the Examining Authority's First Written Questions' [REP3-128] which contains the Applicant's latest position on these DCO Clauses.	The Applicant has responded to this submission below under a separate heading.
WC1-007	Arboriculture	3.1 Draft Development Consent Order (Rev 3) [REP3-006] and 3.2 Explanatory Memorandum (Rev 3) [REP3-008]	Article 40 and Schedule 12 2.7. It is noted that column (2) of the table in Part 1 of Schedule 12 has been updated to refer to the TPO and hedgerow plan rather than the hedgerows plan.	The Applicant notes this comment.
WC1-008	Arboriculture	3.1 Draft Development Consent Order	2.8. Wiltshire Council also notes that the hedgerow ID references have been updated column (1) of the table in Part 2	The Applicant notes this comment. These changes were documented in the

Reference	Theme	Issue	Comments	Applicant's Response
		(Rev 3) [REP3-006] and 3.2 Explanatory Memorandum (Rev 3) [REP3-008]	of Schedule 12, and that column (2) now cites the TPO and hedgerow plan rather than the hedgerows plan. The lengths of important hedgerow have also been amended in column (2). These changes do not, however, appear to be listed in the Schedule of Changes table at the front of 3.2 Explanatory Memorandum (Rev 3) [REP3-008] or explained in this document as should have been the case for completeness and transparency.	Schedule of Changes to the Draft DCO [REP4-004] .
WC1-009	Arboriculture	3.1 Draft Development Consent Order (Rev 3) [REP3-006] and 3.2 Explanatory Memorandum (Rev 3) [REP3-008]	2.9. The council notes the inclusion of the following footnote to the tables in Part 1 and 2 of Schedule 12: "The extent to which each hedgerow listed in this table may be removed is controlled by the ecological protection and mitigation strategy, pursuant to article 40(4) of the Order."	The Applicant notes this comment.
WC1-010	Arboriculture	3.1 Draft Development Consent Order (Rev 3) [REP3-006] and 3.2	2.10. It is also recognised that Article 40(4) in Part 6 of the dDCO states: "(4) The undertaker may, for the purposes of the authorised development or in connection with the authorised	The Applicant notes this comment.

Reference	Theme	Issue	Comments	Applicant's Response
		Explanatory Memorandum (Rev 3) [REP3-008]	development and subject to paragraph (2), remove 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)."	
WC1-011	Arboriculture	3.1 Draft Development Consent Order (Rev 3) [REP3-006] and 3.2 Explanatory Memorandum (Rev 3) [REP3-008]	2.11. Paragraph 4.6.11 of the Explanatory Memorandum explains the provisions of Article 40 and states: "The Article also allows the undertaker to remove those hedgerows specified in Schedule 12 (Hedgerows to be removed) Schedule 12 is divided into Part 1 (Removal of hedgerows), Part 2 (Removal of important hedgerows) and Part 3 (Trees subject to tree preservation orders). Article 40(4) clarifies that the power is to remove hedgerows specified in Parts 1 and 2 of Schedule 12, to the extent set out in the Ecological Protection and Mitigation Strategy approved pursuant to Requirement 8 in Schedule 2."	The Applicant notes this comment.

Reference	Theme	Issue	Comments	Applicant's Response
WC1-012	Arboriculture	3.1 Draft Development Consent Order (Rev 3) [REP3-006] and 3.2 Explanatory Memorandum (Rev 3) [REP3-008]	2.12. Whilst the council welcomes the inclusion of the footnote to Part 1 and 2 of Schedule 12, the council was already aware of the provisions of Article 40(4) and does not consider that the amendments overcome or adequately address the concerns and issues it has already raised and detailed in full in previous representations.	The Applicant notes this comment. Please refer to the response to question DCO2.10 in the Applicant's Response to the Examining Authority's Second Written Questions [EN010168/EXAM/9.54] which addresses these concerns directly.
WC1-013	Arboriculture	3.1 Draft Development Consent Order (Rev 3) [REP3-006] and 3.2 Explanatory Memorandum (Rev 3) [REP3-008]	2.13. Moreover, no further information has been submitted to substantiate why it is necessary to list every hedgerow within the Order Limits if as the Applicant advises, all hedgerow removal will be controlled by the provisions of Article 40(4) and be undertaken in accordance with that prescribed within the EPMS in any case. Again, the adopted approach to Schedule 12 brings into question why the overly wide powers afforded by Schedule 12 are in fact needed and why the extent of removal cannot be refined within the schedule. The council considers that it should, at the very least, be possible to	The Applicant notes the Council's comments but does not consider that specifying a minimum and maximum extent of removal for each individual hedgerow within Schedule 12 would provide any additional environmental control or materially refine the powers sought. Schedule 12 identifies the hedgerows that may require works during construction of the Scheme. However, the extent of any removal from those hedgerows will ultimately be governed by the provisions of Article 40(4), together with the detailed design

Reference	Theme	Issue	Comments	Applicant's Response
			specify in column (2) of Part 1 and Part 2 of Schedule 12, a range of hedgerow removal i.e. a minimum and maximum extent of hedgerow that may need to be removed from each of the hedgerows listed. This should be possible given the provisions of Article 40(4) and the footnotes in Schedule 12.	developed following the granting of the DCO and the requirements of the Outline EPMS [REP4-055]. These provisions already restrict the maximum width of hedgerow removal that may be undertaken for the relevant construction activities and require hedgerow removal to be minimised and undertaken in accordance with the secured controls. Please refer to the Applicant's response to DCO2.10 in the Applicant's Response to the Examining Authority's Second Written Questions [EN010168/EXAM/9.54] which provides further detail and addresses these concerns.
WC1-014	Arboriculture	3.1 Draft Development Consent Order (Rev 3) [REP3-006] and 3.2 Explanatory Memorandum (Rev 3) [REP3-008]	2.14. In Wiltshire Council's Relevant Representation [RR-4934] , it was highlighted that the stipulation that hedgerow removal within the Bath and Bradford-on-Avon Bat SAC consultation zone will be restricted to 10m has not been transposed into the relevant rows of Schedule 12. Previously this had been ascertained by the council to	Please refer to the Applicant's response to DCO2.10 in the Applicant's Response to the Examining Authority's Second Written Questions [EN010168/EXAM/9.54] which provides further detail and addresses these concerns.

Reference	Theme	Issue	Comments	Applicant's Response
			constitute Sheet 40 to 45 inclusive of the Hedgerow Removal Plans but would now be the relevant sheets in the TPO and hedgerow plans. This request has still not been fulfilled, and no rationale has been provided by the Applicant as to why this is the case. The omission of the restrictions to hedgerow removal proposed in the HRA from the relevant rows of Schedule 12 undermines confidence that the measures set out in the HRA will actually be delivered, despite the footnotes added to Schedule 12, Part 1 and Part 2 and the provisions of Article 40(4). The council is unclear and unconvinced as to why continuity across the dDCO, the EPMS and the HRA has not been deemed permissible by the Applicant in order for the council and ExA to have certainty that Article 40(4) and the footnotes to Schedule 12 will be adhered to strictly.	
WC1-015	Arboriculture	3.1 Draft Development Consent Order (Rev 3) [REP3-006] and 3.2	Article 41 and Schedule 13 2.15. The council considers that all works affecting Category A and Category B trees, Ancient Trees, Veteran Trees, and trees protected by a	The Applicant notes this comment. All works with the potential to impact trees will be carried under the instruction and/or supervision of the ACoW once tree protection measures are in place

Reference	Theme	Issue	Comments	Applicant's Response
		Explanatory Memorandum (Rev 3) [REP3-008]	Tree Preservation Order (TPO) should be appropriately monitored by the Arboricultural Clerk of Works (ACoW), recorded, and reported to the Local Planning Authority (LPA). This includes, but is not limited to: • Tree removal; • Canopy damage; • Root damage; • Hand-digging and root-pruning; and • Installation of ground protection.	and with the ACoW having signed off the works. This is secured within the Outline CEMP [REP4-049] and the Outline OEMP [REP4-051] .
WC1-016	Arboriculture	3.1 Draft Development Consent Order (Rev 3) [REP3-006] and 3.2 Explanatory Memorandum (Rev 3) [REP3-008]	2.16. Temporary compounds should be located outside the Root Protection Area (RPA) of trees and woodlands. This requirement should be consistent with the guidance relating to "Root loss / damage from excavation or soil compaction within RPAs" and shall take precedence over the requirements set out under "Tree Pruning" where there is any inconsistency.	The Applicant notes this comment. As stated in Table 4 of the Outline CEMP [REP4-049] Temporary compounds will be sited outside of the RPAs of retained trees.
WC1-017	Arboriculture	3.1 Draft Development Consent Order (Rev 3) [REP3-006]	2.17. Proposed works or removal of any Category A or Category B tree, Ancient Tree, Veteran Tree, or tree protected by a TPO shall be notified in writing to the	In respect of trees protected by tree preservation orders, Article 41 has been amended in the Draft DCO [REP4-004] to require notice of activities to such

Reference	Theme	Issue	Comments	Applicant's Response
		006] and 3.2 Explanatory Memorandum (Rev 3) [REP3-008]	LPA prior to the commencement of the works.	trees to be provided to the relevant planning authority. The following text has been added to the OEMP at Deadline 5. Where, during operation of the authorised development, a retained BS 5837:2012 Category A or Category B tree, or any veteran or ancient tree, is felled or removed for reasons including safety, disease, structural failure or other operational necessity, the undertaker shall notify Wiltshire Council in writing within five working days of the tree being felled or removed. • The notification shall include: • the location and reference number of the tree; • the reason for the felling or removal; and the date on which the works were undertaken.
WC1-018	Arboriculture	3.1 Draft Development Consent Order	Replacement Planting 2.18. Wiltshire Council should retain control over the species, size,	The Outline LEMP [REP3-100] sets out the proposed ongoing General Management Prescriptions for all

Reference	Theme	Issue	Comments	Applicant's Response
		(Rev 3) [REP3-006] and 3.2 Explanatory Memorandum (Rev 3) [REP3-008]	specification and location of all replacement planting required in lieu of the removal of any Category A, B and / or protected trees.	vegetation within the order Limits. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, which would be required to be substantially in accordance with the Outline LEMP [REP3-100], is secured through Requirement 7 in Schedule 2 of the Draft DCO [REP4-004]. In relation to tree works on TPO trees, notice will be given under Article 40
WC1-019	Arboriculture	3.1 Draft Development Consent Order (Rev 3) [REP3-006] and 3.2 Explanatory Memorandum (Rev 3) [REP3-008]	2.19. A detailed replacement planting scheme should be submitted for approval to the LPA prior to commencement of works, demonstrating no net loss of tree canopy, landscape function or biodiversity value.	The Outline LEMP [REP3-100] sets out the proposed ongoing General Management Prescriptions for all vegetation within the order Limits. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, which would be required to be substantially in accordance with the Outline LEMP [REP3-100] , is secured through Requirement 7 in Schedule 2 of the Draft DCO [REP4-004] .

Reference	Theme	Issue	Comments	Applicant's Response
WC1-020	Arboriculture	3.1 Draft Development Consent Order (Rev 3) [REP3-006] and 3.2 Explanatory Memorandum (Rev 3) [REP3-008]	Post-Construction / HDD Monitoring 2.20. Clarification is required regarding the monitoring regime for retained trees following construction, particularly where Horizontal Directional Drilling (HDD) is proposed within or adjacent to Root Protection Areas (RPAs).	The monitoring regime will be provided in the detailed CEMP which will require the review and approval of Wiltshire Council. Ongoing monitoring by the Arboricultural Clerk of Works is secured in the Outline CEMP [REP4-049] .
WC1-021	Arboriculture	3.1 Draft Development Consent Order (Rev 3) [REP3-006] and 3.2 Explanatory Memorandum (Rev 3) [REP3-008]	2.21. Post-construction monitoring should be undertaken by a suitably qualified arboriculturist for an agreed period to assess any delayed impacts on retained trees and identify remedial measures where necessary.	Monitoring in the post construction phase will be undertaken by a suitably qualified arboriculturist. Ongoing monitoring by the Arboricultural Clerk of Works is secured in the Outline CEMP [REP4-049] .
WC1-022	Arboriculture	3.1 Draft Development Consent Order (Rev 3) [REP3-006] and 3.2 Explanatory Memorandum	Responsibilities for Planting and Maintenance 2.22. The Applicant should confirm: • Who will be responsible for implementing replacement planting.	The Outline LEMP [REP3-100] sets out the proposed ongoing General Management Prescriptions for all vegetation within the order Limits. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, which would be required to be

Reference	Theme	Issue	Comments	Applicant's Response
		(Rev 3) [REP3-008]	• Who will be responsible for ongoing monitoring and maintenance. • The duration of the maintenance period. • The mechanism for replacing failed trees.	substantially in accordance with the Outline LEMP [REP3-100] , is secured through Requirement 7 in Schedule 2 of the Draft DCO [REP4-004] .
WC1-023	Arboriculture	3.1 Draft Development Consent Order (Rev 3) [REP3-006] and 3.2 Explanatory Memorandum (Rev 3) [REP3-008]	2.23. A condition should require that any tree which dies, is removed, becomes seriously diseased or fails to establish within the maintenance period is replaced with a tree of similar species, size and specification unless otherwise agreed by the Local Planning Authority.	The Outline LEMP [REP3-100] sets out the proposed ongoing General Management Prescriptions for all vegetation within the order Limits, including hedgerows. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, which would be required to be substantially in accordance with the Outline LEMP [REP3-100] , is secured through Requirement 7 in Schedule 2 of the Draft DCO [REP4-004] .
WC1-024	Arboriculture	3.1 Draft Development Consent Order (Rev 3) [REP3-006] and 3.2 Explanatory Memorandum	Updating Council Records 2.24. The Applicant should set out how Wiltshire Council will be notified of: • Tree removals undertaken. • Replacement planting completed.	The notifications process will be provided with the Detailed Management Documents (CEMP, AMS, LEMP, EPMS etc.).

Reference	Theme	Issue	Comments	Applicant's Response
		(Rev 3) [REP3-008]	Failures and subsequent replacements.	The Outline LEMP [REP3-100] sets out the proposed ongoing General Management Prescriptions for all vegetation within the order Limits, including hedgerows. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, which would be required to be substantially in accordance with the Outline LEMP [REP3-100], is secured through Requirement 7 in Schedule 2 of the Draft DCO [REP4-004]. Ongoing monitoring by the Arboricultural Clerk of Works is secured in the Outline CEMP [REP4-049] and the Outline OEMP [REP4-051], with monitoring and reporting to local authorities and regulatory bodies overseen by an Environmental Manager.
WC1-025	Arboriculture	3.1 Draft Development Consent Order (Rev 3) [REP3-006] and 3.2 Explanatory Memorandum	2.25. Provision should be made for updating the council's tree asset and TPO records through the submission of as-built tree plans and monitoring reports.	The Outline LEMP [REP3-100] sets out the proposed ongoing General Management Prescriptions for all vegetation within the order Limits, including hedgerows. The preparation, approval and implementation of the detailed Landscape and Ecological

Reference	Theme	Issue	Comments	Applicant's Response
		(Rev 3) [REP3-008]		Management Plan, which would be required to be substantially in accordance with the Outline LEMP [REP3-100], is secured through Requirement 7 in Schedule 2 of the Draft DCO [REP4-004]. In respect of trees protected by tree preservation orders, Article 41 has been amended in the Draft DCO [REP4-004] to require notice of activities to such trees to be provided to the relevant planning authority.
WC1-026	Arboriculture	3.1 Draft Development Consent Order (Rev 3) [REP3-006] and 3.2 Explanatory Memorandum (Rev 3) [REP3-008]	Future Tree Preservation Orders (TPOs) 2.26. Clarification is required regarding the status of existing and future trees within the Order Limits during the operational life of the solar park.	The Applicant has no power to make any tree subject to a tree preservation order. It is therefore not in a position to comment on whether the Council intends to make any tree within the Order Limits subject to a tree preservation order within the lifetime of the Scheme.
WC1-027	Arboriculture	3.1 Draft Development Consent Order	2.27. The scheme should not prejudice the council's ability to make new Tree Preservation Orders where trees	The Applicant confirms that nothing in the Draft DCO [REP4-004] restricts the Council from making new tree

Reference	Theme	Issue	Comments	Applicant's Response
		(Rev 3) [REP3-006] and 3.2 Explanatory Memorandum (Rev 3) [REP3-008]	establish sufficient public amenity value during the lifetime of the development and the Applicant should be required to comply with the protections included therein.	preservation orders. The Order provides the power to carry out works to trees that may be made subject to a tree preservation order, consistent with the Applicant's permitted development rights. Please refer to the Applicant's response to Action Point 3 in the Written Summary of the Applicant's Oral Submissions and Responses at Issue Specific Hearing 4 and Responses to Action Points [REP4-087] .
WC1-028	Arboriculture	3.1 Draft Development Consent Order (Rev 3) [REP3-006] and 3.2 Explanatory Memorandum (Rev 3) [REP3-008]	2.28. The Applicant should confirm that access, management arrangements and operational requirements will not restrict the designation or protection of trees under future TPOs.	Please refer to the response to WC1-027 above.
WC1-029	Arboriculture	3.1 Draft Development Consent Order (Rev 3) [REP3-006]	2.29. Furthermore, as previously indicated, the council considers that the Arboricultural Impact Assessment and	As previously indicated by the Applicant, the AIA and AMS are appendices to the Environmental Statement which is a certified document under Schedule 13

Reference	Theme	Issue	Comments	Applicant's Response
		006] and 3.2 Explanatory Memorandum (Rev 3) [REP3-008]	Aboricultural Method Statement should be certified under Schedule 13.	and thus the AIA and AMS are considered certified within that document.
WC1-030	Transport and Access	3.1 Draft Development Consent Order (Rev 3) [REP3-006] and 3.2 Explanatory Memorandum (Rev 3) [REP3-008]	Schedule 15 Protective Provisions 2.30. Schedule 15 'Protective Provisions' still needs a 'Part' added to provide protective measures for the Benefit of the Local Highway Authority (Wiltshire Council), which is currently absent. It is however accepted that this is a matter under discussion with the Applicant, and which is not yet part of the draft DCO. The council's preferred Protective Provisions are included within Appendix A of its Post Hearing Submissions response, which has also been submitted at Deadline 4.	Protective provisions for the local highway authority were added as Part 11 of Schedule 15 to the Draft DCO [REP4-004] .
WC1-031	Transport and Access	6.1 ES Volume 1, Chapter 13 Transport and	3.1. Comments where applicable are made in respect of the revised Transport Assessment [REP3-066] below, as this chapter in Volume 1 of the Environment Statement simply mimics the content of	The Applicant makes note of this comment.

Reference	Theme	Issue	Comments	Applicant's Response
		Access (Rev 3) [REP3-020]	the Transport Assessment for the most part.	
WC1-032	Transport and Access	6.1 ES Volume 1, Chapter 13 Transport and Access (Rev 3) [REP3-020]	3.2. The council's Highways Development Management Officer does however refer to the following: • Paragraph 13.4.10: This states that "Other than the Highway Improvement Areas which form part of the Order Limits, the assessment assumes that the road network and existing services will remain the same". As stated verbally at the ISH3 Hearing, it is considered passing space improvements along the narrow rural lanes forming parts of the HGV construction access routes are needed at locations outside the HIA (which is currently limited to Alderton Road).	All roads on routes to PV sites are two-way working and not single-track lanes. There are no HGV restrictions on any of the links proposed as construction routes. The Applicant has submitted locations along the construction routes to Lime Down A-C and Lime Down D (via Bradfield cottage) showing two HGVs passing in Annex K of ES Volume 3, Appendix 13-1: Transport Assessment [REP4-037]. As requested, the drawings now include road width geometry at the passing places, which demonstrate at least a 5.5 metre road width to allow two HGVs to pass, as specified by Wiltshire Council. The Council considers that additional works to accommodate two-way HGV passage on the rural lanes outside the

Reference	Theme	Issue	Comments	Applicant's Response
				Alderton Road HIA are required. For clarity, the Applicant is also proposing widening along the Fosse Way, which is outside of the HIA works on Alderton Road. The proposed widening works on Alderton Road and Fosse Way are shown in Annex I of ES Volume 3, Appendix 13-1: Transport Assessment [REP4-037]. The Applicant maintains that no mitigation works to improve HGV passage under the DCO are needed outside of the DCO order limits.
WC1-033	Transport and Access	6.1 ES Volume 1, Chapter 13 Transport and Access (Rev 3) [REP3-020]	Table 13-20 shows the forecast number of overall HGV movements over the construction period by Lime Down Solar Park site (and mean / 'peak' daily predictions). This remains a subject of disagreement and discussion pending the provision of more information from the Applicant on assumptions and some validation against other Solar Farm forecasts. This was also discussed at length during the ISH3 Hearing, and the council comments further on the 9.34	The Applicant has submitted revised trip generation calculations in the same format as the SLD calculations at Deadline 5. This document is titled 'Highways Technical Note in response to Appendix A of the SLD Deadline 4 submission' [EN010168/EXAM/9.64]. These calculations have now been discussed with SLD's transport consultant.

Reference	Theme	Issue	Comments	Applicant's Response
			Applicant's Response to Stop Lime Down Written Representation – Appendix D Transport Report [REP3-133] below.	
WC1-034	Transport and Access	6.1 ES Volume 1, Chapter 13 Transport and Access (Rev 3) [REP3-020]	• Table 13-21 shows the expected number of shuttle buses and car / light van movements associated with the 622 workers expected across the Lime Down Solar Park sites. The assumed 50% mode share taken by the shuttle buses is considered too high to be seen as a worst-case scenario assessment, as made clear in the council's comments at CTMP/TA Scoping stage despite this being accepted on other Solar Farm projects. It is also noted from the table that, of the remaining workers (302), 98 are assumed to be car sharing (32%). As such, the single-occupant car trips are only assumed to comprise an 18% mode share which does seem low.	Worker trips were based on a breakdown of worker trips provided by a contractor based on the draft layouts and programme. The peak worker trips in a month (622) were distributed to all sites proportionally based on areas. Resulting in 295 workers in A,B and C and 327 workers in D and E. A check was done to see if the daily peaks within any months exceeded these trips. It was found that they were lower with 289 workers in A, B and C and 313 in D and E. In terms of distribution of Construction workers, they are split between: • Those whose permanent residence is within the Study Area (within 20km of area); and • Construction workers whose permanent residence is outside

Reference	Theme	Issue	Comments	Applicant's Response
				of the Study Area (beyond 20km) and they either stay in temporary accommodation or travel from their permanent residence, most likely by train. ES Volume 1, Chapter 16: Socio Economics, Tourism and Recreation [APP-068] states that on a peak day, 59.5% are estimated to relocate from across the UK to the Study Area, private rental accommodation, hotels and serviced accommodation. Based on 40.5% workers in the Study Area already working in the 'Construction of utility projects' employment subsector. Whilst the shuttle bus will be available for all workers it is expected that it will primarily serve the 59.5% as these will be workers staying known locations in larger groups and suitable pick up and drop off shuttle bus points can be easily arranged.

Reference	Theme	Issue	Comments	Applicant's Response
				Examples of percentage shuttle bus use for consented DCO solar farms include: • Gate Burton – at post decision stage – 55% shuttle bus • Beacon Fen Energy Park – in examination – 55% • Tillbridge Solar Project – post decision stage – 47% • Stonestreet Green Solar – post decision stage – 75% • Longfield Solar Farm – post decision stage – 55% • Cleve Hill Solar Farm – Delivered – 100% Based on this, the assumption of 50% shuttle bus usage is justified, with potential for shuttle bus usage to be higher, and for it to also serve local workers. The shuttle bus will be managed through measures set out in the Construction Worker Travel Plan, which will form part of the Final CTMP. This will include details on pick-up and

Reference	Theme	Issue	Comments	Applicant's Response
				drop-off locations and limits placed on on-site contractor parking provision. This is a construction phase so car sharing is expected and would probably exceed 1.5 occupancy level assumed in the Applicants assessment so is robust.
WC1-035	Transport and Access	6.1 ES Volume 1, Chapter 13 Transport and Access (Rev 3) [REP3-020]	Table 13-23 shows the magnitude of the daily construction traffic movements expected along various routes. As noted in the past, whilst the HGVs will be forced to use the prescribed construction routes to the Lime Down Solar Park areas, it seems improbable that light vehicle trips associated with workers will be similarly channeled to just these routes. A wider distribution would be expected and more plausible.	Table 13-23 in ES Volume 1, Chapter 13: Transport and Access [REP4-014] provides a worst-case assumption in term of impact by placing all light vehicle trips onto the identified construction routes.
WC1-036	Landscape and Visual	6.1 ES Volume 1, Chapter 8 Landscape and Visual (Rev 2) [REP3-026]	6.1 ES Volume 1, Chapter 8 Landscape and Visual (Rev 2) [REP3-026] 4.1. The council notes the table heading changes from enhancement to mitigation.	The Applicant notes this comment.

Reference	Theme	Issue	Comments	Applicant's Response
WC1-037	Landscape and Visual	6.2 ES Volume 2, Figure 3-4-4.1 and 3-4-4.2 Landscape and Ecology Mitigation Plan (Rev 3) [REP3-037]	6.2 ES Volume 2, Figure 3-4-4.1 and 3-4-4.2 Landscape and Ecology Mitigation Plan (Rev 3) [REP3-037] 5.1. Given the potential for substantial land take requirements, the council considers that indicative footprint areas for potential soil storage stockpiles should be added to the plan to demonstrate that these would not impact upon embedded mitigation buffers and stand offs, and to reduce the risk that these would end up being located within areas of ecological mitigation or enhancement.	The Outline SRMP [REP4-053] specifies the maximum height of stockpiles (3m for topsoil or 4m for subsoil) and the maximum side slope for long-term stockpiles (1 in 2, or 25°). Footprints and exact dimensions of individual stockpiles have not been specified at this outline stage but will be determined in the detailed design in collaboration with other disciplines. The Applicant acknowledges that soil structures are disturbed during the handling and stockpiling process, however following the best practice guidance for handling, seeding the stockpiles to enable root penetration which promotes stability and aeration within the stockpiles, and nutrient testing prior to any soil reinstatement, will ensure that stockpiled soils maintain condition and can be reused. For the purposes of ES Volume 1, Chapter 8: Landscape and Visual [REP3-025], the construction phase effects are effects that result from

Reference	Theme	Issue	Comments	Applicant's Response
				activities during site preparation / enabling works, construction, and commissioning activities, for example, effects such as construction traffic, noise and vibration from construction activities, dust generation, site runoff, mud on roads, and the visual intrusion of plant and machinery on Site. ES Volume 1, Chapter 8: Landscape and Visual [REP3-025] has undertaken a realistic 'worse case' assessment based on the principles of the Rochdale Envelope and has therefore considered a construction programme for the entire Scheme to be approximately 24 months with the potential likelihood of overlapping construction works on the different Sites as set out within ES Volume 1, Chapter 3: The Scheme [APP-055]. The LVIA has used the principles set out within Design Principles and Parameters [REP4-043], to inform the

Reference	Theme	Issue	Comments	Applicant's Response
				LVIA considerations associated with the Construction phase requirements.
WC1-038	Landscape and Visual	6.2 ES Volume 2, Figure 3-4-4.1 and 3-4-4.2 Landscape and Ecology Mitigation Plan (Rev 3) [REP3-037]	6.2 ES Volume 2, Figure 3-4-4.1 and 3-4-4.2 Landscape and Ecology Mitigation Plan (Rev 3) [REP3-037] 5.2. It would also have been helpful if the amendments could be tracked or clearly annotated on the plan, so that it is easier to decipher what the changes to the plan comprise.	The Applicant notes this comment.
WC1-039	Landscape and Visual	6.3 ES Volume 3, Appendix 8-3-2-2 Landscape and Visual Assessment Sheets Significant (Rev 2) [REP3-045]	6.3 ES Volume 3, Appendix 8-3-2-2 Landscape and Visual Assessment Sheets Significant (Rev 2) [REP3-045] 6.1. The council notes the correction to an advised error contained in the visual assessment sheet for Grain Store Barn.	The Applicant notes this comment.
WC1-040	Landscape and Visual	6.3 ES Volume 3, Appendix 8-3-3 Summary of Visual Effects	6.3 ES Volume 3, Appendix 8-3-3 Summary of Visual Effects (Rev 2) [REP3-047]	The Applicant notes this comment.

Reference	Theme	Issue	Comments	Applicant's Response
		(Rev 2) [REP3-047]	6.1. The council notes the correction to an advised error contained in the visual assessment sheet for Grain Store Barn.	
WC1-041	Landscape and Visual	6.3 ES Volume 3, Appendix 8-3-3 Summary of Visual Effects (Rev 2) [REP3-047]	6.3 ES Volume 3, Appendix 8-3-3 Summary of Visual Effects (Rev 2) [REP3-047] 7.1. The council notes the correction to an advised error contained in the private receptors' summary sheet for Grain Store Barn.	The Applicant notes this comment.
WC1-042	Transport and Access	6.3 ES Volume 3, Appendix 13-1 Transport Assessment (Rev 3) [REP3-066]	6.3 ES Volume 3, Appendix 13-1 Transport Assessment (Rev 3) [REP3-066] 8.1. As noted in the listed Schedule of Change at Deadline 3, most of the main-body changes to the report are minor and the council's Highways Development Management Officer offers no comment on these. It is also noted that no changes have been made to Annex E, so the supporting calculations underlying the HGV trip	The Applicant has submitted revised trip generation calculations in the same format as the SLD calculations at Deadline 5. This document is titled 'Highways Technical Note in response to Appendix A of the SLD Deadline 4 submission' [EN010168/EXAM/9.64]. These calculations have now been discussed with SLD's transport consultant.

Reference	Theme	Issue	Comments	Applicant's Response
			generation during the construction phase. The council's latest comments on this element are set out in the response to the Applicant's response to the Deadline 2 submissions [REP3-129] , and expressly WCD1-082 to 086.	
WC1-043	Transport and Access	6.3 ES Volume 3, Appendix 13-1 Transport Assessment (Rev 3) [REP3-066]	8.2. The council therefore focuses here on the following changes: • Annex J: Update of Drawings SP43 to SP46 • Annex K: Update of drawing SP51, SP52, SP54 and SP55 and inclusion of Drawing PL300 and PL301 to demonstrate vertical alignment/visibility.	The Applicant makes note of this comment.
WC1-044	Transport and Access	6.3 ES Volume 3, Appendix 13-1 Transport Assessment (Rev 3) [REP3-066]	8.3. At the ISH3 Hearing, it was noted that base topographical survey drawings for 'all' the minor roads forming the HGV construction routes should be provided, with the actual carriageway width dimensions indicated at intervals. It was suggested by Wiltshire Council that each road should employ a chainage line, with widths indicated at, say, 10m intervals. As 5.5m is the minimum width necessary for 2-way HGV passage, and 4.8m for car / HGV passage (MfS), it	At the request of the Examining Authority, the applicant has also submitted information at Annex I of ES Volume 3 Appendix 13-1: Transport Assessment (Rev 4) [REP4-037] showing locations where widths of 5.5 metres and 6.0 metres will be available. Further topographical data is being obtained, and the requested

Reference	Theme	Issue	Comments	Applicant's Response
			would be helpful to colour-shade route sections with carriageway widths 5.5m or greater and 4.8-5.5m, with unshaded lengths then indicating lengths with a width of less than 4.8m. This would provide a better 'at a glance' suitability of the existing routes, which is difficult to pick up from the swept path plots where a lot of underlying base detail is masked.	topographical base data will be provided at Deadline 6.
WC1-045	Transport and Access	6.3 ES Volume 3, Appendix 13-1 Transport Assessment (Rev 3) [REP3-066]	Annex J 8.4. It is understood from the Applicant's response to the Wiltshire Council Deadline 2 comments on Annex J that, in respect of the Dyson RBT to Bradfield Cottages section, Drawings SP34-B and SP36-B are now based on a topographical survey base and demonstrate an HGV and car can pass for the vast majority of the route, with the longest length of restricted passage between a car and HGV just under 30 metres in length. Similarly, drawings SP43-SP46 have been updated at Deadline 3 to demonstrate inter-visibility	The Applicant makes note of this comment.

Reference	Theme	Issue	Comments	Applicant's Response
			between HGVs and cars on the Fosse Way using a topographical survey base and including indicative widening improvements within the Order Limits, with the longest length of restricted passage between a car and HGV just under 75 metres in length.	
WC1-046	Transport and Access	6.3 ES Volume 3, Appendix 13-1 Transport Assessment (Rev 3) [REP3-066]	8.5. With respect to the Fosse Way drawings, SP44A and SP45A showing the northern section indicates a narrow length of some 168m. Furthermore, proposals for carriageway widening where indicated are very unclear in terms of scale / width upgrade. Furthermore, these passing place improvements will need to cater for the passage of two HGVs, and it is thus unclear as to whether what is shown will achieve this.	The proposed widening works on Alderton Road and Fosse Way are shown in further detail at Annex I of ES Volume 3 Appendix 13-1: Transport Assessment [REP4-037] in Drawings PL302 – PL304.
WC1-047	Transport and Access	6.3 ES Volume 3, Appendix 13-1 Transport Assessment (Rev 3) [REP3-066]	8.6. It is noted that Drawings SP38 and SP39A showing swept paths along the road length between the Fosse Way and Lime Down A are still based on OS Land-line mapping. This needs a topographical base to ensure accuracy.	Further topographical data is being obtained, and the requested updates to Drawings SP38 and SP39A will be provided at Deadline 6.

Reference	Theme	Issue	Comments	Applicant's Response
WC1-048	Transport and Access	6.3 ES Volume 3, Appendix 13-1 Transport Assessment (Rev 3) [REP3-066]	Annex K 8.7. With respect to Drawing SP50A showing the road between the Fosse Way and the Lime Down A access points, the council's comments above also apply. Analysis needs a topographical base. The drawing shows that an HGV on the Fosse Way arriving at the junction would have a 125m sightline to a southbound HGV leaving Lime Down A. However, it is unclear whether this southbound HGV could pass the other HGV near the junction if proceeding beyond this last available passing point.	Further topographical data is being obtained, and the requested updates to Drawings SP50A will be provided at Deadline 6.
WC1-049	Transport and Access	6.3 ES Volume 3, Appendix 13-1 Transport Assessment (Rev 3) [REP3-066]	8.8. Drawing SP51A shows the route length from Dyson RBT to Bradfield Cottages. Insert 4 has now been added to show that a 10m tipper and a 16.5m articulated HGV could pass using the existing access with the wide concrete apron located midway between Brookside and the Flying Monk Café access. This gives sufficient comfort over HGV passage through this section.	The Applicant makes note of this comment. Drawing SP51-A shows an additional six passing opportunities for two HGVs to pass between the Flying Monk café access and the Lime Down D access points, with the longest intervisibility being 167.4 metres. While this is considered acceptable by the Applicant, the avoidance of two HGVs meeting along this section can also be

Reference	Theme	Issue	Comments	Applicant's Response
			However, the limited opportunities for 2-way HGV passage between the café access and the Lime Down D access points remains a concern. Similarly, the section south of the railway bridge extending to the bend is clearly variable in carriageway width and less than 5.5m in several locations. As such, there is a high likelihood the verge here could be regularly overrun and damaged with regular HGV trafficking.	managed due to the proximity to the site and the ability to hold departing vehicles back until this section is clear. While the section south of the railway bridge extending to the bend is variable in carriageway width, there are three opportunities for two HGVs to pass within this 170 metre long section, with the longest intervisibility measuring 59.3 metres. This is considered acceptable by the Applicant.
WC1-050	Transport and Access	6.3 ES Volume 3, Appendix 13-1 Transport Assessment (Rev 3) [REP3-066]	8.9. Drawings SP54A and SP55A show the southern and northern lengths of Fosse Way. As previously noted, passing place spacing for 2-way HGV passage exceeding 300m is not accepted, with this shown to be the case immediately north of the Fosse Lodge junction (SP54A - Inset 2) and just north of the railway bridge (SP55A- Inset 1). With respect to Drawing SP55A, the analysis shows a northbound HGV waiting near the junction with the road to Sherston, but it is unclear whether another HGV turning right from this road	The Applicant makes note of this comment. It is noted that there are two locations where intervisibility between passing places exceeds 300 metres, the flat and straight nature of the Fosse Way means that road users have a clear visibility between passing places. This is demonstrated in Drawing PL301 in Annex K of ES Volume 3 Appendix 13-1: Transport Assessment [REP4-037] .

Reference	Theme	Issue	Comments	Applicant's Response
			could pass another HGV waiting in the location shown.	
WC1-051	Scheme Description and DCO Process	7.4 Design Principles and Parameters (Rev 3) [REP3-084]	7.4 Design Principles and Parameters (Rev 3) [REP3-084] 9.1. The council notes that in the Applicant's response to ExQ1 EB1.16 [REP3-128], states that the Design Principles and Parameters (Rev 3) "has been updated at Deadline 3 to include the implementation of a 15m buffer zone for all works to North Bincombe Wood". The council has been unable to locate the aforementioned change within REP3-084, and therefore requests clarification from the Applicant as to where this has been incorporated.	This was updated in the Outline CEMP at Deadline 3 and a further version has been submitted at Deadline 4 to provide further detail of the construction methodology to be used in proximity of Bincombe Wood (please see Outline CEMP [REP4-049]).
WC1-052	Transport and Access	7.4 Design Principles and Parameters (Rev 3) [REP3-084]	9.2. Therefore, the council's concern regarding the access track at North Bincombe Wood remains unresolved.	The Applicant has clarified the position in its response immediately above.
WC1-053	Scheme Description and DCO Process	7.4 Design Principles and Parameters	9.3. Furthermore, the council has reviewed the included scheme 'Commitments' – Specific elements of	The Applicant notes this comment and has responded to the specific points below. Please also refer to the

Reference	Theme	Issue	Comments	Applicant's Response
		(Rev 3) [REP3-084]	the detailed design of the scheme components including considerations such as appearance, materials, colour and alignment included for the works number (1 to 10) in REP3-084 . The council considers the following (minor additions) to already advised 'commitments' for the following 'work numbers' and 'scheme components' should be further secured and incorporated to provide more certainty that detailed design solutions will be sympathetic to the rural character of the area.	Applicant's response to question DCO1.37 in the Applicant's Response to the Examining Authority's First Written Questions [REP3-128] , which sets out how the appearance of elements of the Scheme are secured across the Requirements.
WC1-054	Transport and Access	7.4 Design Principles and Parameters (Rev 3) [REP3-084]	9.4. The council considers minor additions to two existing detailed design commitments repeated within the tables should be further incorporated. These relate to the: 9.5. 'Perimeter fencing commitment' and the 'highway access point commitment' as incorporated within Section 2.2-2.11, pages 5 to 26, within the following tables.	The Applicant's detailed responses to these two points are dealt with below.

Reference	Theme	Issue	Comments	Applicant's Response
WC1-055	Landscape and Visual	7.4 Design Principles and Parameters (Rev 3) [REP3-084]	Table 2-3 (Work No.3) Design Parameters and Commitments 9.6. Work no. 3 - works in connection with on-site substations. • Deer type wire mesh and wooden post fencing outside of the palisade fencing (Page 13). Add 'Wooden posts shall be round in section and agricultural in appearance.' (or similar wording).	The Applicant has updated the Design Principles and Parameters [REP4-044] as submitted at Deadline 4 to incorporate this wording.
WC1-056	Landscape and Visual	7.4 Design Principles and Parameters (Rev 3) [REP3-084]	Table 2-5 (Work No.6) Design Parameters and Commitments 9.7. Work No.6 – works (a to k) various ancillary components including, fencing, landscaping etc. • Perimeter Fencing Commitment (Page 20). Add 'Wooden posts shall be round in section and agricultural in appearance.' (or similar wording). • Solar PV access tracks commitment (page 21). Add 'Any edge restraints required to form or retain surface materials at access points will be laid to finish flush with adjacent road levels to	Regarding the perimeter fencing commitment, the Applicant has updated the Design Principles and Parameters [REP4-044] as submitted at Deadline 4 to incorporate this wording. Regarding the solar PV access tracks commitment, the Outline CTMP [REP4-057] has been updated at deadline 4 to include this wording (see section 6.3 on specific highway measures).

Reference	Theme	Issue	Comments	Applicant's Response
			avoid creation of uncharacteristic upstands' (or similar wording).	
WC1-057	Landscape and Visual	7.4 Design Principles and Parameters (Rev 3) [REP3-084]	Table 2-7 (Work No.8) Design Parameters and Commitments 9.8. Work No. 8a (temporary works) 8b (permanent works) – works to facilitate access to Work Nos. 1 to 7 and 9 to 10. • BESS and Substation access commitment (page 24). Add 'Any edge restraints required to form or retain surface materials at access points will be laid to finish flush with adjacent road levels to avoid creation of uncharacteristic upstands' (or similar wording).	The Outline CTMP [REP4-057] has been updated at deadline 4 to include this wording (see section 6.3 on specific highway measures).
WC1-058	Landscape and Visual	7.4 Design Principles and Parameters (Rev 3) [REP3-084]	• In relation to work no's 8a (ii) and 8b (ii) 'Creation of visibility splays' and 8a (iv) 8b (iv) 'offsite works adjacent to highways land including those to structures, boundary features, drainage features on private land, in connection with the movement of abnormal indivisible loads', the council requests the consideration and inclusion of the following additional commitments: Add "where existing sections of roadside	The Outline CTMP [REP4-057] has been updated at deadline 4 to include this wording (see section 6.3 on specific highway measures).

Reference	Theme	Issue	Comments	Applicant's Response
			hedgerows or dry stone walls are necessary to remove to facilitate the temporary creation of highway visibility splays and widened access to accommodate AIL's, the removed sections of hedgerow or drystone wall shall be replanted or reconstructed on existing alignments following completion of any temporary works, and on new adjusted alignments along the back edge of the required visibility splays for any permanent works' (or similar wording to achieve same outcomes).	
WC1-059	Landscape and Visual	7.4 Design Principles and Parameters (Rev 3) [REP3-084]	<u>Table 2-8 Work No.9 Design Parameters and Commitments</u> 9.9. Work No. 9 – works (a to f) to create and maintain habitat management areas. • Fencing Commitment (page24). Add 'Wooden posts shall be round in section and agricultural in appearance.' (or similar wording).	The Applicant has updated the Design Principles and Parameters [REP4-044] as submitted at Deadline 4 to incorporate this wording.
WC1-060	Landscape and Visual	7.4 Design Principles and Parameters	Table 2-9 Work No.10 Design Parameters and Commitments	The Applicant has updated the Design Principles and Parameters [REP4-

Reference	Theme	Issue	Comments	Applicant's Response
		(Rev 3) [REP3-084]	9.10. Work No. 10 – creation of permissive paths • Fencing Commitment (page26). Add 'Wooden posts shall be round in section and agricultural in appearance.' (or similar wording).	044] as submitted at Deadline 4 to incorporate this wording.
WC1-061	Landscape and Visual	7.4 Design Principles and Parameters (Rev 3) [REP3-084]	Soil Stockpiles 9.11. The council also considers that minimum / maximum design parameters for cross sectional soil stockpile / bund profiles should be added as a specific design parameter. The council suggests incorporating this into <u>Table 2-5 (Work No.6)</u> which the council considers should include commitments for maximum height of bunds and minimum cross-sectional widths across the top and base of bund / stockpiles and minimum / maximum stockpile / bund slope angles / gradients.	The Outline SRMP [REP4-053] specifies the maximum height of stockpiles (3m for topsoil or 4m for subsoil) and the maximum side slope for long-term stockpiles (1 in 2, or 25°). Exact dimensions of individual stockpiles have not been specified at this outline stage but will be determined in the detailed design in collaboration with other disciplines.
WC1-062	Transport and Access Landscape and Visual	7.4 Design Principles and Parameters (Rev 3) [REP3-084]	The Councils Reasons and Justification 9.12. The council considers its requests reasonable in order to mitigate risk from introducing uncharacteristic development components such as square section timber fence posts for	The Applicant notes this comment and has provided specific responses to the Council's requests in the response to WC1-194

Reference	Theme	Issue	Comments	Applicant's Response
	Arboriculture		fenced boundary treatments over a large, protracted area of rural countryside, and from introducing overly urban fabric components such as raised kerbs at new private access points from the public highway, impacting the character of the local rural roads and lanes. Also to ensure that the AIL works at Grittleton crossroads appropriately mitigate for potential tree loss along the edge of the adjacent woodland and /or removal of the dry-stone wall and to demonstrate soil stockpiles are practically achievable without impacting embedded mitigation or enhancement measures.	
WC1-063	Ecology and Biodiversity	7.8 Biodiversity Net Gain Assessment Report (Rev 3) [REP3-086] and 7.9 Biodiversity Net Gain Assessment Appendix Statutory Biodiversity	7.8 Biodiversity Net Gain Assessment Report (Rev 3) [REP3-086] and 7.9 Biodiversity Net Gain Assessment Appendix Statutory Biodiversity Metric Calculation (Rev 3) Excel [REP3-089] 10.1. Wiltshire Council provided detailed comments on the BNG Assessment Report and the BNG metric submitted in its Written Representation [REP1-138].	The Applicant notes this and refers to the responses provided to the Council's Written Representations on BNG matters set out within the Applicant's Response to Written Representations [REP2-038] . The Applicant welcomes the Council's Comment that Observation 1 is considered resolved.

Reference	Theme	Issue	Comments	Applicant's Response
		Metric Calculation (Rev 3) Excel [REP3-089]	During Issue Specific Hearing 3 (ISH3) on 2 July 2026, the ExA raised the matter of the detailed observations regarding the BNG Assessment Report and Statutory Biodiversity Metric that were made by Wiltshire Council in the aforementioned representation [REP1-138] . Observation 1 was discussed during ISH3, and this matter is considered resolved.	
WC1-064	Ecology and Biodiversity	7.8 Biodiversity Net Gain Assessment Report (Rev 3) [REP3-086] and 7.9 Biodiversity Net Gain Assessment Appendix Statutory Biodiversity Metric Calculation (Rev 3) Excel [REP3-089]	10.2. The ExA requested that Observations 2 to 11 inclusive are discussed between the Applicant and the council by means of the SoCG.	The Statement of Common Ground with Wiltshire Council [REP4-061] will be updated to record the ongoing discussions between the Applicant and Wiltshire Council for submission at future deadline.

Reference	Theme	Issue	Comments	Applicant's Response
WC1-065	Ecology and Biodiversity	7.8 Biodiversity Net Gain Assessment Report (Rev 3) [REP3-086] and 7.9 Biodiversity Net Gain Assessment Appendix Statutory Biodiversity Metric Calculation (Rev 3) Excel [REP3-089]	10.3. Wiltshire Council has reviewed 7.8 Biodiversity Net Gain Assessment Report (Rev 3) [REP3-086] , 7.9 Biodiversity Net Gain Assessment Appendix Statutory Biodiversity Metric Calculation (Rev 3) [REP3-088] and 7.9 Biodiversity Net Gain Assessment Appendix Statutory Biodiversity Metric Calculation (Rev 3) (Excel) [REP3-089] submitted at Deadline 3 and it evident that no revisions have been made to the aforementioned submissions that address or overcome the observations and concerns raised by the Council.	The Applicant notes this comment. The Applicant confirms that consultation responses received in relation to the Biodiversity Net Gain (BNG) Assessment Report [REP4-045] and the Statutory Biodiversity Metric [REP4-047], including those submitted by the Council have been reviewed by the Applicant. Where the Applicant considered that amendments to be necessary or proportionate in response to consultation comments these have been made. Where amendments have not been made, this reflects the Applicant's view that the information presented within the remains robust and sufficient to support the assessment conclusions and does not represent an absence of consideration of the Council's comments. The Applicant has responded to the Council's specific observations and concerns through the relevant examination submissions.

Reference	Theme	Issue	Comments	Applicant's Response
WC1-066	Ecology and Biodiversity	7.10 Habitats Regulations Assessment Report (Rev 2) [REP3-091]	7.10 Habitats Regulations Assessment Report (Rev 2) [REP3-091] 11.1. The council notes that the HRA has been updated to only address the comments raised by Natural England (NE) and not any of the issues that have been raised consistently by the council since the provision of its statutory consultation response to the PEIR prior to submission of the DCO application. This is evident from a review of the Schedule of Changes at the front of the HRA [REP3-091] which only list amendments undertaken to address comments from NE.	The Applicant acknowledges this comment. The Applicant notes that consultation responses received in relation to the Habitats Regulations Assessment (HRA) Report [REP3-090], including those submitted by the Council have been reviewed by the Applicant. Where the Applicant considered amendments to the HRA Report [REP3-090] to be necessary or proportionate in response to consultation comments, these have been made. Where amendments have not been made, this reflects the Applicant's view that the information presented within the HRA Report [REP3-090] remains robust and sufficient to support the assessment conclusions and does not represent an absence of consideration of the Council's comments.
WC1-067	Ecology and Biodiversity	7.10 Habitats Regulations Assessment Report (Rev 2) [REP3-091]	11.2. The council remains concerned about the lack of bat survey within the section of the CRC that coincides with the greater horseshoe bat consultation zone that extends 4km from the Box Mine component of the Bath and	The Applicant acknowledges the Council's continued concern regarding the scope of surveys undertaken within the Cable Route Corridor. The Applicant has consistently maintained the view that the survey scope and effort for the

Reference	Theme	Issue	Comments	Applicant's Response
			Bradford-on-Avon Bats SAC, and the implications for the accuracy, robustness and reliability of the HRA. Sufficient survey should be undertaken to suitably inform the HRA, and it is necessary to be able to draw conclusions in the appropriate assessment regarding whether the project would have an adverse effect on the integrity of the SAC or its qualifying features beyond reasonable scientific doubt.	Cable Route Corridor is appropriate and proportion to the likelihood of significant effects occurring. The Applicant notes the scope for bat surveys within the Cable Route Corridor, (including where it intersects the consultation zone of the Box Mine component of the Bath and Bradford-on-Avon Bats SAC), has been agreed with Natural England as set out in the Statement of Common Ground with Natural England [REP4-064] . The Applicant maintains the view that the assessment of the Scheme's impacts on the Bath and Bradford-on-Avon Bats SAC set out within the HRA Report [REP3-090] , including the conclusion of no significant adverse effects is robust. The Applicant notes Natural England is in agreement with the assessment and conclusion.
WC1-068	Ecology and Biodiversity	7.10 Habitats Regulations Assessment Report (Rev 2) [REP3-091]	11.3. The council also remains concerned regarding Schedule 12 of the dDCO and the potential for hedgerow removal to take place that is greater than that specified in the HRA and the EPMS on account of the overly wide scope of, and powers afforded by,	The Applicant notes the Council's position. Schedule 12 identifies the hedgerows that may require works during construction of the Scheme. However, the extent of any removal from those hedgerows will ultimately be governed by the provisions of Article

Reference	Theme	Issue	Comments	Applicant's Response
			Schedule 12 of the dDCO. This concern remains irrespective of the footnotes to Part 1 and 2 of Schedule 12 and the provisions of Article 40(4).	40(4), together with the detailed design developed following the granting of the DCO and the requirements of the Outline EPMS [REP4-055]. These provisions restrict the maximum width of hedgerow removal that may be undertaken for the relevant construction activities and require hedgerow removal to be minimised and undertaken in accordance with the secured controls. Please refer to the Applicant's response to DCO2.10 which responds to this matter in detail, confirming no inconsistency between the documents and explaining why the broad power is requirement and how it is effectively controlled.
WC1-069	Ecology and Biodiversity	7.10 Habitats Regulations Assessment Report (Rev 2) [REP3-091]	11.4. For full details of the council's concerns please also refer to the council's previous representations, Wiltshire Council's response to Action Point 14 and Action Point 18 assigned by the ExA during Issue Specific Hearing 3 (ISH3)(Item 3 Ecology and	The Applicant notes that consultation responses submitted by the Council have been reviewed by the Applicant and responded to through the relevant examination submissions

Reference	Theme	Issue	Comments	Applicant's Response
			Biodiversity) and in the council's ISH3 Post Hearing Summary.	
WC1-070	Ecology and Biodiversity	7.10 Habitats Regulations Assessment Report (Rev 2) [REP3-091]	11.5. Whilst Wiltshire Council maintains in stance in respect of the HRA, it is recognised that NE has expressed confidence in the conclusions of the HRA. Moreover, NE comprises the relevant statutory nature conservation body (SNCB) and statutory consultee at the appropriate assessment stage of the HRA process, whereas Wiltshire Council is not the determining or competent authority for this DCO. Therefore, Wiltshire Council will now defer to NE on this matter as it is evident that the respective parties (the Applicant, NE and Wiltshire Council) are not in agreement on all matters within the HRA and that none of the points of concern to the Council have been addressed by the Applicant and are unlikely to be overcome within the Examination timeframe, and that therefore the aforementioned parties are effectively at an impasse.	The Applicant notes the Council's position and acknowledges that differences of professional judgement remain between the parties on certain aspects of the HRA Report [REP3-090] . The Applicant welcomes its acknowledgement that Natural England, as the statutory nature conservation body and principal consultee in relation to the HRA process, is satisfied with the conclusions of the HRA Report [REP3-090] . Throughout the Examination, the Applicant has carefully considered and responded to the Council's HRA-related representations through the relevant examination submissions, including providing additional information, clarification and justification where considered necessary. Whilst the Council's concerns have not resulted in amendments to the HRA Report [REP3-090] , the Applicant highlights that this reflects the Applicant's conclusion that the assessment remains robust and that the information provided

Reference	Theme	Issue	Comments	Applicant's Response
				is sufficient to enable the competent authority to undertake an appropriate assessment, rather than an absence of consideration of the Council's comments.
WC1-071	Climate Change and Energy Need	7.12 Outline Construction Environmental Management Plan (Rev 4) [REP3-093] 12.1.	7.12 Outline Construction Environmental Management Plan (Rev 4) [REP3-093] 12.1. 12.1. The council notes the amendment to Table 1 with respect to Low Emissions Vehicles. However, it is considered that as the precise specifications of panels and other component parts are not known at this stage, further commitments and mitigations could be included within the Plan once there was more knowledge about carbon emissions, i.e. from the procurement process for scheme construction and materials. Consideration should be given to incorporating requirements for GHG emissions and carbon reduction plans into the specification and contracts.	The Applicant confirms that as part its own corporate governance, emissions associated with the Scheme would be monitored and reported at a project level from the commencement of construction. Prior to construction commencing, the Applicant's procurement process involves assessing contractors and suppliers on their specific net-zero commitments, sustainability systems, and procurement practices. The Applicant has updated the Outline Construction Environmental Management Plan at Deadline 5 to strengthen the commitment to utilising sustainable procurement processes. Under this framework, contractors would be required to report quarterly on project emissions, including embodied carbon, while Environmental Product Declarations (EPDs) would be provided where available.

Reference	Theme	Issue	Comments	Applicant's Response
				Furthermore, Engineering, Procurement, and Construction (EPC) contractors will be expected to define how emissions will be managed through carbon management plans, which will consider practical measures such as the use of lower-emission construction plant.
WC1-072	Arboriculture	7.12 Outline Construction Environmental Management Plan (Rev 4) [REP3-093] 12.1.	12.2. The council welcomes the addition to Table 4 regarding North Bincombe Wood, and the Applicant's commitment for the access tracks to maintain a minimum 15m buffer from the boundary of the Ancient Woodland. However, further clarity is required, and the council reserves comment until it has had a chance to review the updated plans showing the position of the realigned access track. The council notes that in the Applicant's response to ExQ1 EB1.16 [REP3-128] , it indicates that the "access track has been realigned." In the ExQ1 question response, the Applicant further states that the Design Principles and Parameters (Rev 3) "has been updated at Deadline 3 to include the implementation of a 15m buffer zone for	The Applicant notes this comment. The new alignment of the Proposed access road will be shared as it becomes available.

Reference	Theme	Issue	Comments	Applicant's Response
			all works to North Bincombe Wood". However, please see separate comment above regarding REP3-084 .	
WC1-073	Arboriculture	7.12 Outline Construction Environmental Management Plan (Rev 4) [REP3-093] 12.1.	12.3. Furthermore, the council notes the Applicant's position as expressed at the Issue Specific Hearings that they still propose to use the existing track as access to the Solar PV site. The council considers that this will result in encroachment within the 15m buffer,	The Applicant notes this comment. All vehicles are no longer proposed to use the existing track adjacent to North Bincombe Wood. The existing access track adjacent to North Binscombe Wood is only now proposed to be used

Reference	Theme	Issue	Comments	Applicant's Response
			which is contradictory to the arboricultural statement where ancient woodland is afforded this protection. Whilst the council appreciates that the existing track may be used by landowners, this would not result in changes to the track surface, and the existing maintenance of the hedgerow on the track side would still be managed by the farmer. Justification of use of the existing track by the Applicant is required, as the council considers that the Applicant should utilise the proposed relocated track for AIL vehicles during the lifetime of the solar development instead.	for light vehicle access to undertake inspections and maintenance works.
WC1-074	Hydrology, Flood Risk and Drainage	7.12 Outline Construction Environmental Management Plan (Rev 4) [REP3-093]	12.4. The council notes the amendment to Table 5 with respect to rainwater harvesting.	The Applicant notes this comment.
WC1-075	Climate Change and Energy Need	7.13 Outline Operational Environmental Management	7.13 Outline Operational Environmental Management Plan (Rev 4) [REP3-095]	The Applicant repeats its earlier response which states that as part its own corporate governance, emissions associated with the Scheme would be

Reference	Theme	Issue	Comments	Applicant's Response
		Plan (Rev 4) [REP3-095]	13.1. The council notes the amendment to Table 1 with respect to Low Emissions Vehicles. However, it is considered that as the precise specifications of panels and other component parts are not known at this stage, further commitments and mitigations could be included within the Plan once there was more knowledge about carbon emissions, i.e. from the procurement process for scheme construction and materials. Consideration should be given to incorporating requirements for GHG emissions and carbon reduction plans into the specification and contracts.	monitored and reported at a project level from the commencement of construction. Prior to construction commencing, the Applicant's procurement process involves assessing contractors and suppliers on their specific net-zero commitments, sustainability systems, and procurement practices. Under this framework, contractors would be required to report quarterly on project emissions, including embodied carbon, while Environmental Product Declarations (EPDs) would be provided where available. Furthermore, Engineering, Procurement, and Construction (EPC) contractors will be expected to define how emissions will be managed through carbon management plans, which will consider practical measures such as the use of lower-emission construction plant.
WC1-076	Hydrology, Flood Risk and Drainage	7.13 Outline Operational Environmental Management	13.2. The council notes the amendment to Table 5 with respect to rainwater harvesting.	The Applicant notes this comment.

Reference	Theme	Issue	Comments	Applicant's Response
		Plan (Rev 4) [REP3-095]		
WC1-077	Scheme Description and DCO Process	7.14 Outline Decommissioning Strategy (Rev 3) [REP3-097]	14.1. The council welcomes the addition that the Community Liaison Group will be required to meet from a date not less than six months prior to the intended date of decommissioning of that part.	The Applicant notes this comment.
WC1-078	Climate Change and Energy Need	7.14 Outline Decommissioning Strategy (Rev 3) [REP3-097]	14.2. The council notes the amendment to Table 1 with respect to Low Emissions Vehicles. However, it is considered that as the precise specifications of panels and other component parts are not known at this stage, further commitments and mitigations could be included within the Plan once there was more knowledge about carbon emissions, i.e. from the procurement process for scheme construction and materials. Consideration should be given to incorporating requirements for GHG emissions and carbon reduction plans into the specification and contracts.	The Applicant repeats its earlier response which states that as part its own corporate governance, emissions associated with the Scheme would be monitored and reported at a project level from the commencement of construction. Prior to construction commencing, the Applicant's procurement process involves assessing contractors and suppliers on their specific net-zero commitments, sustainability systems, and procurement practices. Under this framework, contractors would be required to report quarterly on project emissions, including embodied carbon, while Environmental Product Declarations (EPDs) would be provided where available.

Reference	Theme	Issue	Comments	Applicant's Response
				Furthermore, Engineering, Procurement, and Construction (EPC) contractors will be expected to define how emissions will be managed through carbon management plans, which will consider practical measures such as the use of lower-emission construction plant.
WC1-079	Hydrology, Flood Risk and Drainage	7.14 Outline Decommissioning Strategy (Rev 3) [REP3-097]	14.3. The council queries why the amendment to the outline CEMP and outline OEMP in relation to consideration of rainwater harvesting has not been similarly replicated within the outline Decommissioning Strategy.	The Applicant agrees that the same principle should apply during decommissioning. The omission from the Outline Decommissioning Strategy [REP3-097] was not intended to indicate a different approach. The Outline Decommissioning Strategy [REP3-096] will therefore be updated to confirm that the detailed Decommissioning Strategy will consider opportunities for rainwater harvesting for appropriate non-potable uses, including vehicle washdown and dust suppression, where practicable and subject to not compromising pollution control, drainage performance or firewater containment requirements. This will align with the approach in the

Reference	Theme	Issue	Comments	Applicant's Response
				Outline CEMP [REP4-049] and Outline OEMP [REP4-051].
WC1-080	Arboriculture	7.14 Outline Decommissioning Strategy (Rev 3) [REP3-097]	14.4. The council notes additional commentary added regarding assessment of hedgerows at time of decommissioning.	The Applicant notes this comment.
WC1-081	Hydrology, Flood Risk and Drainage Soils and Agriculture	7.15 Outline Soil Resources Management Plan (Rev 2) [REP3-099]	7.15 Outline Soil Resources Management Plan (Rev 2) [REP3-099] 15.1. Wiltshire Council are pleased that in the decommissioning phase, paragraph 1.8.31 terminology has been amended to include auger boreholes and pits being dug across the site to check for sign of compaction, and that remedial actions such as subsoiling will take place if needed. This issue is now agreed.	The Applicant notes that this issue is agreed. The Statement of Common Ground with Wiltshire Council [REP4-061] was updated at Deadline 4 to record the agreement.
WC1-082	Landscape and Visual	7.18 Outline Landscape and Ecological Management Plan (Rev 2) [REP3-101]	16.1. The council notes that paragraph 1.3.34 of the LEMP states: "The shrubby element of hedgerows (excluding select hedgerow trees) will be maintained to an optimum height of 4–5 m tall. However, in order to retain an element of open views from the Cotswold National	The Applicant notes this comment.

Reference	Theme	Issue	Comments	Applicant's Response
			Landscape (CNL), the shrubby element of hedgerows bordering the CNL at the north of C1 and west/southwest boundaries of C1, C6, C8, C9 and C10 will be managed at a minimum height of 1.5 m."	
WC1-083	Landscape and Visual	7.18 Outline Landscape and Ecological Management Plan (Rev 2) [REP3-101]	16.2. In order to avoid duplication, for details of the Council's view on the Applicant's intention to manage most of the hedgerows across the Order Limits at a height of 4-5m AGL as indicated in paragraph 1.3.34 of the LEMP, please refer to Wiltshire Council's Response to ExA's First Written Questions (ExQ1) [REP3-142] , specifically the response to question EB1.18 Hedgerow Heights and Density, together with the council's comments on 9.29 Applicant's Response to the Examining Authority's First Written Questions [REP3-128] , again specifically in relation to question EB1.18 Hedgerow Heights and Density.	The Applicant notes the comments at EB1.18 of ExA's First Written Questions (ExQ1) [REP3-142] and the response provided by the Applicant at EB1.18 in the Applicant's Response to the Examining Authority's First Written Questions [REP3-128]. The Applicant confirms that the management of hedgerows has been revised so that not all hedgerows are managed to 4.5m and there is flexibility in the design to accommodate specific species and management objectives. A revised Hedgerow Height Plan was submitted at Deadline 4-in Annex B of the Written Summary of the Applicant's Oral Submissions and Responses at Issue Specific Hearing 2 and Responses to Action Points

Reference	Theme	Issue	Comments	Applicant's Response
				[REP4-085] which shows hedgerows managed up to 4.5m height. The OLEMP will be updated to reflect this change.
WC1-084	Landscape and Visual	7.18 Outline Landscape and Ecological Management Plan (Rev 2) [REP3-101]	16.3. In summary however, the Council has raised concerns about the intention to maintain all hedgerows across the Order Limits at the height of 4-5m (with the exception of those listed in paragraph 1.3.34 of the LEMP), notably due to the potential for adverse effects on ground-nesting bird species.	The Applicant notes the Council's summarised concern and has provide a responded to the detailed comments above.
WC1-085	Ecology and Biodiversity	7.18 Outline Landscape and Ecological Management Plan (Rev 2) [REP3-101]	16.4. Paragraph 1.3.140 of the LEMP specifies: "The area of mitigation habitat required, and further habitat prescriptions will be set out within the detailed LEMP document. Currently, nine fields are proposed for the provision of ground-nesting bird mitigation habitat, shown in Table 7 below."	The Applicant notes this comment.
WC1-086	Ecology and Biodiversity	7.18 Outline Landscape and Ecological Management	16.5. Table 7 specifies that field numbers B1, B12, C1 and C6, covering a total area of 54 ha, are proposed ground-nesting bird mitigation in the	The Applicant confirms that the management of hedgerows has been revised so that not all hedgerows are managed to 4.5m and there is flexibility

Reference	Theme	Issue	Comments	Applicant's Response
		Plan (Rev 2) [REP3-101]	form of set aside, and field numbers A11, A12, C10, C24 and C28, covering an area of 72.2ha, are proposed diverse wildflower meadow. It is evident that apart from the northern boundary of C1 and the west / southwest boundaries of C1, C6 and C10 which will be managed at a minimum height of 1.5 m, the other fields being put forward as ground-nesting bird mitigation will be managed at a much higher height of 4-5m AGL. The council is not clear why the boundary hedgerows to all the fields being proposed as mitigation for ground-nesting birds cannot also be managed at the lower height of 1.5m in order to maintain open sightlines and reduce vantage points for raptors. The council requests that further justification and consideration is given to this matter.	in the design to accommodate specific species and management objectives. A revised Hedgerow Height Plan was submitted at Deadline 4-in Annex B of the Written Summary of the Applicant's Oral Submissions and Responses at Issue Specific Hearing 2 and Responses to Action Points [REP4-085] which shows hedgerows managed up to 4.5m height. The Outline LEMP [REP3-100] has been updated at Deadline 5 to reflect this change.
WC1-087	Ecology and Biodiversity	7.18 Outline Landscape and Ecological Management Plan (Rev 2) [REP3-101]	16.6. In addition, it is understood that Fields C2, C3 and C4 have been physically removed from the Order Limits red line boundary between PEIR and DCO submission. It is unclear why the Applicant didn't opt to retain these fields within the Scheme boundary and	Fields C2, C3 and C4 were removed from the order limits as these parcels, being on a visually prominent north facing slope, where development would have had a visual impact on the setting of the CNL. They were removed from

Reference	Theme	Issue	Comments	Applicant's Response
			propose their use as additional habitat mitigation areas for ground-nesting birds instead to ensure that sufficient habitat is provided to compensate for the loss of ground-nesting bird habitat.	the Order Limits as they were not directly adjacent to the CNL. As Fields C2, C3 and C4 were removed from the Order Limits at an early stage during the iterative design process for a range of considerations, they were therefore not available for inclusion within the Scheme or for the delivery of ecological mitigation. The Applicant notes that retention of Fields C2, C3 and C4 within the Order Limits solely for ground nesting bird mitigation purposes is unlikely to have resulted in a significantly improved residual outcome, particularly as C4 is likely to be too small and enclosed to represent suitable habitat for ground nesting birds.
WC1-088	Socio-Economics, Tourism and Recreation	7.20 Outline Skills Supply Chain and Employment Plan (Rev 3) [REP3-105]	7.20 Outline Skills Supply Chain and Employment Plan (Rev 3) [REP3-105] 17.1. Wiltshire Council welcome the additions and clarifications the Applicant has provided in this document. Should the scheme be consented, the council will work with the Applicant to ensure the plan is delivered, which is	The Applicant notes this comment.

Reference	Theme	Issue	Comments	Applicant's Response
			considered will help to mitigate some of the economic impact of the scheme.	
WC1-089	Transport and Access	7.22 Outline Construction Traffic Management Plan (Rev 3) [REP3-109]	7.22 Outline Construction Traffic Management Plan (Rev 3) [REP3-109] Section 2.3 Detailed Design 18.1. Previous council comments still apply. The detailed design of permanent highway works is not considered to be an OCTMP matter. The Wiltshire Council Protective Provisions to be included in Schedule 15 to the DCO will cover these requirements and more, such as Bond sums, inspections, indemnity provision and certification. It is suggested this section need only refer to the Protective Provisions or at least reference them.	The Applicant has prepared draft protective provisions for the protection of the Local Highway Authority which have been shared with Wiltshire Council for comment and included as Part 11 of Schedule 15 to the draft DCO [REP4-004]. The Applicant is confident that the form of the protective provisions can be agreed with Wiltshire Council prior to the close of the Examination. Section 2.3 of the Outline CTMP [REP4-057] includes the need to obtain detailed design technical approval of the highway works prior to commencement, including Stage 1-2 Road Safety Audits. It also states that a programme for the works, method statement and any traffic management proposals will be submitted for approval. The preparation, approval and implementation of the final CTMPs, substantially in accordance

Reference	Theme	Issue	Comments	Applicant's Response
				with the Outline CTMP [REP4-057] , are secured through Requirement 15 of Schedule 2 of the Draft DCO [REP4-004] .
WC1-090	Transport and Access	7.22 Outline Construction Traffic Management Plan (Rev 3) [REP3-109]	Section 6.12 Road Condition Surveys 18.2. It remains the council's preference that that all matters relating to the Highway Condition surveys are included in a separate s59 Agreement, as opposed to be subsumed into the OCTMP. It is stated that "The extent of the survey will be agreed with the local highway authority prior to commencement and as part of the Final CTMPs". However, it is unclear as to why this cannot be determined now as all the roads likely to be impacted by extraordinary HGV trafficking are known and so a plan included within a s59 Agreement. It is the council's view that the LDSP HGV construction trafficking along the narrow rural lanes will be extraordinary in the context of the definition set out in s59 of the Highways	Section 59 of the Highways Act 1980 provides for the recovery of excess expenses in the cost of maintaining the highway due to "extraordinary traffic". The Applicant does not consider that the traffic associated with the construction of the Scheme is extraordinary. In any event, the Outline CTMP [REP4-057] provides for road traffic condition surveys and rectification of any damage caused by construction traffic. The inclusion of key highway links requested by WC have been included in Section 6.12. The Applicant is therefore already bound by Requirement 15 in Schedule 2 to the Draft DCO [REP4-004] to rectify any damage to the highways. Please refer to the Applicant's response to Wiltshire Council in respect of DCO1.15 in the Applicant's Response to

Reference	Theme	Issue	Comments	Applicant's Response
			Act. There is thus a concern that the use of the wording "defects that can reasonably be attributable to construction activities at the site" leaves a lot of potential for potential arguments about remediation unless this is accepted by the Applicant.	Other Parties' Responses to Examining Authority's First Written Questions [REP4-081]. It remains open to the Council to recover any excess expenses that it can demonstrate are a consequence of the Scheme under s59 of the Highways Act 1980.
WC1-091	Transport and Access	7.22 Outline Construction Traffic Management Plan (Rev 3) [REP3-109]	18.3. It is not considered that simple video surveys of the roads to be included will suffice. Plans showing each road length to be included will be needed, with a chainage shown and the location of all photographs taken indicated. The latter should include the location of all existing defects found in the pre-construction condition survey. A separate Schedule would additionally be desirable describing the defects with some indication of severity. This may be useful to agree on any pre-emptive highway works, which may be needed to prevent early deterioration caused by regular HGV trafficking.	The Outline CTMP [REP4-057] secures independent surveys to be carried out. Video surveys are the typically accepted standard for recording road condition prior to construction. To the extent additional survey scope is required, this can be considered to the extent it is proportionate and necessary, as part of the final CTMP which is secured by Requirement 15 in Schedule 2 to the Draft DCO [REP4-004] .
WC1-092	Air Quality	9.29 Applicant's Response to the Examining	AQ1.5	The Applicant notes this comment and maintains the position and conclusions set out in its response to Question

Reference	Theme	Issue	Comments	Applicant's Response
		Authority's First Written Questions [REP3-128]	19.1. The Applicant's response to this question from the Examining Authority (ExA) has been reviewed. It includes the following: "In conclusion, the assessment demonstrates that, in the unlikely event of a BESS thermal runaway fire, no significant adverse effects on wildlife, livestock, pets or horses are expected at off-site locations." 19.2. The council has insufficient information regarding species / species group presence / likely absence to be able to verify the conclusion.	AQ1.5 of the Applicant's Response to the Examining Authority's First Written Questions [REP3-128] .
WC1-093	Transport and Access	9.29 Applicant's Response to the Examining Authority's First Written Questions [REP3-128]	DCO1.14 19.3. The Applicant response to general powers conferred under (2) states that "The article provides general power to alter the layout of streets in recognition that, as the detailed design develops, there is potential for works to the highways to be identified as necessary that were not previously known. In such a circumstance, the works may be carried out pursuant to the powers in the	Please refer to response WC1-002 and WC1-003 above. Protective provision for the local highway authority have been included as Part 11 of Schedule 15 to the Draft DCO [REP4-004] .

Reference	Theme	Issue	Comments	Applicant's Response
			Order (rather than needing to rely on provisions of the Highways Act 1980 etc. (Ref 19)), provided always that the consent of the street authority (which, in respect of public highways, will be the local highway authority) is obtained. This general power ensures that unforeseen highway works can be carried out with the agreement of the local highway authority and avoiding the fragmentation of the powers under which such works are carried out". The council position is that that such far-reaching powers beyond the Order Limits are not required or warranted. The 6-week limit for determination / approval under Article 47(4) is a real concern as the council will have no idea as to the scale or complexity of any highway works outside the DCO Order Limits which the Applicant may seek to propose in the future. As such, the council sees no reason why the Applicant should not follow the standard Wiltshire Council s278 Agreement process for developers works to the highway where the works duly required	

Reference	Theme	Issue	Comments	Applicant's Response
			and proposed are outside of the DCO Order Limits.	
WC1-094	Transport and Access	9.29 Applicant's Response to the Examining Authority's First Written Questions [REP3-128]	DCO1.15 19.4. The Applicant has rejected the ExA proposal for extending the 12-month maintenance or defects period where wider LDSP HGV construction trafficking is to continue well beyond this date. It is stated "At the expiry of 12 months, responsibility for maintenance reverts to the street authority. This approach reflects the typical sharing of responsibility for highway works". See above (Draft DCO) [REP3-006] for the council's comments on this point. For early completed highway works, there is a concern that ongoing regular HGV construction trafficking associated with the wider LDSP sites 'could' lead to defects and damage to these works after the normal maintenance period (12-month) expiry. However, the Applicant makes the point that the requirement for periodic highway condition surveys written into the CTMP	Please refer to the Applicant's response to Wiltshire Council's response to DCO1.15 in the Applicant's Response to Other Parties' Responses to Examining Authority's First Written Questions [REP4-081], Protective provisions for the local highway authority have been included as Part 11 of Schedule 15 to the Draft DCO [REP4-004], which include a provisional certificate and final certificate process, as has been noted to be typical, where works are carried out to the highway.

Reference	Theme	Issue	Comments	Applicant's Response
			(or a bespoke s59 Agreement preferred by the council) could cover off highway damages incurred to completed works due to ongoing HGV construction trafficking after the issue of the Final Certificate. This point is accepted.	
WC1-095	Ecology and Biodiversity	9.29 Applicant's Response to the Examining Authority's First Written Questions [REP3-128]	DCO1.47 19.5. The Applicant's response includes the following statement: "The Applicant is satisfied that the plans for decommissioning and restoring the land are inherent in the outline Decommissioning Strategy, and provision of an outline Restoration Plan would only duplicate the measures set out within the Outline Decommissioning Strategy [REP1 100]." 19.6. This is at odds with the council's Ecology Officer's response to this question in its response to the ExA.	The Applicant notes this comment and maintains its position that the Outline Decommissioning Strategy [REP3-096] makes effective provision for the restoration of land.
WC1-096	Ecology and Biodiversity	9.29 Applicant's Response to the	EB1.10	The Applicant acknowledges this comment and agrees that impacts could

Reference	Theme	Issue	Comments	Applicant's Response
		Examining Authority's First Written Questions [REP3-128]	19.7. The council's Ecology Officer is in general agreement with the Applicant's response to question EB1.10 to the ExA but suggests that the protective buffer zones may not be wide enough to fully encompass the areas within which impacts could occur. The Applicant likewise appears to be aware of this potential issue as their response specifies that the undeveloped buffers encompass most of the area in which impacts are likely to arise from beaver activity; the inference being that the buffer zones may not cover the entire area within which impacts could occur.	occur beyond the protective buffer zones. However, the Applicants notes that, should beaver activity result in impacts that are detrimental to the operation of the Scheme, whether within or beyond the undeveloped buffers, a range of management options would be available to the Applicant to address such impacts and resolve any resulting conflicts. Some of the best practice available measures have been highlighted in the Applicant's response to question EB1.10 within the Applicant's Response to the Examining Authority's First Written Questions [REP3-128] .
WC1-097	Ecology and Biodiversity	9.29 Applicant's Response to the Examining Authority's First Written Questions [REP3-128]	19.8. The council considers that the ES Volume 1, Chapter 9: Ecology and Biodiversity (Rev 2) [REP1-016] , the Outline Ecological Protection and Mitigation Strategy (EPMS) (Rev 3) [REP3-103] and the Outline Landscape and Ecological Management Plan (LEMP) (Rev 2) [REP3-101] are updated to incorporate and expand upon as required, the measures discussed in the Applicant's Response	The Applicant notes this comment and highlights that measures designed to avoid impacts on, and reduce conflicts with, riparian mammals (including beavers) during construction of the Scheme are already secured within the Outline EPMS [REP4-055] . During the Operation and Maintenance Phase, beaver management measures would only be considered where the presence of beavers within the Solar PV

Reference	Theme	Issue	Comments	Applicant's Response
			to this question in order to ensure that this matter is covered within the ES and control documents.	Sites has been confirmed and, following an assessment of the circumstances, where beaver activity is considered likely to adversely affect the operation of the Scheme. Any management measures would be informed by the nature and extent of the specific impactful activity (for example, dam building or foraging activity) and would be developed accordingly. As beavers are not currently known to be present within the Solar PV Sites, the Applicant does not consider it necessary or proportionate to include details of speculative operational beaver management measures within the Outline LEMP [REP3-101] or ES Volume 1, Chapter 9: Ecology and Biodiversity [REP4-010]. However, a note on the general management approach should beavers be identified at the Scheme in future has been added to a revised Outline LEMP [REP3-100] for submission at Deadline 5.

Reference	Theme	Issue	Comments	Applicant's Response
WC1-098	Ecology and Biodiversity	9.29 Applicant's Response to the Examining Authority's First Written Questions [REP3-128]	EB1.13 19.9. The Applicant's response is noted, however, the council has insufficient information to be able to agree or corroborate the conclusions therein.	The Applicant notes this comment and maintains the position and conclusions set out in its response to Question EB1.13 of the Applicant's Response to the Examining Authority's First Written Questions [REP3-128] .
WC1-099		9.29 Applicant's Response to the Examining Authority's First Written Questions [REP3-128]	EB1.18 19.10. The council's Ecology Officer concurs with a number of the points made in the Applicant's response. However, the response does not identify or discuss that maintaining all hedgerows within the Order Limits at a height of 4.5m above ground level (AGL) will reduce the structural diversity of the hedgerows, which in turn could have an adverse effect on species diversity and /or abundance.	The Applicant notes that structural diversity of the existing hedgerow network may be reduced although this does not equate a uniform structure of hedgerows being maintained across the Solar PV Sites. As set out within the Outline LEMP [REP3-100] , hedgerows would be managed on a rotational basis, ensuring that not all hedgerows are cut within the same year and allowing a range of hedge ages, structures and growth forms to develop across the Scheme. Furthermore, a number of existing hedgerows and most newly planted hedgerows within the Solar PV Sites do or will contain frequent hedgerow trees. These trees would continue to provide

Reference	Theme	Issue	Comments	Applicant's Response
				vertical structural diversity in excess of 4.5 m, together with associated ecological functions including nesting, sheltering, foraging and commuting opportunities for birds, bats and other wildlife. Consequently, whilst hedgerow shrubs will be managed to maintain target heights, a structurally diverse hedgerow network would be retained through the combination of rotational hedgerow management and the continued presence of frequent hedgerow trees. Notwithstanding, the Applicant confirms that the management of hedgerows has been revised so that not all hedgerows are managed to 4.5m and there is flexibility in the design to accommodate specific species and management objectives. A revised Hedgerow Height Plan was submitted at Deadline 4-in Annex B of the Written Summary of the Applicant's Oral Submissions and Responses at Issue Specific Hearing 2 and Responses to Action Points [REP4-085]

Reference	Theme	Issue	Comments	Applicant's Response
				which shows hedgerows managed up to 4.5m height. The Outline LEMP [REP3-100] has been updated at Deadline 5 to reflect this change.
WC1-100	Ecology and Biodiversity	9.29 Applicant's Response to the Examining Authority's First Written Questions [REP3-128]	19.11. In response to question EB1.18 from the ExA, the council specified that the management of hedgerows to a height of 4.5m AGL, especially newly planted hedgerows, within ecology mitigation areas such as those for ground nesting birds, including skylark and yellow wagtail, could in effect obstruct and 'close' currently open views needed by such species, and may increase predation due to an increase in elevated vantage points and perch sites for raptors.	The Applicant notes this comment and refers to the response provide for EB1.18 in the Applicant's Response to the Examining Authority's First Written Questions [REP3-128]. .
WC1-101	Ecology and Biodiversity	9.29 Applicant's Response to the Examining Authority's First Written Questions [REP3-128]	19.12. Similarly, the Applicant's response states: "It is possible that increases in hedgerow height from baseline levels may reduce the suitability of fields for ground-nesting bird species, such as skylark, that rely on open-sightlines when nesting." The response then specifies: "In order to	The Applicant notes the response provided previously.

Reference	Theme	Issue	Comments	Applicant's Response
			compensate for the loss of suitable skylark habitat within the Solar PV Sites as a result of the Scheme, and to mitigate for the resulting loss of skylark breeding territories as detailed within ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015], nine fields within the Order Limits are proposed as ground-nesting bird mitigation habitat. These fields have been selected based on their large size, limited extent of adjacent woodland, and few potential vantage points for predators. An increase in hedgerow height from baseline levels to 4.5m is not considered to compromise the ability of these fields to deliver mitigation for ground nesting birds, as areas of ground-nesting bird mitigation habitat are proposed in fields that meet the above criteria and the height of hedgerows are thus not critical."	
WC1-102	Ecology and Biodiversity	9.29 Applicant's Response to the Examining Authority's First Written	19.13. The council cannot corroborate the conclusion put forward in the last sentence of the aforementioned extract which seems to conflict with the first sentence of the extract, and considers	The Applicant acknowledges that as a general rule increases in hedgerow height can reduce the suitability of farmland for skylark by restricting open sightlines and increasing the availability

Reference	Theme	Issue	Comments	Applicant's Response
		Questions [REP3-128]	that insufficient information has been included within the response to substantiate that the open sightlines would not be obstructed, especially if fields to be set-aside as mitigation for ground-nesting birds and which lie adjacent to each other are intersected / bordered by hedgerows which will be maintained at a height of 4.5m AGL.	of elevated vantage points for predators. However, the ground-nesting bird mitigation fields have been selected following consideration of a range of characteristics, with particular emphasis placed on their large size and relatively flat topography. These characteristics provide extensive areas of open habitat well away from field boundaries and other edge features. Other selection criteria considered was the influence of adjacent woodland and the absence of other features that could provide elevated vantage points for predators, such as tall in-field trees away from field boundaries. Whilst some mitigation fields are bounded by hedgerows that will be managed at up to 4.5 m above ground level, the Applicant does not consider that this would materially reduce the effectiveness of the mitigation. The extensive size and open nature of the selected fields mean that suitable nesting habitat remains available at substantial distances from field boundaries, such that skylarks are not

Reference	Theme	Issue	Comments	Applicant's Response
				reliant on maintaining low hedgerows around the entirety of the selected field perimeter. Consequently, although hedgerow height is a relevant consideration, it is not the primary factor influencing the selection of mitigation fields and is not considered critical to their ability to deliver the intended mitigation. The Applicant therefore maintains that the proposed ground-nesting bird mitigation areas remain suitable to compensate for the predicted loss of skylark breeding habitat and that the management of adjacent hedgerows of up 4.5 m does not undermine this conclusion. Notwithstanding, the Applicant confirms that the management of hedgerows has been revised so that not all hedgerows are managed to 4.5m and there is flexibility in the design to accommodate specific species and management objectives, including at hedgerows bordering skylark mitigation areas. A revised Hedgerow Height Plan was submitted at Deadline 4-in Annex B of

Reference	Theme	Issue	Comments	Applicant's Response
				the Written Summary of the Applicant's Oral Submissions and Responses at Issue Specific Hearing 2 and Responses to Action Points [REP4-085] which shows hedgerows managed up to 4.5m height. The Outline LEMP [REP3-100] will be updated for Deadline 5 to reflect this change.
WC1-103	Ecology and Biodiversity	9.29 Applicant's Response to the Examining Authority's First Written Questions [REP3-128]	19.14. As such, the council questions why it is necessary for the hedgerows bordering the fields that are to be set-aside and used as mitigation for ground-nesting birds, to be maintained at 4.5m AGL. The council suggests that instead these hedgerows should be maintained at a lower height to ensure there are open sightlines and that any current unobstructed or relatively unobstructed views remain so.	The Applicant notes the comments at EB1.18 of ExA's First Written Questions (ExQ1) [REP3-142] and the response provided by the Applicant at EB1.18 in the Applicant's Response to the Examining Authority's First Written Questions [REP3-128]. The Applicant confirms that the management of hedgerows has been revised so that not all hedgerows are managed to 4.5m and there is flexibility in the design to accommodate specific species and management objectives. A revised Hedgerow Height Plan was submitted at Deadline 4-in Annex B of the Written Summary of the

Reference	Theme	Issue	Comments	Applicant's Response
				Applicant's Oral Submissions and Responses at Issue Specific Hearing 2 and Responses to Action Points [REP4-085] which shows hedgerows managed up to 4.5m height. The Outline LEMP [REP3-100] has been updated for Deadline 5 to reflect this change.
WC1-104	Landscape and Visual	9.29 Applicant's Response to the Examining Authority's First Written Questions [REP3-128]	LV1.1 19.15. The council understand the question was directed to the Applicant seeking further clarity surrounding the effects to the soft landscape fabric components, and the extent to which proposed planting is for the purposes of mitigation or enhancement. The Applicant was asked by the ExA to "quantify the following by planting typology: 1) Loss of landscape fabric components. 2) Additional landscape fabric components, including both mitigation and enhancement measures.	Please see the Applicant's Response to the Examining Authority's First Written Questions [REP3-128].

Reference	Theme	Issue	Comments	Applicant's Response
			3) Extent of proposed planting under point 2) above that would be required for the purpose of mitigating adverse landscape or visual effects. 4) Extent of proposed planting under point 2) above that would be for enhancement only."	
WC1-105	Landscape and Visual	9.29 Applicant's Response to the Examining Authority's First Written Questions [REP3-128]	19.16. In response to questions 1-4, the Applicant has provided tabled information within [REP3-128] attached as Annex C LV1.1 – Landscape Fabric – Quantifying Loss and Provision.	The Applicant notes this comment.
WC1-106	Landscape and Visual	9.29 Applicant's Response to the Examining Authority's First Written Questions [REP3-128]	19.17. The council notes that within 'Table 4 - Extent of proposed planting under item 2 (above) that would be for enhancement only', the Applicant has included under 'proposed groundcover' 47.18 hectares of 'Proposed ground nesting bird mitigation set-a-side land.' The council questions this inclusion under 'enhancement only' for two reasons. The first is that set-a-side is still technically arable / agricultural land	The Applicant has not simply sought to mitigate effects associated with the Development. Using the avoidance measures embedded within the Scheme the Applicant has retained land within the Order limits to provide positive enhancements within the setting of the CNL. With reference to the CNL Board's Submissions Received at Deadline 3

Reference	Theme	Issue	Comments	Applicant's Response
			in a state of rest and would need cultivation on a rotational basis (typically 3-5 years) so this would be a neutral effect in terms of groundcover, and the second is that if this land is required to mitigate specific ecological harms caused by the development how can it be considered as enhancement only.	[REP3-154] the CNL Board have confirmed that: "Notwithstanding the Board's conclusions on the net harm to the Cotswolds National Landscape arising from the Scheme, we consider that the Applicant has sought to further its natural beauty through the proposed enhancement measures located in the setting of the CNL, including some of those outlined at Table 19 of ES Appendix 8-6 such as 60 hectares of wildflower meadow and 63 hectares of set aside for ground nesting birds. These would comprise enhancements to the CNL's setting above and beyond the current baseline condition on land which is visually connected to, and has a complementary landscape character to, the adjacent CNL".
WC1-107	Landscape and Visual	9.29 Applicant's Response to the Examining Authority's First Written	19.18. The council questions whether the total for proposed groundcover enhancement within Table 4 should be 57.62 hectares and not 104.80 hectares as currently included.	The Applicant is confident in their figures contained within Table 4.

Reference	Theme	Issue	Comments	Applicant's Response
		Questions [REP3-128]		
WC1-108	Landscape and Visual Arboriculture	9.29 Applicant's Response to the Examining Authority's First Written Questions [REP3-128]	LV1.3 19.19. In response to ExA's request for a plan, the Applicant has provided an annotated version of the 'Tree Protection Order and Hedgerow plan' [APP-011] to show hedgerows which would be managed to a height of 4.5m.	Please see the Applicant's Response to the Examining Authority's First Written Questions [REP3-128] .
WC1-109	Landscape and Visual Arboriculture	9.29 Applicant's Response to the Examining Authority's First Written Questions [REP3-128]	19.20. The council raises concern in relation to the proposed holistic management of all existing and new hedgerows within the order limits at 4.5 metre heights on this Hedgerow Height Plan (Annex D LV1.3) [REP3-128] , noting single exception at Alderton Road, where hedgerows are proposed to be maintained at existing baseline heights, circa 1.4m high to conserve the existing open aspect with the CNL across Alderton Road.	The Outline LEMP [REP3-100] sets out the proposed ongoing General Management Prescriptions for all vegetation within the Order Limits, including hedgerows. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, which would be required to be substantially in accordance with the Outline LEMP [REP3-100] , is secured through Requirement 7 in Schedule 2 of the Draft DCO [REP4-004] .

Reference	Theme	Issue	Comments	Applicant's Response
WC1-110	Landscape and Visual	9.29 Applicant's Response to the Examining Authority's First Written Questions [REP3-128]	19.21. The council considers that the mitigation could and should differentiate between those hedgerows within the order limits that are being relied upon to provide screening and those that are not, with a view to maintaining hedgerows at lower existing levels where they are not being relied upon for screening purposes. The council understands that 4.5m high hedgerows are proposed to provide long term visual screening of renewable energy scheme components and substations, so the council is confused as to why all short sections of hedgerow within and crossing the CRC are proposed to be managed at 4.5m heights, given the nature of the works are primarily underground and long-term visual mitigation is not required.	Please see Annex B of the Written Summary of the Applicant's Oral Submissions and Responses at Issue Specific Hearing 2 and Responses to Action Points [REP4-085] where the Applicant has provided an updated drawing setting the management of hedgerows to be managed ' <u>up to</u> ' 4.5m height.
WC1-111	Landscape and Visual	9.29 Applicant's Response to the Examining Authority's First Written	LV1.4 19.22. The council notes the question was for the Applicant. The ES [APP-060] states there would be moderate beneficial effects to landscape fabric	The Applicant notes this comment but respectfully disagrees with WC on this point.

Reference	Theme	Issue	Comments	Applicant's Response
		Questions [REP3-128]	from year 15 of the operational phase and in the decommissioning phase as a result of proposed planting measures. The Applicant is asked: 1) Can this be considered a benefit of the proposed development in relation to landscape effects if it would only be there to provide mitigation screening for a large-scale solar development which itself would have significant adverse effects on landscape and visual receptors? 2) If proposed planting measures are deemed inappropriate to the character of the receiving landscape due to size or species mix proposed, can it be considered to be a landscape fabric benefit? 19.23. In the council's opinion the Applicant doesn't answer either of these two questions within their written response to ExQ1 LV1.4.	

Reference	Theme	Issue	Comments	Applicant's Response
WC1-112	Landscape and Visual	9.29 Applicant's Response to the Examining Authority's First Written Questions [REP3-128]	19.23. In the council's opinion the Applicant doesn't answer either of these two questions within their written response to ExQ1 LV1.4.	The Applicant notes this comment but respectfully disagrees with WC on this point.
WC1-113	Landscape and Visual	9.29 Applicant's Response to the Examining Authority's First Written Questions [REP3-128]	LV1.6 19.24. The first part of this question is for the Council and Stop Lime Down, while the second part is directed to the Applicant. The council has answered the first part of this question within its response to ExQ1 LV1.6 at page 38-39 [REP3-142] . The council notes the Applicant's response to the second part of this question but does not agree with the Applicant's justification of their approach to their assessment of landscape character (or assessment of landscape components (fabric) informing and feeding into the separate assessment of character).	The Applicant directs WC to the Statement of Common Ground with Wiltshire Council [REP4 – 061] where it is agreed that ' <i>The LVIA methodology follows standard best practice (GLVIA 3)</i> '.

Reference	Theme	Issue	Comments	Applicant's Response
WC1-114	Landscape and Visual	9.29 Applicant's Response to the Examining Authority's First Written Questions [REP3-128]	19.25. 'Wiltshire Council considers the Applicant's approach departs from the standard typical approach for assessment of landscape effects upon specific landscape character types and areas. Specific landscape character types and areas were identified as distinct landscape receptors and scoped in for assessment by ExA at EIA scoping stage. The assessment has not been carried out on this receptor basis.'	The Applicant directs WC to the Statement of Common Ground with Wiltshire Council [REP4 – 061] where it is agreed that '<i>The LVIA methodology follows standard best practice (GLVIA 3)</i>', and that GLVIA3 does not suggest that an LVIA should consider individual Landscape Character Areas (LCAs) or Landscape Character Types (LCTs) as individual Landscape Receptors, rather that LCAs / LCTs are used to identify the Baseline. ES Volume 1, Chapter 8 Landscape and Visual [REP3-025] has undertaken a robust assessment on Landscape Character which has included a thorough review and assessment of the impacts of the Scheme on Landscape Character. the individual Key Characteristics for the relevant Landscape Character Areas and Types formed a key consideration in forming the overall judgments of the effects of the scheme on Landscape Character.

Reference	Theme	Issue	Comments	Applicant's Response
				Following ISH 2, the applicant is preparing a Landscape Character Assessment of Character Areas following a request by the ExA (Action Point 14 and 15). This will be submitted at Deadline 5 and will consider the effects of the Lime Down Scheme on the key characteristics; inherent landscape sensitivities; and broad management objectives for the Landscape Types and corresponding Landscape Character Areas as defined in the Wiltshire County Assessment and the Local North Wiltshire Assessments.
WC1-115	Landscape and Visual	9.29 Applicant's Response to the Examining Authority's First Written Questions [REP3-128]	19.26. The council notes within the Applicant's justification for their approach "This approach ensures that the assessment looks at the effects of the Scheme on the unique holistic patchwork of landscape character within each Study Area and avoids focusing the assessment on the effects to individual local or national LCAs where it would be difficult to then ascertain the effect of the Scheme on landscape character as a whole."	Please see the Applicants response to 19.25 above.

Reference	Theme	Issue	Comments	Applicant's Response
WC1-116	Landscape and Visual	9.29 Applicant's Response to the Examining Authority's First Written Questions [REP3-128]	19.27. The council considers that the Applicant should have carried out their holistic assessment of the patchwork of landscape character as a logical final step in the landscape assessment process (bringing everything together), rather than not including landscape character types and character areas as specific landscape receptors. The boundaries of landscape character types and areas are not arbitrary lines, their boundaries align with distinctive character changes, some abrupt others more subtle. The assessment of specific unique character types and areas would help the Applicant better understand how the scheme impacts and influences key features and distinctive character attributes of the landscape and the condition of the landscape in different areas and would assist with their holistic assessment. It certainly wouldn't prevent the Applicant from carrying out a holistic assessment of landscape character as a final stage in the process.	Please see the Applicants response to 19.25 above.

Reference	Theme	Issue	Comments	Applicant's Response
WC1-117	Landscape and Visual	9.29 Applicant's Response to the Examining Authority's First Written Questions [REP3-128]	LV1.7 19.28. This question was directed to the Applicant. The council notes the Applicant's response to Question 1, "the reduction in the significance of landscape effects at year 15 of operation is as a result of the maturing mitigation measures within the Sites which will, as it matures, strengthen the level of vegetation and assimilate the development into the landscape."	The Applicant notes this comment.
WC1-118	Landscape and Visual	9.29 Applicant's Response to the Examining Authority's First Written Questions [REP3-128]	19.29. The council does not agree that the visual mitigation strategy (higher hedgerow management and introduced screen planting) will substantially change the significance of effects for landscape character at year 15. The Applicant's consideration of resulting character effects relies on the visual mitigation strategy to achieve this reduced effect for character. It also relies on a partial assessment of landscape components (fabric). Also important to consider in this regard is that the visual assessment confirms that	The ES Volume 1, Chapter 8 Landscape and Visual [REP3-025] acknowledges that there would be there would be an immediate change to the character of the Sites themselves and their immediate surroundings as they change from an area of arable farmland to solar infrastructure with the LVIA recording Significant Adverse effects on the character of the Landscape (including within the Lime Down Sites) through to the establishment of the Mitigation planting as a result of the

Reference	Theme	Issue	Comments	Applicant's Response
			numerous visual receptors assessed at year 15 as illustrated in some cases by the year 15 photomontages demonstrate that some panel areas and substations located on rolling ridgelines, or where visual receptors are slightly elevated, or where development areas are on slightly higher topography will remain visible beyond year 15. 19.30. The council maintains its position as presented within its Local Impact Report [REP1-137] that significant adverse effects for landscape character will remain until the energy infrastructure scheme is decommissioned and removed from the landscape.	Scheme and the change from agricultural land to a solar infrastructure. However, the introduction of the solar arrays and other associated infrastructure would not become a defining feature on the landscape once operational, with the establishment of the landscape mitigation by Year 15 reducing adverse effects on Landscape Character within the 1km Study Area to no longer Significant.
WC1-119	Landscape and Visual	9.29 Applicant's Response to the Examining Authority's First Written Questions [REP3-128]	LV1.9 19.31. The parties were asked to define in spatial extents the setting to the CNL. The council provided its response to ExQ1- LV1.9 in [REP3-142].	The Applicant notes this comment.

Reference	Theme	Issue	Comments	Applicant's Response
WC1-120	Landscape and Visual	9.29 Applicant's Response to the Examining Authority's First Written Questions [REP3-128]	19.32. The council notes the Applicant's submission of a plan 'Spatial Extent of the Setting of the Cotswolds National Landscape' included as Annex E, LV1.9 [REP3-128] in their response to the first part of this question. This plan is understood to define the spatial extent of the setting of the CNL as far as the Applicant is concerned.	The Applicant notes this comment.
WC1-121	Landscape and Visual	9.29 Applicant's Response to the Examining Authority's First Written Questions [REP3-128]	19.33. The council considers that setting to the CNL should be considered and can be impacted in different ways. Defining the setting to a National Landscape needs to consider both physical landscape components and perceptual and visual qualities that together define its character and special qualities.	The CNL Board (In its Position Statement – Development in the setting of the Cotswolds AONB) considers the setting of the Cotswolds AONB to be: <i>“...the area within which development and land management proposals, by virtue of their nature, size, scale, siting materials or design can be considered to have an impact, positive or negative, on the landscape, scenic beauty and special qualities of the Cotswolds AONB”.</i> The Statement clarifies references to setting from the Cotswolds AONB Management Plan:

Reference	Theme	Issue	Comments	Applicant's Response
				<i>"The surroundings of the Cotswolds AONB are also important to its landscape character and quality. There are views out of the AONB and across back into land within the AONB and views towards or into it from surrounding areas, all of which can be very significant. Development proposals that affect views into and out of the AONB need to be carefully assessed to ensure that they conserve and enhance the natural beauty and landscape character of the AONB".</i> The reference to views to and from the CNL in the above quote implies that intervisibility is a key factor in determining the extent of the CNL's setting. Section 85 of the Countryside and Rights of Way Act 2000 (CRoW) provides that relevant authorities have a duty to seek to further the purpose of conserving and enhancing the natural beauty of the National

Reference	Theme	Issue	Comments	Applicant's Response
				Landscapemeaning developments near a National Landscape must carefully evaluate and minimise adverse visual or environmental impacts on the protected zone. Setting does not have a fixed boundary and is evaluated on a case-by-case basis depending on the scale of proposed changes and the potential effect on the receiving landscape. A detailed assessment of the extent of the setting was undertaken as part of the iterative design process and included site visits with the CNL Board officer where field by field discussion took place in relation to the setting of the CNL. For instance, fields C1, C2, C3 and C4 were considered to be in the setting of the CNL where development would have a significant adverse effect on the CNL The fields were subsequently removed from the Scheme. Conversely development in FieldsC5, C29, C30 beyond the

Reference	Theme	Issue	Comments	Applicant's Response
				ridgeline or at distance where not considered to cause significant effects. As there are no direct impacts on the CNL as a result of solar infrastructure, intervisibility is the key factor in determining the extent of CNLs setting. intervisibility (defined as the mutual line of sight between two points) is primarily affected by a number of factors: • <i>Topography - terrain & elevation: High ground (like ridges, peaks, or convex slopes) blocks visibility, creating "dead ground" where objects fall below the line of sight);</i> • <i>Physical Obstacles: Vegetation, forests, and man-made structures (buildings, communication towers) obstruct direct sightlines;</i> • <i>the Earth's curvature: Over long distances (typically beyond 5 km on flat terrain), the curvature of the Earth causes the surface to drop out of the line of sight; and</i>

Reference	Theme	Issue	Comments	Applicant's Response
				<i>Distance: Even without obstructions, distance degrades object recognition and resolution for the human eye.</i> <i>Solar infrastructure in Field C7 was tested through the production of Sections (submitted into the Examination as Annex F in response to the Examiners Question LV1.11 [REP3-128]). It is noted that "The CNLB support the decision to remove Solar PV Panels in the remainder of Field C6 and note field C7 has been tested through sections to show that visibility would be limited (Ref 3.1.19 of the Statement of Common Ground with Cotswolds National Landscape Board [REP2-029]).</i> In consideration of the above and with reference ES Volume 3, Appendix 8.6: Assessment of Effects on the Cotswolds National Landscape and its Special Qualities [APP-197] the applicant has prepared a plan showing the Spatial Extent of Setting of the CNL which was submitted within the

Reference	Theme	Issue	Comments	Applicant's Response
				Applicant's Response to the Examining Authority's First Written Questions [REP3-128]. The 14 SQs are key elements that have been identified within the area that have prompted it to be designated as worthy of National Landscape designation. As set out in the Cotswolds National Landscape Management Plan within Chapter 4, the Special Qualities of the CNL, are presented as: <i>“those aspects of the area’s natural beauty which make the area distinctive and which are considered valuable, especially at a national scale. They are the key attributes on which the priorities for its conservation, enhancement and management are based. They bring out the essence of the National Landscape as an evocative description of the area rather than as a statistical account.”</i> The potential effects of the Scheme on the special qualities of the CNL are

Reference	Theme	Issue	Comments	Applicant's Response
				assessed within ES Volume 3, Appendix 8.6: Assessment of Effects on the Cotswolds National Landscape and its Special Qualities [APP-197]. The Applicant considers the setting of the CNL to extend across parts of Lime Down A, B and C, but not across the entirety of the three sites. The Applicants position is that the setting for the CNL extends as far as to where development or land management proposals, can be considered to have an impact (positive or negative) upon the CNL.
WC1-121	Landscape and Visual	9.29 Applicant's Response to the Examining Authority's First Written Questions [REP3-128]	19.34. The council disagrees with the Applicant's defined spatial extent of the setting of the CNL and considers that the field areas have been identified and included largely on the basis of adjacent physical proximity to the CNL boundary or where field parcels had the greatest visibility from within the CNL. While the plan(s) identifies individual field parcels within the DCO Limits, the plan doesn't	Please see the Applicants response to 19.33 above.

Reference	Theme	Issue	Comments	Applicant's Response
			attempt to define the setting for this part of the CNL impacted by the development.	
WC1-122	Landscape and Visual	9.29 Applicant's Response to the Examining Authority's First Written Questions [REP3-128]	LV1.19 19.35. Following the opportunity to view the relationship of site areas during ExA ASI 1 [EV5-001] from habitable rooms inside two of these worst impacted residential properties and from their associated garden areas, the council agrees with the Applicants' justification and reasoning included in their written response to this question.	The Applicant notes this comment.
WC1-123	Landscape and Visual	9.29 Applicant's Response to the Examining Authority's First Written Questions [REP3-128]	19.36. The council confirmed to the ExA verbally during the course of hearing discussions at ISH2 that it no longer considers that a Residential Visual Amenity Assessment is required for any residential dwelling contained within the DCO Order Limits (Site Areas A to E), based on the high-level thresholds required to trigger RVAA assessment. The council considers that the assessment scores for these residential receptors as currently included within the Applicant's LVIA are sufficient to	The Applicant notes this comment.

Reference	Theme	Issue	Comments	Applicant's Response
			inform the ExA on appropriate levels of resulting harm for these impacted residential receptors.	
WC1-124	Landscape and Visual	9.29 Applicant's Response to the Examining Authority's First Written Questions [REP3-128]	LV1.26 19.37. The council acknowledges this was a question for the Applicant to explain how the proposed access points from the public highway would be designed to be appropriate to the receiving landscape character and minimise impacts on landscape and visual receptors. The Applicant's response was requested to also include its position on whether there should be tighter controls within the Design Principles and Parameters [REP1A-008] to ensure that the design of access points would be appropriate to the receiving landscape character.	The Applicant notes this comment.
WC1-125	Landscape and Visual	9.29 Applicant's Response to the Examining Authority's First Written	19.38. The council notes the Applicant's comments in relation to the permanent change to landscape character associated with the planting of a secondary screening hedgerow at retained operational site access points	Effects of access points have been fully assessed on a worst case scenario Rochdale envelope basis The visual effects of these concluded in the LVIA are provided at [APP-192]

Reference	Theme	Issue	Comments	Applicant's Response
		Questions [REP3-128]	(referred to as 'hedge line hooks' during ISH2 by the Applicant). However, the council views the addition of short sections of a secondary hedgerow locally associated with site access points as small-localised changes, which would not be out of keeping with the rural character, to be preferable to the alternative of leaving open public views of solar PV infrastructure through these physical gaps and over any associated lowered hedge lines to maintain entrance visibility splays for the 60 year life of the scheme.	The mitigation recommended is set out in the LVIA [REP3-025] in table 8-12 and includes Retention of existing woodland/scrub and hedgerow cover (other than where required for access). This vegetation provides a strong visual framework and potentially screens or substantially filters views at ground level towards the Scheme. Existing hedgerows are to be allowed to grow out and will be managed to a height of 4.5m. Hedgerow trees will be encouraged to grow out to add further thickening and growth to field boundaries. • All hedgerows bordering the CNL within Site C (including hedgerow SH3) are to be maintained to a height of c1.5m (or as existing if greater) to maintain open views of the landscape within the setting of the CNL. • Mitigation is also shown on APP-084 and where aligned to existing landscape features new

Reference	Theme	Issue	Comments	Applicant's Response
				hedgerow planting has been provided near site access points. Given those conclusions the Applicant does not see a justification for a secondary hedgerow and in any event the Council itself acknowledges this is not characteristic of the area.
WC1-126	Landscape and Visual	9.29 Applicant's Response to the Examining Authority's First Written Questions [REP3-128]	LV1.27 19.39. While it was understood that this question was for the Applicant to provide further explanation of how the energy storage facility (Work No. 2) and the onsite substations (Work No. 3) would be capable of being laid out and designed (including through use of colour and materials) in order to promote the best possible aesthetic and visual appearance and to minimise landscape and visual effects, the Council comments as follows on the Applicant's written response to this question.	The Applicant notes this comment.

Reference	Theme	Issue	Comments	Applicant's Response
WC1-127	Landscape and Visual	9.29 Applicant's Response to the Examining Authority's First Written Questions [REP3-128]	19.40. The council notes the Applicant references within their response 7.4 Design Principles and Parameters (Rev 2) [REP1A-007] (note the council considers the reference should be to [REP1A-008] Work No.2(b) BESS Container Commitment. This states that BESS containers <u>will be</u> externally finished to be in keeping with the prevailing surrounding environment with the <u>exact colour subject to manufacturer specifications and agreed with the relevant planning authority prior to construction</u> . That ' <u>colours will be carefully selected in subdued, non-reflective tones to sit as discreetly as possible within the landscape.</u> '	The Applicant notes this comment and provides a fuller response immediately below.
WC1-128	Landscape and Visual	9.29 Applicant's Response to the Examining Authority's First Written Questions [REP3-128]	19.41. During the course of discussions at ISH2 (Landscape and Visual), it became apparent to the council that there is no certainty that BESS containers would be controlled and externally finished as described, and not for example end up being white in colour due to manufacturer specification or availability and further design considerations including around safety	The Applicant has addressed this point in the Written Summary of the Applicant's Oral submissions and Responses at Issue Specific Hearing 2 and Responses to Action Points [REP4-085] (see Action Point 22). Given the nature of the Scheme, there is limited opportunity to influence the

Reference	Theme	Issue	Comments	Applicant's Response
			(to reflect sunlight / heat). Practically speaking, the council will have little or no option but to approve white BESS containers at detailed design stage, should the Applicant assert no other options are available at point of detailed submission, despite the Applicant's design / aesthetic commitments included under Work No.2b. The commitment is in effect toothless in so far as it relates to BESS containers.	palette of colours being proposed, although, the Design Principles and Parameters [REP4-043] commits to the use of subdued, non-reflective tones, subject to manufacturers specifications, for conversion units, BESS containers, control buildings and CCTV and monitoring equipment. This approach will aid absorption of these components within the landscape, with colours to be agreed with the relevant planning authority under Requirement 5 of the draft DCO [REP4-004] prior to construction. As part of the discharge of requirement process, the Applicant would undertake informal consultation before submitting applications to discharge requirements, which provides an opportunity for the relevant planning authority to provide feedback on the proposed colours.
WC1-129	Landscape and Visual	9.29 Applicant's Response to the Examining Authority's First Written	19.42. Alongside the colour treatment of this new fabric component, the council notes that the Applicant proposes to surround and visually screen the BESS compound and its containers with a 2m high x 3m wide earth bund constructed	The bund is proposed at 2m tall, with a 3m acoustic barrier atop. The cross-sectional width of the bund is proposed at 20m wide which allows for a 1in2 internal slope (facing the BESS) a 3m

Reference	Theme	Issue	Comments	Applicant's Response
		Questions [REP3-128]	from excavated site soils, with a 2m high acoustic fence on top and tree and scrub planting on the outward facing slopes of this bund. Given these containers could be finished in white, the council supports the use of soil bunds to provide screening for this development component. However, the council highlights that a 2m high bund with a 3m wide cross-sectional footprint, could only be constructed as a triangular pointed bund. The council considers that bund profiles will require a rounded or flat-topped profile of at least a metre width in order to structurally support a 2m high solid fence susceptible to wind throw forces.	level bund top and then a 1in6.5 (or 12.99 degrees) external slope that is proposed for planting.
WC1-130	Landscape and Visual	9.29 Applicant's Response to the Examining Authority's First Written Questions [REP3-128]	19.43. The council also considers that the Applicant's proposed bund slope profiles are unlikely to be achieved at slopes greater in angle than 45 degrees (absolute worst case). Assuming 45 degree slope angles are the maximum parameters employed for construction of this bund (1 in 1 gradients), the cross sectional footprint requirement for a 2m high bund would be 4m at base (with a	The Applicant has not proposed any defined bund profiles. The Outline Soil Resources Management Plan (SRMP) [REP4-053] specifies the maximum height of stockpiles (3m for topsoil or 4.5m for subsoil) and the maximum side slope for long-term stockpiles (1 in 2, or 25°). Exact dimensions of individual stockpiles have not been specified at this outline stage but will be determined

Reference	Theme	Issue	Comments	Applicant's Response
			pointed bund top), but more likely to be in the region of <u>minimum 5m width</u> at base (with a 1m wide rounded or flat bund top), <u>not the 3m width stated by the Applicant for a 2m high bund</u> . The Applicant's currently proposed bund profile would result in slope angles in the order of 52.5 degrees, which are not viewed by the council as credible cross-sectional profiles for the creation of long-term soil storage stockpiles or screening bunds.	in the detailed design in collaboration with other disciplines.
WC1-131	Landscape and Visual	9.29 Applicant's Response to the Examining Authority's First Written Questions [REP3-128]	19.44. The council notes the action point ISH2 Action Point 18 [EV8-010] for the Applicant to provide maximum parameter commitments such as footprint, height and angle of slopes for long-term soil stockpiles. The council will review and provide further comment on this detail following its submission at Deadline 4. The council would request the Applicant to include design parameters and commitments for soil stockpiles and earth bunds (further discussed and detailed in the council's comments for 7.4 Design Principles and	See comment above.

Reference	Theme	Issue	Comments	Applicant's Response
			Parameters (Rev 3) [REP3-084] , under comments for Work no.8.	
WC1-132	Socio-Economics, Tourism and Recreation	9.29 Applicant's Response to the Examining Authority's First Written Questions [REP3-128]	SE1.3 19.45. Whilst Wiltshire Council accept that the economic impact of the scheme across the whole county will only be adverse, the council is still of the opinion that the impact on local businesses within a minimum of 5km of the scheme and along the cable route, without a comprehensive compensation scheme will be significant, though mainly confined to periods of construction / decommissioning and for at least one year post the work being completed. The council notes that there have been a significant number of representations which support this opinion.	The Applicant notes this comment and refers to where the Applicant has provided its position on the assessment results in ES Volume 1, Chapter 16 Socio Economics, Tourism and Recreation [APP-068] in previous responses to Wiltshire Council: see WC-035 in the Applicant's Response to Deadline 3 Submissions [REP4-082]. Whilst the Applicant has stated why it does not consider there to be any significant effects to business sectors within 5 km Study Area (as there is less than a 1% reduction in employment or economic value to either the agriculture or tourism sectors). The Council have not yet stated what their significance criteria is, or how it has come to their judgement of what those significant effects would be, and why the Applicant's mitigation measures are considered to be insufficient. The Applicant has furthermore presented its reasoning for why it does

Reference	Theme	Issue	Comments	Applicant's Response
				not consider there is need for a business compensation scheme in response to question SE2.2 in the Applicant's Response to the Examining Authority's Second Written Questions [EXAM/9.54] .
WC1-133	Socio-Economics, Tourism and Recreation	9.29 Applicant's Response to the Examining Authority's First Written Questions [REP3-128]	19.46. The council also considers that further justification of the 20km limit is required. Due to its road network, most commuting in Wiltshire is East / West rather than North / South. Whilst it would include the population centres of Chippenham and Malmesbury, both these areas have low rates of unemployment. The council suspects that the development will attract staff from Swindon and Bristol, along to a lesser extent Melksham and Trowbridge.	A 20 km, or roughly 30-minute commuting time has been deemed appropriate as an approximate area within which workers on the Scheme may live or be accommodated within and reasonably commute to the Scheme for work. Using a 20 km Study Area rather than relying on the administrative boundary of Wiltshire has been used given the Scheme's location near the county's border, and its accessibility via road to population centres within the likely 30-minute commuting distance. It is therefore more reasonable to assume that workers may travel from across the north and west of Wiltshire and its neighbouring council areas (Bath and North East Somerset, Cotswold, Somerset (former Mendip area), South Gloucestershire, Stroud and Swindon) rather than just from Wiltshire alone.

Reference	Theme	Issue	Comments	Applicant's Response
				This approach is based on professional judgement in the absence of standardised industry guidance and based on precedent from previous schemes undertaken by the Applicant
WC1-134	Socio-Economics, Tourism and Recreation	9.29 Applicant's Response to the Examining Authority's First Written Questions [REP3-128]	19.47. The council considers that it would also be helpful if the Applicant could confirm whether any mapping has been done to show potential supply chain businesses that might benefit from this scheme within the 20km study area.	The Applicant has not undertaken a mapping or spatial investigation of potential supply chain businesses up to this stage, and considers that this would be best discussed in detail in coordination with Wiltshire Council and any additional stakeholders during the production and determination of the detailed Skills Supply Chain and Employment Plan pursuant to Requirement 18 of the Draft DCO [REP4-004]. In specific regard to equine businesses, the Applicant confirms this is included in the Equine Business Report [EN010168/EXAM/9.62] submitted at Deadline 5 and refers to in-text Figure 2: Postcode areas for Supply Chain Analysis and Annex A: Index and Map of Equine Businesses and Equestrian Facilities .

Reference	Theme	Issue	Comments	Applicant's Response
WC1-135	Transport and Access	9.29 Applicant's Response to the Examining Authority's First Written Questions [REP3-128]	TT1.3 19.48. The ExA commented that "The ExA considers that there is inadequate descriptive and illustrated detail of the highway improvement works (particularly the areas that require widening) that would take place in each of the HIAs". This certainly reflects the view of the council, and comments on the drawing showing proposed works along Alderton Road in Annex I to Environmental Statement Volume 3, Appendix 13-1 Transport Assessment (Rev 2) were made in the council response at Deadline 2 [REP2-048]. It is noted that the Applicant intends to provide more intended works detail at Deadline 4.	The proposed widening works on Alderton Road and Fosse Way are shown in further detail at Annex I of ES Volume 3 Appendix 13-1: Transport Assessment [REP4-037] in Drawings PL302 – PL304.
WC1-136	Transport and Access	9.29 Applicant's Response to the Examining Authority's First Written Questions [REP3-128]	TT1.5 19.49. The Applicant states "All new accesses created for construction along the CRC corridor would be closed post construction and the land / boundary reinstated to its pre-construction state	The Applicant makes note of this comment.

Reference	Theme	Issue	Comments	Applicant's Response
			unless otherwise agreed with the landowners or Local Authority. Any maintenance would be undertaken via existing field entrances. All existing accesses along the CRC would be reinstated to their pre-altered state / size unless agreed otherwise with the landowners or Local Authority. All existing accesses to the Solar PV sites would be retained in their altered state / size". This is as understood by the Council previously.	
WC1-137	Transport and Access	9.29 Applicant's Response to the Examining Authority's First Written Questions [REP3-128]	TT1.6 19.50. The Applicant states in part response to the question on the robustness of forecasting that "If the figures in the final CTMP are greater than those assessed when it comes to be implemented, further assessment would be required to demonstrate the traffic volumes remain not significant". This assumes the actual level of generated traffic is not significant and is a real concern during the construction phase if the level of HGV trafficking is	The Applicant has submitted revised trip generation calculations in the same format as the SLD calculations at Deadline 5. This document is titled ' Highways Technical Note in response to Appendix A of the SLD Deadline 4 submission ' [EN010168/EXAM/9.64] . These calculations have now been discussed with SLD's transport consultant.

Reference	Theme	Issue	Comments	Applicant's Response
			duly shown to be notably underestimated.	
WC1-138	Transport and Access	9.29 Applicant's Response to the Examining Authority's First Written Questions [REP3-128]	TT1.7 19.51. The Applicant response states that "in accordance with the Outline CTMP [REP1-112] and the Construction Worker Travel Plan, shifts will be organised to avoid construction worker movements between 08:00-09:00 and 17:00-18:00 and arrivals and departures will be spread over more than a single hour. Therefore, the increase in vehicle numbers is unlikely to result in material delays. The site is located within a predominantly rural area where baseline traffic flows on the surrounding highway network are relatively low, and roads generally operate well within capacity". This response doesn't seem to answer the ExA question about the assumed worker numbers employed at each site. The council has provided its own response to the assumed methodology, including the assumed distribution of light vehicle trips. It cannot be assumed	The Applicant took the peak number of construction workers (622) over the entire draft construction programme and distributed it proportionally across the solar PV sites. A check was then made comparing the peaks on each construction route against the distributed 622 figure, finding that these peaks were lower. Accordingly, the proportional distribution of 622 workers was assessed as it provided a more robust worst-case for assessment. The draft programme is subject to change and will be set out in the final CTMP. The Applicant therefore used these figures as AADTs in the assessment. This approach was used to provide a worst-case assessment against the methodology used for the ES assessment presented in ES Volume 1, Chapter 13: Transport and Access [REP4-014].

Reference	Theme	Issue	Comments	Applicant's Response
			that these vehicle trips would be solely confined to the prescribed construction routes.	Table 13-23 in ES Volume 1, Chapter 13 Transport and Access [REP4-014] provides a worst-case assumption in term of impact by placing all light vehicle trips onto the identified construction routes.
WC1-139	Transport and Access	9.29 Applicant's Response to the Examining Authority's First Written Questions [REP3-128]	TT1.8 19.52. It remains the council's view that a 50% uptake assumption is optimistic, despite it being accepted on other Solar Farm studies. The Applicant <i>states "The site is located within a rural area with limited public transport accessibility, meaning that travel to the construction compounds would otherwise be heavily reliant on private car use. To manage this, a dedicated shuttle bus service will be implemented, with pick-up locations established in nearby settlements" and "Construction worker travel patterns are typically highly regular, with fixed start and finish times and limited flexibility. A shuttle bus provides these workers with reduced fuel and travel costs and removes the need to navigate rural routes. This makes the workforce particularly suited to organised transport</i>	ES Volume 1, Chapter 16 Socio Economics, Tourism and Recreation [APP-068] states that on a peak day, 59.5% are estimated to relocate from across the UK to the Study Area, private rental accommodation, hotels and serviced accommodation. Based on 40.5% workers in the Study Area already working in the 'Construction of utility projects' employment subsector. Whilst the shuttle bus will be available for all workers it is expected that it will primarily serve the 59.5% as these will be workers staying known locations in larger groups and suitable pick up and drop off shuttle bus points can be easily arranged. Examples of percentage shuttle bus use for consented DCO solar farms include:

Reference	Theme	Issue	Comments	Applicant's Response
			<i>solutions, allowing shuttle services to operate efficiently and align closely with demand</i> ". It would not be atypical for employee start / finish times to be regular, but it seems to the council that the attractiveness of the shuttle bus service will be more governed by the distribution of the 'home' locations of workers and convenience of the 'pick-up' points. Also, how long the shuttle bus 'round trip' would take when compared with a direct car / van trip to the site from the home location. It is accepted that parking controls at the various Solar Park sites can be used as a 'stick' measure to discourage work trips being made by car, but effectiveness will depend on whether on-street parking at points along the rural lanes is possible and, if so, whether it can be prevented.	• Gate Burton – at post decision stage – 55% shuttle bus • Beacon Fen Energy Park – in examination – 55% • Tillbridge Solar Project – post decision stage – 47% • Stonestreet Green Solar – post decision stage – 75% • Longfield Solar Farm – post decision stage – 55% • Cleve Hill Solar Farm – Delivered – 100% Based on this, the assumption of 50% shuttle bus usage is justified, with potential for shuttle bus usage to be higher, and for it to also serve local workers. The shuttle bus will be managed through measures set out in the Construction Worker Travel Plan, which will form part of the Final CTMP. This will include details on pick-up and drop-off locations and limits placed on on-site contractor parking provision
WC1-140	Transport and Access	9.29 Applicant's Response to the	TT1.10	The Applicant makes note of this comment. The level of trip generation

Reference	Theme	Issue	Comments	Applicant's Response
		Examining Authority's First Written Questions [REP3-128]	19.53. Whilst there is no specific Highways Development Management comment, it is considered that the Applicant has not really answered the ExA question about the risk of local traffic rerouting to avoid conflict with HGVs using the narrow rural lanes earmarked for Lime Down Solar Park construction access. The simple fact is no diversion has been assumed, as the Applicant considers the Traffic Management and Monitoring System (TMMS) to be considered for implementation as part of the final detailed CTMP will effectively manage HGV conflicts and prevent operational delays for other existing traffic.	and the implementation of the Traffic Management and Monitoring System (TMMS) as part of the final detailed CTMP will effectively manage HGV conflicts and prevent operational delays for other existing traffic.
WC1-141	Transport and Access	9.29 Applicant's Response to the Examining Authority's First Written Questions [REP3-128]	TT1.12 19.54. This Applicant response explains why the fixed solar panel assumption used in the Transport Assessment (as opposed to the use of tracker panels) results in a worst-case HGV delivery trip estimate. The reasoning given states " <i>a fixed south-facing panel achieves lower</i>	The applicant makes note of this comment and refers to the Applicant's response to Examiners Second Questions TT2.1 set out in the Applicant's Response to the Examining Authority's Second Written Questions [EN010168/EXAM/9.54] .

Reference	Theme	Issue	Comments	Applicant's Response
			<i>energy generation to a tracker panel. This is because the tracker panel follows the sun for a greater proportion of the day. However, when considering panels in a fixed area of land, a greater installed capacity can be achieved through the use of fixed panels. This is due to efficient layouts of tracker panels requiring greater spacing. A fixed panel layout will therefore be denser than a tracker panel layout, require a greater number of panels, and accordingly, a greater number of vehicle movements to deliver those panels".</i> This is fine, but in referring back to the response to the SLD Written Representation [REP3-133], it would be helpful if the Applicant could confirm the fixed PV Module per acre density assumed, what density of tracker panels would be needed to achieve the same power output and the HGV load capacity per vehicle if used. It would also be useful to know what is proposed in terms of the PV Module type, or types, and their proportions.	The Applicant confirms that flexibility is sought to utilise Single Axis Tracker (SAT) and/or Fixed Panel mounting layouts and retains the ability to deploy a blend of both technologies across the Scheme.

Reference	Theme	Issue	Comments	Applicant's Response
WC1-142	Transport and Access	9.29 Applicant's Response to the Examining Authority's First Written Questions [REP3-128]	TT1.18 19.55. It is noted that this was covered in depth at the ISH3 Hearing, and thus the council offers no further comments at this stage. It is understood that further NMU surveys are planned by the Applicant.	The Applicant makes note of this comment. The Applicant intends to submit further information at Deadline 6.
WC1-143	Transport and Access	9.29 Applicant's Response to the Examining Authority's First Written Questions [REP3-128]	TT1.19 19.56. The council will provide the data in response to this question in a separate submission, also to be submitted at Deadline 4.	The Applicant makes note of this comment.
WC1-144	Transport and Access	9.29 Applicant's Response to the Examining Authority's First Written Questions [REP3-128]	TT1.20 19.57. The Applicant response to the ExA question on assessed NMU safety states that "Road Safety Audits (RSA) are undertaken in accordance with DMRB GG119, which states that they apply "Where there are physical changes to the highway impacting on road user behaviour or resulting in a	In accordance with Tables 3.1, 3.2 and 3.3 in ISEP Transport and Access guidelines, the change in traffic flow and heavy vehicle composition from trips generated by the Scheme do not result in a step-change in the magnitude of fear and intimidation. For example, and in accordance with Table 3.2 , the Level of Fear and Intimidation on Bradfield Cottages does

Reference	Theme	Issue	Comments	Applicant's Response
			change to the outcome of a collision on the trunk road and motorway network". The usage of existing roads by construction traffic would therefore not typically fall within the remit of RSA, as it does not constitute a 'physical change to the highway'". This is true and accepted, although given the level of proposed HGV trafficking along the narrow rural lanes, it would have been expected that some sort of Risk Assessment would have been carried out. The Applicant further states that "The suitability of the use of these routes is therefore considered in relation to personal injury collision records and professional judgement". The only issue with over-reliance on historical PIC records is that the development and regular HGV trafficking during LDSP construction will create a 'step change' in the size / weight of the vehicles using these lanes, which would not have been present as a potential accident causation factor in the past record.	not result in a step change for to the degree of hazard score when using the criteria presented in Table 3.1. Existing: • 85veh/hour - 0 hazard score • 58 HGV's - 0 hazard score • Speed 30-40mph – 20 hazard score • Level of fear and intimidation is small (0-20) Existing plus development • 95 veh/hour so will remain below 600 movements during the construction period, hazard score of 0 • 114 HGV's so will remain below 1,000 during the construction period. Hazard score of 0 • No change in speed hazard score 20 • Level of fear and intimidation is small (0-20)

Reference	Theme	Issue	Comments	Applicant's Response
				Using Table 3.3 the change is Negligible as there is no step change in level.
WC1-145	Landscape and Visual	9.30 Applicant's Response to Comments Received at Deadline 2 [REP3-129]	Comment WCD1-073 20.1. The council raised concerns relating to the fact that it was not clear as to which fields / areas development was proposed on the viewpoint panoramas. There has been no adequate response to this in the Applicant's response to the query, apart from to state that the Council did not originally request the panel fields, substations and BESS locations, resulting in their omission.	The Applicant has provided annotated Site photography and directs WC to Figure 8-14 Baseline Photography and Photomontages Parts 1 – 3 [REP2-010 to REP2-012] .
WC1-146	Landscape and Visual	9.30 Applicant's Response to Comments Received at Deadline 2 [REP3-129]	20.2. The council would respond that providing this information forms an integral part of the ES process and therefore would not have expected the Applicant to fail to submit such important information for either the council or other parties to make interpreting the information and making reasoned judgements difficult.	Please see Applicants response to 20.1 above.

Reference	Theme	Issue	Comments	Applicant's Response
WC1-147	Transport and Access	9.30 Applicant's Response to Comments Received at Deadline 2 [REP3-129]	Comment WCD1-078 20.3. The Applicant states "It is accepted that the drawings (Transport Assessment -Annex C) are regarded as preliminary and that detailed design approval will be covered by Wiltshire Council Protective Provisions included in Schedule 15 to the Development Consent Order". This is noted and accepted.	The Applicant makes note of this comment.
WC1-148	Transport and Access	9.30 Applicant's Response to Comments Received at Deadline 2 [REP3-129]	Comment WCD1-080 20.4. The Applicant states "It is accepted that the drawings (Transport Assessment - Annex D) are regarded as preliminary and that detailed design approval will be covered by Wiltshire Council Protective Provisions included in Schedule 15 to the Development Consent Order". This is noted and accepted.	The Applicant makes note of this comment.
WC1-149	Transport and Access	9.30 Applicant's Response to Comments Received at	Comments WCD1-082 to WCD1-084 20.5. The Applicant states "The quantities of PV Modules and Module	The Applicant has submitted revised trip generation calculations in the same format as the SLD calculations at Deadline 5. This

Reference	Theme	Issue	Comments	Applicant's Response
		Deadline 2 [REP3-129]	Mounting Structures for each of the Lime Down sites (A-E) is based on the areas to be occupied by panels and initial layouts and indicative designs prepared by the Applicant. These densities are comparable to other solar schemes." However, it is still by no means clear how the proposed density compares to other solar farms sites, as the Applicant has not commented on the comparative HGV / ha ratios in Table 2 of the SLD Written Representation (Appendix D - Transport Report). See council officer's comments on the Applicant's response to SLD Written Representation [REP3-133] on this point below.	document is titled ' Highways Technical Note in response to Appendix A of the SLD Deadline 4 submission ' [EN010168/EXAM/9.64] . This sets out module densities and how they compare to other solar farm sites and the assumed densities set out in NPS EN-3.
WC1-150	Other Environmental Matters – Minerals and Waste	9.30 Applicant's Response to Comments Received at Deadline 2 [REP3-129]	Comment WCD1-085 20.6. The Applicant states "It has been assumed that any excavated material will remain on site. In the event of any spoil being taken off site, where possible this will be undertaken by the same tippers used for incoming supply of aggregate". This is a big concern given	It has been assumed that any excavated material will remain on site. In the event of any spoil being taken off site, where possible this will be undertaken by the same tippers used for incoming supply of aggregate. While it is anticipated that most of the spoil from the construction of access tracks etc. will remain on site, the calculations at Annex E of ES Volume 3, Appendix 13-1: Transport

Reference	Theme	Issue	Comments	Applicant's Response
			the circa 139,000 cubic metres of unsuitable material identified in the Outline Waste Management Plan. Furthermore, assuming the supplier delivering aggregate will also be happy to employ the same tippers to remove all waste spoil offsite to tip is also not a worst-case scenario, but rather the ideal.	Assessment [REP4-037] allow for general construction activities, including the removal of spoil, other construction waste and the installation and removal of construction compounds. The waste assessment outlined in ES Volume 1, Chapter 20 Other Environmental Matters [APP-072] and the Outline Site Waste Management Plan [REP1-102] takes a worse case for the purpose of waste assessment only that the volume of excavated soil that is likely to be deemed unsuitable for refill and compaction is circa 139,666 cubic metres. As stated above it is anticipated that most spoil would reused on onsite.
WC1-151	Construction and Decommissioning	9.30 Applicant's Response to Comments Received at Deadline 2 [REP3-129]	Comment WCD1-086 20.7. The Applicant still does not clarify whether the base depths used should be 0.5m or 0.8m or, if both, whether the differing construction depths are	The Applicant has submitted revised trip generation calculations in the same format as the SLD calculations at Deadline 5. This document is titled 'Highways Technical Note in response to Appendix A of the SLD Deadline 4 submission' [EN010168/EXAM/9.64].

Reference	Theme	Issue	Comments	Applicant's Response
			included in the calculations for this element.	This includes information on the assumed based depths. These calculations have now been discussed with SLD's transport consultant.
WC1-152	Construction and Decommissioning	9.30 Applicant's Response to Comments Received at Deadline 2 [REP3-129]	Comment WCD1-087 20.8. The council notes the comments and the 0.3m and 0.5m (BESS) typical access track depths used are accepted.	The Applicant makes note of this comment.
WC1-153	Transport and Access	9.30 Applicant's Response to Comments Received at Deadline 2 [REP3-129]	Comments WCD1-089 to WCD1-093 20.9. The Applicant states that "The Applicant accepts that General Arrangement and a full pack of detailed drawings based on a topographical survey base would be submitted to Wiltshire Council for full technical approval as part of the DCO protective provisions". This is acceptable although, for the purposes of the Transport	The Applicant has submitted locations along the construction routes to Lime Down A-C and Lime Down D (via Bradfield cottage) showing two HGVs passing in Annex K of ES Volume 3 Appendix 13-1: Transport Assessment [REP4-037]. As requested, the drawings now include road width geometry at the passing places, which demonstrate at least a 5.5

Reference	Theme	Issue	Comments	Applicant's Response
			Assessment, it would be helpful to see some more information shown on the drawing in Annex I, such as dimensions showing the proposed carriageway widths through the passing area sections and the lengths of the respective widening treatments.	metre road width to allow two HGVs to pass, as specified by Wiltshire Council. The proposed widening works on Alderton Road and Fosse Way are shown in further detail at Annex I of ES Volume 3 Appendix 13-1: Transport Assessment [REP4-037] in Drawings PL302 – PL304 .
WC1-154	Transport and Access	9.30 Applicant's Response to Comments Received at Deadline 2 [REP3-129]	Comment WCD1-094 20.10. The Applicant advises that "there are frequent opportunities for two HGVs to pass on the section of road between the junction with The Street and the first proposed area of works to the north of the village. Drawing SP52 in Annex I of ES Volume 3, Appendix 13-1: Transport Assessment (Rev 2) [REP1-057 and REP1-059] will be updated at Deadline 3 to demonstrate inter-visibility between HGVs turning left into and right out of Alderton Road". Comment on this has been provided in the review of the latest Revision 3 to the Transport Assessment [REP3-066] above.	Drawing SP52-A included updates as requested by WC and is included in Annex K of ES Volume 3 Appendix 13-1: Transport Assessment [REP4-037] .

Reference	Theme	Issue	Comments	Applicant's Response
WC1-155	Transport and Access	9.30 Applicant's Response to Comments Received at Deadline 2 [REP3-129]	Comments WCD1-097 to WCD1-099 20.11. The Applicant states in respect of the road between Dyson RBT and Bradfield Cottages that "Drawings SP34 and SP36 have now been superseded by Drawings SP34-B and SP36-B provided in Annex J of ES Volume 3, Appendix 13-1: Transport Assessment (Rev 2) [REP1-057 and REP1-059] at Deadline 1. Drawings SP34-B and SP36-B are based on a topographical survey base and demonstrate an HGV and car can pass for the vast majority of the route. The longest length of restricted passage between a car and HGV is just under 30 metres in length, which is reasonable" and "SP43-SP46 in Annex I of ES Volume 3, Appendix 13-1: Transport Assessment (Rev 2) [REP1-057 and REP1-059] have been updated at Deadline 3 to demonstrate inter-visibility between HGVs and cars on the Fosse Way based on topographical survey base and to include indicative widening improvements within the Order Limits. This demonstrates an HGV and	The Applicant makes note of this comment.

Reference	Theme	Issue	Comments	Applicant's Response
			car can pass for most of the route. The longest length of restricted passage between a car and HGV is just under 75 metres in length, which is considered reasonable".	
WC1-156	Transport and Access	9.30 Applicant's Response to Comments Received at Deadline 2 [REP3-129]	20.12. It is encouraging to learn that the Applicant is now using topographical survey coverage of the narrow rural lanes to inform swept path analyses, as opposed to former reliance on OS-Landline mapping. Additional carriageway widening along the Fosse Way is welcomed, but the improvements where proposed will need to cater for the passage of two 16.5m articulated HGVs.	The proposed improvements on the Fosse Way all cater for the passage of two 16.5m articulated HGVs, providing a width of a least 6.0 metres in each location. This is shown in Annex K and Annex I of ES Volume 3 Appendix 13-1: Transport Assessment [REP4-037] .
WC1-157	Transport and Access	9.30 Applicant's Response to Comments Received at Deadline 2 [REP3-129]	Comment WCD1-101 20.13. The Applicant states "The drawings have been based on OS mapping as this section of road presents a number of clear opportunities for HGVs to pass".	Further topographical data is being obtained, and the requested updates to Drawings will be provided at Deadline 6.

Reference	Theme	Issue	Comments	Applicant's Response
			However, in the council's response at Deadline 2 [REP2-048] it was <i>noted</i> "It would be helpful to see some dimensions added to the plan to show the 'actual' carriageway widths through some of the passing sections. The 'base' used for tracking should also be a topographical survey due to the inherent inaccuracies with OS Landline data, noting that even small-width errors could be significant". Concerns about widths here were also raised by both SLD and the ExA at the ISH3 Hearing, so it is necessary to see a topographical survey of this road length with actual carriageway widths indicated at intervals (say at 10m chainage points).	
WC1-158	Transport and Access	9.30 Applicant's Response to Comments Received at Deadline 2 [REP3-129]	Comments WCD1-102 to WCD1-104 20.14. The Applicant maintains that no mitigation works to improve HGV passage under the DCO are needed through the section between The Street junction and the access to the Flying Monk Café / Taproom. As far as the section between the Flying Monk Café	The Applicant makes note of this comment see response to 8.8 above.

Reference	Theme	Issue	Comments	Applicant's Response
			access to the proposed Lime Down D access points (Refs 7, 8 and 20) is concerned, the council's expressed view at Deadline 2 was <i>"it would be preferable to see some mitigation works considered and included to improve passing opportunity provision"</i> . In short, nothing in the way of HGV passage improvements is still proposed on any part of the route between The Street and Bradfield Cottages. As noted at the ISH3 Hearing, it remains a council concern that no HIA works are included along this very sensitive part of the access route to Lime Down area D.	
WC1-159	Transport and Access	9.30 Applicant's Response to Comments Received at Deadline 2 [REP3-129]	Comment WCD1-105 20.15. The Applicant states that "For incoming vehicles arriving earlier than their allocated 'slot' time, or possibly later due to travel delays suggested holding locations have been included in the updated Outline CTMP". However, the response goes on to say that "It is the Applicant's position that holding areas for incoming deliveries will not be	Holding area have been identified should they be insisted upon. However, it is still the Applicants position that they will not be required.

Reference	Theme	Issue	Comments	Applicant's Response
			required". These statements do seem to rather contradict each other.	
WC1-160	Transport and Access	9.30 Applicant's Response to Comments Received at Deadline 2 [REP3-129]	Comment WCD1-106 20.16. The Applicant refers to an update of this drawing in Revision 3 to the Transport Assessment. The council's Highways Development Management Officer has commented on this in reviewing the changes to the Transport Assessment [REP3-066] above.	Drawing SP52-A included updates as requested by WC and is included in Annex K of ES Volume 3 Appendix 13-1: Transport Assessment [REP4-037] .
WC1-161	Transport and Access	9.30 Applicant's Response to Comments Received at Deadline 2 [REP3-129]	Comments WCD1-107 and WCD1-108 20.17. The Applicant refers to updates to these drawings in Revision 3 to the Transport Assessment. The response does not comment on the need for additional highway works to improve passing provision for two HGVs, despite the council's expressed view that "mitigation will be needed in the form of additional passing bay works which aren't currently proposed" for the Fosse Way (South) length possible to review in full at Deadline 2. The Applicant states "While intervisibility between passing places for two HGV's exceeds 200	See the Applicant's response to 8.9 above.

Reference	Theme	Issue	Comments	Applicant's Response
			metres in places, the Fosse Way is a straight and relatively flat road ensuring good visibility between passing places". However, as discussed at length at the ISH3 Hearing, it is the council's view that there is a maximum desirable spacing distance beyond which driver perception of the passage conflict and simultaneously taking action to use a passing point which may be available becomes more difficult, even on straight lengths of narrow road.	
WC1-162	Landscape and Visual	9.30 Applicant's Response to Comments Received at Deadline 2 [REP3-129]	Comment WCD1-131 20.18. The council had raised the concern that the current scheme does not allow for any review of the performance of the proposed landscape mitigation and whether it is achieving the required benefits, or provision for amendment or adaptative management should this be found to be required.	The Outline LEMP [REP3-100] sets out the proposed ongoing General Management Prescriptions for all vegetation within the order Limits. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, which would be required to be substantially in accordance with the Outline LEMP [REP3-100] , is secured through Requirement 7 in Schedule 2 of the Draft DCO [REP4-004] .

Reference	Theme	Issue	Comments	Applicant's Response
WC1-163	Landscape and Visual Cultural Heritage	9.30 Applicant's Response to Comments Received at Deadline 2 [REP3-129]	20.19. The Applicant's response at Deadline 3 is that Table 6 of the Outline CEMP [REP2-019] has been updated to ensure monitoring for heritage purposes is undertaken in line with the Outline LEMP [APP-283] . The updating referred to in the Outline CEMP [REP2-019] notes that <i>"Monitoring of the effectiveness of proposed planting will be undertaken in line with Annex A of the Outline Landscape and Ecological Management Plan (LEMP) [EN010168/APP/7.18] and replacement planting will be undertaken in line with Sections 1.3.15 to 1.3.18 of the LEMP."</i> However, the details set out in the Outline LEMP [APP-283] at paragraphs 1.3.15 – 1.3.18 simply include the usual provisions for replacing dead and dying specimens and carrying out essential maintenance to ensure the landscaping remains in situ; these do not include any proposals for monitoring or assessing the efficacy of the landscaping in providing the mitigation required or for making amendments if required.	The Outline Construction Environmental Management Plan [REP4-049] has been updated to clarify that monitoring of landscape mitigation planting will be undertaken in accordance with the Outline Landscape and Ecological Management Plan (LEMP) [REP3-100] . The Outline LEMP [REP3-100] secures the establishment, maintenance and replacement of planting to ensure that the approved landscape mitigation is successfully implemented and maintained over time. The Applicant considers that the mitigation and monitoring measures secured through the Outline CEMP [REP4-049] and Outline LEMP [REP3-100] are appropriate and proportionate to the level of effect identified in the Environmental Statement and are sufficient to safeguard heritage assets. As such the Applicant does not consider a heritage-assessment during the operation phase is required to assess the efficacy of the proposed landscape mitigation.

Reference	Theme	Issue	Comments	Applicant's Response
			20.20. The council's concern therefore has not been addressed.	The Outline LEMP [REP3-100] sets out the proposed ongoing General Management Prescriptions for all vegetation within the order Limits. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, which would be required to be substantially in accordance with the Outline LEMP [REP3-100] , is secured through Requirement 7 in Schedule 2 of the Draft DCO [REP4-004] .
WC1-164	Cultural Heritage	9.30 Applicant's Response to Comments Received at Deadline 2 [REP3-129]	Comment WCD1-132 20.21. The council had raised the concern that guidance to the contractor to undertake works as 'far away from heritage assets as reasonably practicable' is advisory only and cannot be considered to secure any additional mitigation from potential harm. 20.22. The Applicant's response at Deadline 3 is a reminder that construction activities are temporary and	Mitigation measures to avoid or reduce potential effects on heritage assets are set out in Section 12.9 of ES Volume 1, Chapter 12: Cultural Heritage [APP-064] and are secured through the Outline CEMP [REP4-049] and the Outline LEMP [REP3-100] and are considered appropriate and proportionate to the level of effect identified in the Environmental Statement.

Reference	Theme	Issue	Comments	Applicant's Response
			reversible in nature and reiterates that the update will minimise any temporary visual effects where practicable. However, the council's concern extends to temporary impacts (see comments set out in detail in respect of Grittleton House in paragraphs 5.81 – 5.85 of the Wiltshire Council Comments on Submissions Received at Deadline 2 [REP3-141] and it remains the case that a purely advisory comment cannot be considered to secure any specific mitigation. 20.23. The council's concern therefore has not been addressed.	While the Applicant acknowledges that the additional wording within the CEMP could be viewed as advisory, it is considered that the proposed safeguard provides and appropriate commitment to minimise intervisibility between the asset and works associated with the installation of the cable route corridor, particularly given the temporary, localised and reversible nature of the proposed construction activities.
WC1-165	Transport and Access Cultural Heritage	9.30 Applicant's Response to Comments Received at Deadline 2 [REP3-129]	Comment WCD1-134 20.24. The council raised the concern at Deadline 2 [REP2-048] and Deadline 3 [REP3-141] that the update made to Table 6 of the Outline CEMP [REP2-019] and Outline CTMP [REP1-112] which provided for the design of highway improvement works to the track to the southwest of Rodbourne Road	As stated in Draft DCO [REP4-004] the detailed design of the scheme must be submitted and approved by Wiltshire Council prior to the commencement of construction (see Requirement 5). As stated in Requirement 15 "No part of the authorised development may commence until a construction traffic management plan for that part has been

Reference	Theme	Issue	Comments	Applicant's Response
			(Works Number 8b) needed to facilitate permanent access to Lime Down Site E (Work Nos. 1 to 6 and 9 to 10), to be undertaken in consultation with the Wiltshire Council Conservation Officer cannot in itself be considered to safeguard the conservation area. It is currently unclear what the highways requirement will be or whether there will be any scope for amendment or mitigating the impact of the requirements and, whilst the provision provides the opportunity to influence the works if this is possible, it does not ensure that there will be any solution which can prevent the occurrence of some harm. 20.25. The council's concern therefore has not been addressed.	submitted to and approved by the relevant planning authority." As stated in the Outline CTMP [REP4-057] the approval of highway improvement works to the track to the southwest of Rodbourne Road (Works Number 8b) by Wiltshire Council must be done so in consultation with the Wiltshire Conservation Officer. The Applicant therefore considers the appropriate mechanisms are in place whereby the detailed design for any part of the Scheme will be submitted to and approved by Wiltshire Council prior to its implementation. A safeguard has been put in place for Works Number 8b, to ensure the sign off from Wiltshire Council Highway Team is done so in consultation with the Conservation Officer.
WC1-166	Transport and Access	9.30 Applicant's Response to Comments Received at	Comment WCD1-139 20.26. This comment repeats the arguments set out against Comment WCD1-131 (as above). The council's	This matter has been addressed in the Applicant's response to Comment WCD1-131 above.

Reference	Theme	Issue	Comments	Applicant's Response
		Deadline 2 [REP3-129]	concern therefore has not been addressed.	
WC1-167	Transport and Access	9.30 Applicant's Response to Comments Received at Deadline 2 [REP3-129]	Comment WCD1-140 20.27. This comment repeats the arguments set out against Comment WCD1-134 (as above). The council's concern therefore has not been addressed.	This matter has been addressed in the Applicant's response to Comment WCD1-134 above.
WC1-168	Landscape and Visual	9.30 Applicant's Response to Comments Received at Deadline 2 [REP3-129]	Comment WCD1-148 20.28. The council raised concern that there has been very little information given as to the landscape and visual effects of decommissioning, and potential further adverse landscape and visual effects. The council is also concerned that some of the embedded mitigation may not be appropriate to reinstate the rural agricultural landscape to its baseline state.	As set out in the Applicant's Response to the Examining Authority's First Written Questions [REP3-128] at LV1.3, hedgerow management at decommissioning will be secured within the Outline Decommissioning Strategy [REP3-096] as detailed in the Outline LEMP [REP3-100] . Following successful removal of panels and associated infrastructure, all hedgerows within the Order Limits will be assessed to consider best ecological and land management practices applicable at the time of decommissioning. Consideration should

Reference	Theme	Issue	Comments	Applicant's Response
				be given to hedgerow heights, widths, overall plant health, species diversity, landscape character, visual amenity, as well as use by protected or notable wildlife species etc. If appropriate at the time, measures to reduce the height of hedgerows to their current heights would take place during the two-year decommissioning phase and would be programmed to follow the removal of infrastructure to ensure that landscape and visual effects are as assessed in ES Volume 1, Chapter 8 Landscape and Visual [REP3-025]. Any cutting to reduce heights of hedgerows would take place outside of the key nesting bird season in line with best practice.
WC1-169	Landscape and Visual	9.30 Applicant's Response to Comments Received at Deadline 2 [REP3-129]	20.29. The Applicant's response that: although an adverse effect will be experienced during decommissioning this will cease at the end of decommissioning, which will be short term, although the length of this has not been given, but could be several years.	Decommissioning is expected to take between 12 and 24 months and would most likely be undertaken sequentially. Further details regarding the sequence and programme of decommissioning will be provided in the detailed

Reference	Theme	Issue	Comments	Applicant's Response
			Likewise, apart from stating that there would be an overall benefit to the area with mitigation retained, and that this would be a long-term benefit, there has been no attempt to show how this will not affect the current baseline state and that it will not affect the baseline character of the landscape.	Decommissioning Strategy, including timescales and transportation methods which would be agreed in advance with the relevant LPA, as secured through a Requirement in the DCO. Hedgerow management post decommissioning will be secured within the Outline Decommissioning Strategy [REP3-096] as detailed in the Outline LEMP[REP3-100]. Following successful removal of panels and associated infrastructure, all hedgerows within the Order Limits will be assessed to consider best ecological and land management practices applicable at the time of decommissioning. Consideration should be given to hedgerow heights, widths, overall plant health, species diversity, landscape character, visual amenity, as well as use by protected or notable wildlife species etc. If appropriate at the time, measures to reduce the height of hedgerows to

Reference	Theme	Issue	Comments	Applicant's Response
				their current would take place during the two-year decommissioning phase and would be programmed to follow the removal of infrastructure to ensure that landscape and visual effects are as assessed in ES Volume 1, Chapter 8 Landscape and Visual [REP3-025]. Any cutting to reduce heights of hedgerows would take place outside of the key nesting bird season in line with best practice. These measures would ensure that decommissioning activities will respect the baseline situation at the time of decommissioning rather than the baseline character of the landscape as it is now. This will allow decommissioning activities to be informed by management practices applicable at the time of decommissioning.
WC1-170	Landscape and Visual	9.30 Applicant's Response to Comments Received at	Comment WCD1-175 20.30. In reference to the Technical Note on Landscape Fabric and Landscape Character [REP1-121], the	The Applicant notes this comment.

Reference	Theme	Issue	Comments	Applicant's Response
		Deadline 2 [REP3-129]	Council maintains its current position that Wiltshire Council's Relevant Representation [RR-4934] , pages 20-21, paras 8.12 to 8.15 & pages 23-24, paras 8.27 to 8.31 remain unresolved.	
WC1-171	Landscape and Visual	9.30 Applicant's Response to Comments Received at Deadline 2 [REP3-129]	8.12. The issue of concern relates to the limited examples included in the definition of 'Landscape Fabric' within this assessment's 'LVIA Glossary' which does not include any representative 'built elements' or 'perceptual or aesthetic' qualities. It only includes the more natural elements such as landform, woodland, hedges, tree cover and vegetation.	ES Volume 1, Chapter 8 Landscape and Visual [REP3-025] has been undertaken with consideration of the appropriate and relevant guidance and robustly assesses both the landscape and visual effects of the Scheme independently to ensure both the impacts and effects on the fabric and character of the landscape are taken into account as well as views and visibility. Landscape Fabric of the Site is considered as a landscape receptor which is assessed independently to impacts on Landscape Character. The definition of Landscape Fabric is included on Page 48 of the Glossary of the agreed LVIA Methodology and at paragraph 8.7.16 of ES Volume 1,

Reference	Theme	Issue	Comments	Applicant's Response
				Chapter 8 Landscape and Visual [REP3-025] as: <i>“Landscape fabric is the individual tangible elements or features such as landform, woodland, hedges, tree cover, vegetation that make up a landscape or site. These can usually be described and quantified.”</i> These are the natural elements within the Site, for example the lengths of hedgerow or areas of woodland and grassland within each individual site – essentially the ‘green’ elements. The assessment of Landscape Character includes consideration of changes arising as a result of loss (or addition) of landscape components including changes to land management, introduction of new development and associated infrastructure and the loss to aspects such as tranquillity, and any perceptual, social environmental and

Reference	Theme	Issue	Comments	Applicant's Response
				historical considerations which would affect landscape character. The LVIA Methodology and therefore the above definitions have been agreed with both WC and the CNLB as set out within their corresponding Statements of Common Ground: Statement of Common Ground with Wiltshire Council [REP4-061] and Statement of Common Ground with Cotswolds National Landscape Board [REP2-029].
WC1-172	Landscape and Visual	9.30 Applicant's Response to Comments Received at Deadline 2 [REP3-129]	8.13. The definition of the term Landscape fabric needs to encompass all the physical and spatial components that combine and interact with each other. <u>These include natural, cultural and historic features, land-use and current management practices, built elements such as infrastructure and roads, settlement pattern, including perceptual and aesthetic aspects such as relative tranquillity and sense of openness / enclosure and ruralness</u> , all of which collectively define the baseline landscape fabric and combine and interact to form the characteristics of the	The Applicant notes that the above approach differs from the methodology agreed with WC through the pre submission consultation process. However, the Applicant wishes to express that the ES Volume 1, Chapter 8 Landscape and Visual [REP3-025] has undertaken a robust assessment on Landscape Character which includes consideration of all of the components/elements etc set out by WC above. The baseline for undertaking the assessment of effects on Landscape

Reference	Theme	Issue	Comments	Applicant's Response
			site and the receiving landscape context. <u>At present, the limited nature of landscape fabric components that the Applicant has considered within their assessment (both existing and introduced), is contributing to assessment scores which are not considered to give a true reflection of change to the baseline landscape fabric components</u> , which in turn, collectively comprise to give overall baseline landscape character.	Character was established by undertaking a detailed desk study, fieldwork, and analysis of findings to create a detailed understanding of the existing landscape and visual context of both the Solar PV Sites and Cable Route and the surrounding landscape within the proposed Study Area. The established baseline provides an understanding of the components of the landscape and visual resource that may be affected by the Scheme. Further details are set out within ES Volume 3 Appendix 8-1 Landscape and Visual Impact Assessment Methodology [REP1A-006] .
WC1-173	Landscape and Visual	9.30 Applicant's Response to Comments Received at Deadline 2 [REP3-129]	8.14. The various introduced new built elements / components such as substations, internal access tracks, solar PV arrays, alongside changes to current land use and management, alterations to the rural road network, new planting and changes to vegetation management are <u>all components that together influence the baseline landscape fabric, including its perceptual and aesthetic qualities</u> .	The Applicant notes this comment.

Reference	Theme	Issue	Comments	Applicant's Response
WC1-174	Landscape and Visual	9.30 Applicant's Response to Comments Received at Deadline 2 [REP3-129]	8.15. The council believes this contributes to the obvious shortcomings of the assessment of 'Landscape Fabric' included within the LVIA (this is discussed further under Landscape Fabric).	The Applicant notes this comment but respectfully disagrees with WC on this matter.
WC1-175	Landscape and Visual	9.30 Applicant's Response to Comments Received at Deadline 2 [REP3-129]	Comment WCD1-176 20.31. The council maintains its position that the assessment of landscape fabric / elements / components must contain the built form, land use and the road network through the receiving landscape.	The Applicant notes that the above approach departs from the methodology agreed with WC through the pre submission consultation process. However, the Applicant wishes to express that ES Volume 1, Chapter 8 Landscape and Visual [REP3-025] has undertaken a robust assessment on Landscape Character which includes consideration of all of the components/elements etc set out by WC above.
WC1-176	Landscape and Visual	9.30 Applicant's Response to Comments Received at	Comment WCD1-177 20.32. The council considers the assessment of landscape fabric components cannot be limited to natural	The Applicant notes that the above approach departs from the methodology agreed with WC through the pre submission consultation process. However, the Applicant wishes to express that ES Volume 1, Chapter 8

Reference	Theme	Issue	Comments	Applicant's Response
		Deadline 2 [REP3-129]	landscape components only and should not be as it must consider all those elements which combine to influence the Landscape Character as a whole, not those only capable of potentially resulting in positive effects within the DCO site areas.	Landscape and Visual [REP3-025] has undertaken a robust assessment on Landscape Character which includes consideration of all of the components/elements etc set out by WC above.
WC1-177	Landscape and Visual	9.30 Applicant's Response to Comments Received at Deadline 2 [REP3-129]	20.33. The Applicant states: The definition of Landscape Fabric was included in the LVIA Scoping and PEIR reports and the LVIA Methodology in ES Volume 3, Appendix 8-1 Landscape and Visual Impact Assessment Methodology [APP187] at section 1.6 on Landscape Receptors is clear about the approach of the assessment on Landscape Fabric as a separate receptor. Please see response below regarding the physical changes to Landscape Fabric as a result of the Scheme (WCD1-178).	The Applicant notes this comment.
WC1-178	Landscape and Visual	9.30 Applicant's Response to Comments Received at Deadline 2 [REP3-129]	20.34. The council raises concerns that the Applicant is not treating the landscape fabric elements (where they have actually been identified) separately, as should be the case, but is	The Applicant notes that the separate elements of Landscape Fabric (as defined in ES Volume 1, Chapter 8 Landscape and Visual [REP3-025]) such as trees and hedgerows have been quantified separately.

Reference	Theme	Issue	Comments	Applicant's Response
			grouping them together as a single receptor, which is clearly not the case.	Following ISH2, and at the request of the Examining Authority, the Applicant has provided updated Landscape Fabric Calculations to account for the losses associated with the proposed hardstanding. Please see Applicant's Response to the Examining Authority's First Written Questions [REP3-128] for further detail.
WC1-179	Cumulative and In-Combination Effects	9.30 Applicant's Response to Comments Received at Deadline 2 [REP3-129]	Comment WCD1-179 20.35. The Technical Note on Intra Project Cumulative Visual Effects [REP1-122] only refers to visual issues and not landscape character effects, previously raised as a concern of the council. The Technical Note does not address the fundamental issues relating to the establishment of either cumulative visual or landscape effects. Cumulative effects are exactly that, an accumulation of effects from two or more sites or, in this case, project areas. They are assessed at a high level but should be assessed separately from the individual components of the view or the	As set out in the Applicant's previous response at RS-007 in [REP2-039] "<i>the combined or Intra project cumulative effects were assessed in the LVIA and a Technical Note on Intra Project Cumulative Visual Effects [REP1-122] was submitted at Deadline 1 to explain the assessment undertaken in the LVIA and to summarise the significant effects. The combined or intra project effects are when more than one Site is visible from any identified Receptor.</i>" The assessment relates to the Lime Down Scheme only and not Cumulative Development Sites. The Intra Project Cumulative Visual Effects being the

Reference	Theme	Issue	Comments	Applicant's Response
			landscape. They cannot be determined by simply averaging the impacts of individual components. Paragraphs 2.2.4 and 2.2.5 of the Technical Note bring in 'inter cumulative' sites, the Council does not understand where this has arisen from and why it is relevant to Intra project cumulative effects.	visual effects of the Lime Down Site A- E (Scheme effects). Paragraphs 2.2.4 and 2.2.5 of the Technical Note explains how the Intra Visual (cumulative Scheme visual effects) and the Inter (cumulative development visual effects) were assessed in the LVIA. The Intra project <u>Visual</u> effects, i.e.: the combined effects of the Scheme (Sites A-E) have been fully assessed in the LVIA and within the assessment sheets in ES Volume 3 Appendix 8-3-2-1 Visual Assessment Sheets (Non Significant) [APP-190]; and ES Volume 3, Appendix 8-3-2-2 Landscape and Visual Assessment Sheets (Significant) [APP-191]. As noted at paragraph 2.2.5 of the Technical Note on Intra Project Cumulative Visual Effects [REP1-122] there are no visual inter cumulative adverse effects were recorded on any of the assessed receptors.i.e., there was no identified inter visibility between any

Reference	Theme	Issue	Comments	Applicant's Response
				of the 5 Lime Down Sites and the Included Cumulative Developments. The Intra project <u>Landscape</u> effects, i.e.: the combined landscape effects of the Scheme (Sites A-E) have been fully assessed in the LVIA and in ES Volume 3, Appendix 8-3-2-2 Landscape and Visual Assessment Sheets (Significant) [APP-191] (refer to Scheme Effects in Section2) The Cumulative Landscape Effects of the Scheme (inter project cumulative Landscape effects) have been fully assessed in the LVIA and in ES Volume 3, Appendix 8-3-2-2 Landscape and Visual Assessment Sheets (Significant) [APP-191] (refer to Cumulative Development Effects in Section4). In combination effects (also referred to as Intra-project effects) which happen when one single project creates multiple different impacts that affect the exact same receptor. For example, the effect

Reference	Theme	Issue	Comments	Applicant's Response
				of noise, dust, and visual disruption from a single nearby construction site are set out in ES Volume 1, Chapter 21 Cumulative and In Combination Effects [APP-073]. The Applicant's Assessment on Landscape Character for Deadline 5 will also consider the Inter Cumulative landscape effects of the Scheme and the Cumulative Development Sites from the included list. This will assess the effects on the generic Landscape Type and it's corresponding Landscape Character Areas by assessing the effects on their key features (which include the physical components of the landscape: landform (hills and valleys), land cover (woodlands and rivers), and settlement (towns and farmsteads) which together, define an area's character and "sense of place".
WC1-180	Cumulative and In-Combination Effects	9.30 Applicant's Response to Comments Received at	20.36. The Applicant's response has been to merely reiterate the assertions made in the Technical Note, with which the council disagrees.	Please refer to the Applicant's response above.

Reference	Theme	Issue	Comments	Applicant's Response
		Deadline 2 [REP3-129]		
WC1-181	Cumulative and In-Combination Effects Landscape and Visual	9.30 Applicant's Response to Comments Received at Deadline 2 [REP3-129]	Comment WCD1-181 20.37. Technical Note Section 4: Significant Intra Project Cumulative Visual Effects [REP1-122] states that that the intra project cumulative visual effects have been robustly assessed, however the council maintains its disagreement with this and finds that the Technical Note provides no additional evidence that the effects have been adequately or accurately assessed and therefore maintains its view that it does not agree with the Applicant's methodology or findings in this respect. 20.38. The Applicant does not agree with the council's position on this matter.	Please refer to the Applicant's response above.
WC1-182	Cumulative and In-Combination Effects	9.30 Applicant's Response to Comments Received at	Comment WCD1-182 20.39. The Technical Note on Cumulative Sequential Visual Effects [REP1-123] only considers inter-project	The Technical Note on Cumulative Sequential Visual Effects [REP1-123] does consider the intra project sequential effects, where receptors move through the Lime Down project

Reference	Theme	Issue	Comments	Applicant's Response
	Landscape and Visual	Deadline 2 [REP3-129]	cumulative effects (that is, Lime Down with other solar or related infrastructure projects within the wider study area) and does not address intra-project sequential effects, where receptors move through the Lime Down project area and experience views of two or more proposed development areas A – E in sequence, or an individual development area from a sequence of viewpoints. These effects are of particular relevance to residents and other receptors travelling through the site. However, the Applicant has not considered these potential effects and, as it has with the Combined Cumulative effects discussed above' has decided to rely on the individual effects on certain parts of the routes, giving the justification that: <i>"These routes all utilise a combination of PRow and Public Highway, and as such are made up of lots of individual sections of various footpaths, bridleways, roads etc. as identified within Table 8-23 of the LVIA. Sequential Effects for users of these Recreational Routes are not considered</i>	area and experience views of two or more proposed development areas A – E in sequence, or an individual development area from a sequence of viewpoints. The routes were described in Sections. For each of the sequential routes. Sections C-D, D-E and E-F of the Fosse Way pass through the Lime Down Scheme. Section 3 of the Technical Note describes the baseline description in relation to the visibility of Sites B and C. In each description of these section it is noted that there is no visibility to any existing or proposed CD Sites. The assessment on the Fosse Way concluded: the effects on users of the Fosse Way, (Receptor TR145 and TP033) are as set out in the LVIA in ES Volume 3, Appendix 8-3-2-2: Landscape and Visual Assessment Sheets (Significant) [APP191]. The sequential effects to users of the Fosse Way are due to the Scheme (Sites B and C) which would introduce some detracting

Reference	Theme	Issue	Comments	Applicant's Response
			<i>to be any greater than those effects identified for the individual sections as set out within ES Volume 3, Appendix 8.3 ES LVIA Assessment Sheets [APP 191].</i> This does not address the sequential effects of those passing along the well-used yet minor roads passing through the site at all.	features to existing highly sensitive and well composed views, resulting in a noticeable deterioration of existing views from the Fosse Way. This is due to Lime Down Sites B and DC (noting typo) with no additional sequential effect arising from the existing solar farm at Newton Dairy approximately 7km away.
WC1-183	Cumulative and In-Combination Effects Landscape and Visual	9.30 Applicant's Response to Comments Received at Deadline 2 [REP3-129]	20.40. The concern is explained in full at paragraph 8.23 of Wiltshire Council's Relevant Representation [RR-4934] , which states: "Secondly, a sequential assessment must be undertaken. Sequential visual effects occur when an observer moves along what would be considered to be a well-travelled route. In this case the Fosse Way, which is a very popular recreational route is considered to be a key route where sequential effects should be assessed, but there are also PRow and minor road links, particularly routes between settlements and circular routes close to settlements which will require assessment.	A Sequential Assessment has been undertaken within the LVIA which is in accordance with GLVIA3 Table 7.1 that sets out that sequential effects may be assessed for travel along regularly used routes such as major roads or popular paths. Given GLVIA3's referral to major roads, it is important to note that the Department for Transport classifies Major Roads to include motorways and all class 'A' roads. These roads usually have high traffic flows and are often the main arteries to major destinations. Minor roads comprise 'B' and 'C' classified roads in addition to unclassified roads. Major roads locally

Reference	Theme	Issue	Comments	Applicant's Response
			A selection of potential Sequential Visual Effect routes is given at Table 8-23 of ES Chapter 8 [APP-060]. However, these have not been adequately assessed for potential effects and a full description of the effects as the receptor passes though the landscape is required. The ES focusses, erroneously, on Major Roads for determining sequential effects from roads. At ES para 8.10.46 it is stated that GVLIA3 refers to major roads. It does, but only as an example. It also states in GLVIA3 Table 7.1 that: "Sequential effects may be assessed for travel along regularly used routes....". Given the receiving landscape contains very few roads which would be classified as more than minor, it is obvious that these routes are those which are going to be used for travel within the area and therefore the sequential effects of travelling along them must be assessed."	to the Scheme include the M4 and A42 associated with the PV Sites A-E, and the A420, and A4 (Bath Road) associated with the Cable Route Corridor. All other roads locally are classified as Minor. GLVIA3 also suggests that popular paths should also be included within Sequential assessments. Popular paths are those typically considered those to be promoted or recognised in some way such as National Trails, Recreational Routes, long distance trails or locally promoted walks.

Reference	Theme	Issue	Comments	Applicant's Response
WC1-184	Cumulative and In-Combination Effects Landscape and Visual	9.30 Applicant's Response to Comments Received at Deadline 2 [REP3-129]	20.41. The council's position remains unchanged in that the Applicant's ES places undue emphasis on major roads, while overlooking the well-used minor routes that help define the character of the Lime Down project area and from which intra-project sequential effects are likely to be most noticeable.	Please refer to the Applicant's response above.
WC1-185	Cumulative and In-Combination Effects	9.30 Applicant's Response to Comments Received at Deadline 2 [REP3-129]	Comment WCD1-183 20.42. The council does not accept that Sequential Cumulative effects have been adequately assessed and cannot agree the content of the Technical Note. The Applicant disagrees with this position.	With reference Technical Note on Cumulative Sequential Visual Effects [REP1-123] and the Sequential Visual Effect on Wiltshire Cycleway [REP4-078] the Applicant considers the effects of the Lime Down Scheme has been adequately assessed in accordance with GLVIA3. Key guidance on sequential views and effects are quoted below: Paragraph 6.22: <i>"In addition to fixed views, the viewpoints should also, as far as possible, cover important sequential views along key routes and transport corridors. Viewpoints should cover both near and more distant views, though not so distant as to be meaningless, unless it is useful to demonstrate the influence</i>

Reference	Theme	Issue	Comments	Applicant's Response
				<i>of distance</i>". Both sequential assessments include near and more distant views along the routes. 7.36: "<i>Thought must also be given to the way in which any sequential views will be experienced, including the duration of views of other developments in combination with the project.</i>" Both sequential assessments include consideration of the duration of view to the Scheme and other developments, as well the duration between views to the Scheme and other developments. Table 7.1: "Frequently sequential: Where the features appear regularly and with short time lapses between instances depending on speed of travel and distance between the viewpoints. Occasionally sequential: Where longer time lapses between appearances would occur because the observer is moving very slowly and/or there are larger distances between the viewpoints". Both sequential assessments include consideration of

Reference	Theme	Issue	Comments	Applicant's Response
				the distances and time lapses between viewpoints.
WC1-186	Landscape and Visual	9.30 Applicant's Response to Comments Received at Deadline 2 [REP3-129]	Comment WCD1-189 20.43. The Applicant confirms an error in methodology wording. The council notes the Applicant's confirmation that changes to the photomontages are not consequentially required. The council's request for further clarification has therefore been suitably addressed.	The Applicant notes this comment.
WC1-187	Landscape and Visual	9.30 Applicant's Response to Comments Received at Deadline 2 [REP3-129]	Comment WCWR-002 20.44. The Applicant's response is predicated to the council's view on Stop Lime Down's Written Representation comments, as included at para. 3.5.5 [REP1-167], that it is too simplistic to suggest that the landscape sensitivity decreases from west to east, as the influence of the CNL decreases further from the National Landscape boundary.	The Applicant notes this comment.
WC1-188	Landscape and Visual	9.30 Applicant's Response to Comments Received at	20.45. The council notes that the Applicant confirms that Lime Down Sites A, B and C fall within the setting of the CNL. However, that does not mean that	The Applicant considers the setting of the CNL to extend across parts of Lime Down A, B and C, but not across the entirety of the three sites. The applicant

Reference	Theme	Issue	Comments	Applicant's Response
		Deadline 2 [REP3-129]	areas outside the CNL setting are not of High Value and of High Susceptibility to change from the scale and nature of the development proposed. Thus, areas of development around Norton and in the vicinity of Rodbourne (Areas D and E) are likely to be in landscapes of High Value and, depending on the exact development form, the landscape will have a High Susceptibility to change, resulting in a High Sensitivity.	has prepared a plan showing the Spatial Extent of Setting of the CNL which was submitted within the Applicant's Response to the Examining Authority's First Written Questions [REP3-128]. The Applicant considers that the CNL as a designated landscape is recognised as High Value, High Susceptibility and High Sensitivity. Recognising that that the Scheme is not within the CNL itself but that Lime Down Sites A, B and C are within its setting, landscape character within the 1 km and 2km Study Areas have been assessed as High Value, Medium Susceptibility and High to Medium Sensitivity. Sites D and E within the 1km and 2km Study Areas are assessed as Medium Value, Medium Susceptibility and Medium Sensitivity. The applicant considers that this does take account of localised landscape variations, Within the 5km Study Area, in recognition that much of the area is influenced by the CNL Sites A, B and C

Reference	Theme	Issue	Comments	Applicant's Response
				are assessed as High Sensitivity with Sites D and E as Medium Sensitivity. This concurs with the Stop Lime Down assessment, that the sensitivity of the landscape falls across the site from west to east. Please also refer to the response below.
WC1-189	Landscape and Visual	9.30 Applicant's Response to Comments Received at Deadline 2 [REP3-129]	20.46. The Wiltshire Council Renewable Energy Study Landscape Sensitivity Assessment 2023 states: "Landscape sensitivity to these very large schemes would be categorised as "high" sensitivity regardless of location, requiring developers to pay particular attention to this issue in their specific applications". Therefore, as the site has an accepted 'High' Sensitivity, its Value and Susceptibility to the change proposed can only be 'High'.	In full, Para 2.7 of the Wiltshire Council Renewable Energy Study Landscape Sensitivity Assessment 2023 states: <i>"Proposed solar PV developments larger than 120 hectares have not been considered in this assessment. Landscape sensitivity to these very large schemes would be categorised as "high" sensitivity regardless of location, requiring developers to pay particular attention to this issue in their specific applications."</i> As set out, the Sensitivity Assessment has not been undertaken for schemes greater than 120hectares, and so therefore there is no supporting analysis contained within the study to support the

Reference	Theme	Issue	Comments	Applicant's Response
				conclusion that "<i>Landscape sensitivity to these very large schemes would be categorised as "high"</i>". However, para 2.7 clearly sets out that developers should "<i>pay particular attention to this issue in their specific application</i>". In accord with this, the value of the Landscape associated with the Scheme has been robustly assessed within the LVIA. Given the National Landscape status of the CNL, land within this designation has been assessed as having a High Value, consistent with its designation. Land within the Scheme is (mostly) outside the CNL. However, land within the Scheme is in close proximity to the CNL, such as sites A, B and C. The LVIA has assessed land within the setting of the CNL as also being of High Value. This reflects the proximity to the CNL and in parts, its complementary landscape character. Although the character of the landscape is complimentary its condition is not. Land

Reference	Theme	Issue	Comments	Applicant's Response
				within and outside the CNL is distinctly different. There is a visible absence of stone walls within the landscape outside of the CNL, a defining special quality of the CNL which is clearly visible within the CNL. There is also a visual difference in the scale and pattern of fields and associated land use where smaller fields of pasture are characteristic within the CNL whilst larger arable fields define the landscape beyond the CNL. The landscape to the west of the Scheme which contains sites D and E is considered to be good quality ordinary agricultural farmland outside of designations with some potential for substitution. Therefore as concluded within the LVIA, the overall Value of the landscapes within the 1km Local Study Area are considered to be High to Medium reflecting the presence of the Cotswold National Landscape to the north and

Reference	Theme	Issue	Comments	Applicant's Response
				west of the Scheme, and the ordinary agricultural farmland found away from the setting of the CNL. Following ISH 2, the applicant is preparing a Landscape Character Assessment of Character Areas following a request by the ExA (Action Point 14 and 15). This will be submitted at Deadline 5 and will consider the effects of the Lime Down Scheme on the key characteristics; inherent landscape sensitivities; and broad management objectives for the Landscape Types and corresponding Landscape Character Areas as defined in the Wiltshire County Assessment and the Local North Wiltshire Assessments.
WC1-190	Landscape and Visual	9.30 Applicant's Response to Comments Received at Deadline 2 [REP3-129]	Comment WCWR-003 20.47. The Applicant's response does not address the council's concerns at paragraph 8.37 to its Relevant Representation [RR-4934] which states: There is also concern that some essential mitigation measures necessary to mitigate ecological harm	The Applicant has not simply sought to mitigate effects associated with the Development. Using the avoidance measures embedded within the Scheme the Applicant has retained land within the Order limits to provide positive enhancements within the setting of the CNL. With reference to the CNL Board's Submissions Received at Deadline 3

Reference	Theme	Issue	Comments	Applicant's Response
			are also being presented and possibly double counted as landscape enhancement, but without also acknowledging the harm it seeks to mitigate or compensate for, potentially skewing assessment scores. This is viewed to be relevant to consideration of positive environmental enhancement within the overall consideration of planning balance. 20.48. Therefore, the council's concern remains extant at this time and has not been adequately addressed.	[REP3-154] the CNL Board have confirmed that: "Notwithstanding the Board's conclusions on the net harm to the Cotswolds National Landscape arising from the Scheme, we consider that the Applicant has sought to further its natural beauty through the proposed enhancement measures located in the setting of the CNL, including some of those outlined at Table 19 of ES Appendix 8-6 such as 60 hectares of wildflower meadow and 63 hectares of set aside for ground nesting birds. These would comprise enhancements to the CNL's setting above and beyond the current baseline condition on land which is visually connected to, and has a complementary landscape character to, the adjacent CNL".
WC1-191	Arboriculture	9.30 Applicant's Response to Comments Received at Deadline 2 [REP3-129]	Comment WCWR-005 20.49. The council agrees with the points made by Stop Lime Down (SLD) about over-reliance on existing vegetation providing screening	Through the DCO the Applicant is not seeking compulsory powers for land beyond the Order Limits, and therefore all landscape mitigation being provided

Reference	Theme	Issue	Comments	Applicant's Response
			throughout the whole operational lifespan of development. The future management of 3rd party hedgerows and woodland over the very large project area would reasonably and foreseeably include periodic hedgerow reductions cutting / laying, harvesting timber from managed woodland, or tree loss through disease or climatic effect etc. 20.50. The Applicant's response does not make clear the way in which this issue could be effectively dealt with throughout the lifespan of the project.	by the Scheme is being undertaken within the Order Limits. The Outline LEMP [REP3-100] sets out the proposed ongoing General Management Prescriptions for all vegetation within the order Limits. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, which would be required to be substantially in accordance with the Outline LEMP [REP3-100], is secured through Requirement 7 in Schedule 2 of the Draft DCO [REP4-004].
WC1-192	Landscape and Visual	9.30 Applicant's Response to Comments Received at Deadline 2 [REP3-129]	Comment WCWR-006 20.51. From a landscape and visual perspective, the council largely agrees with the SLD report.	The Applicant notes this comment.
WC1-193	Cumulative and In-Combination Effects	9.30 Applicant's Response to Comments Received at	Comment WCWR-009	The Applicant notes this comment.

Reference	Theme	Issue	Comments	Applicant's Response
		Deadline 2 [REP3-129]	20.52. With respect to cumulative and in-combination effects raised by SLD Appendix B to Landscape and Visual Report [REP1-170], please refer to comments included under WCD1 179 – 181 for the council's response to the Applicant.	
WC1-194	Transport and Access Arboriculture	Accompanied Site Inspection (ASI1) [EV5-001] 20.53.	Accompanied Site Inspection (ASI1) [EV5-001] 20.53. During the course of ASI1, a specific area of woodland located at the southwestern edge of Grittleton, was identified by a Grittleton Parish Council representative, Figure 1 (below). They pointed out that the eastern side of this area of mature woodland, will be impacted by the planned construction works to widen the Grittleton Crossroads junction layout, to facilitate the planned AIL / HGV construction route to Lime Down areas A, B and C along Alderton Road. The council further identifies that an existing dry-stone wall is also present bordering the northwest	For clarity, works at Grittleton crossroads do not include tree loss along the edge of the adjacent woodland and /or removal of the dry-stone wall. All mitigation works to facilitate AIL movements are set out in Annex H and described in Table 13-20 of ES Volume 3, Appendix 13-1: Transport Assessment [REP4-038] .

Reference	Theme	Issue	Comments	Applicant's Response
			quadrant of this crossroads separating the woodland from the highway within DCO limits which may also be impacted. Figure 1. Extract from Hedgerow Height Plan (Rev A) (Sheet 18 of 23) [REP3-128]	
WC1-195	Arboriculture Transport and Access	Accompanied Site Inspection (ASI1) [EV5-001] 20.53.	20.54. The council highlights it is currently unclear as to the extent of likely required tree removals or length of dry-stone wall required to facilitate the junction ‘improvement’ works, and correspondingly what the effects will be for these existing woodland or drystone wall landscape fabric components.	The Applicant has set out all vegetation losses associated with the Development within the Written Summary of the Applicant’s Oral Submissions and Responses at Issue Specific Hearing 2 and Responses to Action Points [REP4-085]. For clarity, works at Grittleton crossroads do not include tree loss

Reference	Theme	Issue	Comments	Applicant's Response
				along the edge of the adjacent woodland and /or removal of the dry-stone wall. All mitigation works to facilitate AIL movements are set out in Annex H and described in Table 13-20 of ES Volume 3, Appendix 13-1: Transport Assessment [REP4-038] .
WC1-196	Arboriculture	Accompanied Site Inspection (ASI1) [EV5-001] 20.53.	20.55. The council confirms that this woodland and the dry-stone wall are wholly contained within the designated 'Grittleton Conservation Area' and the 'Cotswold National Landscape'. The potential demolition / partial demolition of this dry-stone wall, alongside removal / felling of trees within Grittleton Conservation Area are viewed by the council as material planning considerations. Depending on the permanence of highway improvement works at this junction, woodland edge re-planting and the re-construction of the dry-stone wall along the back edge of new junction sightlines should be secured as mitigation for these landscape fabric components impacted by the development to conserve important rural fabric components and	As set out in the Applicant's Written Summary of the Applicants Oral Submissions and Responses at Issue Specific Hearing 3 and Responses to Action Points [REP4-083] , the Applicant provided the Grittleton AIL swept path in Annex H of ES Volume 3 Appendix 13-1: Transport Assessment [REP4-057] (Drawing SP21A) which demonstrates that vehicle does not overrun the verge at Grittleton, and no trees will be impacted. Furthermore, the Outline CTMP [REP4-057] sets out any road widening undertaken in the Cotswold National Landscape will use appropriate materials, such as conservation kerbs where practicable, and subject to the technical approval of the highway authority. Conservation kerbs are

Reference	Theme	Issue	Comments	Applicant's Response
			character of the Conservation Area and CNL.	designed for environmentally sensitive areas and provide a high-quality aesthetic finish.
WC1-197	Climate Change and Energy Need	9.33 Climate Response to Wiltshire Council Appendix B of Written Rep and SLD Appendix J1 [REP3-132]	9.33 Climate Response to Wiltshire Council Appendix B of Written Rep and SLD Appendix J1 [REP3-132] 21.1. Following review of the 9.33 Climate Response to Wiltshire Council Appendix B of Written Rep and SLD Appendix J1 [REP3-132], the council considers that there are outstanding issues that are considered significant which remain largely unresolved by the Applicant.	The Applicant makes note of this comment. ES Volume 3, Chapter 7: Climate Change [EN010168/APP/6.1] (Revision 2) submitted at Deadline 5 has been updated where appropriate in response to Relevant Representations.
WC1-198	Climate Change and Energy Need	9.33 Climate Response to Wiltshire Council Appendix B of Written Rep and SLD Appendix J1 [REP3-132]	21.2. The methodology review carried out by CEE, as contained within the report appended to Wiltshire Council's Written Representation, identified various problems and inconsistencies with the Applicant's approach including areas of incompleteness in the assessment, errors in the execution and a lack of evidence supporting some assumptions. CEE attempted to sense	The Applicant makes note of this comment. ES Volume 3, Chapter 7: Climate Change [EN010168/APP/6.1] (Revision 2) submitted at Deadline 5 has been updated where appropriate in response to Relevant Representations. The Chapter includes updated figures and emission factors to incorporate technological advancements and

Reference	Theme	Issue	Comments	Applicant's Response
			check some of the embodied emissions calculations using Environmental Product Declarations (EPDs) from comparable products and concluded that emissions were likely to be underestimated.	evolution in the Scheme's design (including an example EPD for PV arrays). The Scheme's lifetime carbon savings are expected to be between 65,916 tCO ₂ e and 266,507 tCO ₂ e for tracked and fixed panels respectively.
WC1-199	Climate Change and Energy Need	9.33 Climate Response to Wiltshire Council Appendix B of Written Rep and SLD Appendix J1 [REP3-132]	21.3. Not all of the points raised in the Applicant's Climate Response relate or are relevant to the analysis carried out by CEE on behalf of the council on the GHG assessment within the Environmental Statement, so the following paragraphs are structured to mirror the relevant sections and paragraphs within the Applicant's Climate Response for easy reference. The following should be read alongside the Applicant's response, as the Applicant's comments have not been reproduced in the text below to keep the document concise:	The Applicant makes note of this comment. ES Volume 3, Chapter 7: Climate Change [EN010168/APP/6.1] (Revision 2) submitted at Deadline 5 has been updated where appropriate in response to Relevant Representations.
WC1-200	Climate Change and Energy Need	9.33 Climate Response to Wiltshire Council Appendix B of	In Response to 2.1.1 21.4. The IEMA document provides an overview of the GHG accounting methodology but is not itself a	The Applicant makes note of this comment. Guidance and technical documents used to inform the assessment are referenced in ES Volume 3, Chapter 7: Climate Change

Reference	Theme	Issue	Comments	Applicant's Response
		Written Rep and SLD Appendix J1 [REP3-132]	referenced standard for industry. The IEMA guidance itself states that: "The methodology chosen should follow best practice guidance, such as the GHG protocol, and it is not the aim of this guidance to provide this." (Page 19)	[EN010168/APP/6.1] (Revision 2) submitted at Deadline 5, including the GHG Protocol.
WC1-201	Climate Change and Energy Need	9.33 Climate Response to Wiltshire Council Appendix B of Written Rep and SLD Appendix J1 [REP3-132]	21.5. It follows that the GHG Protocol for Project Accounting [https://ghgprotocol.org/project-protocol] is arguably the most appropriate standard to which the IEMA refers.	The Applicant makes note of this comment, and refers to the response to WC1-200.
WC1-202	Climate Change and Energy Need	9.33 Climate Response to Wiltshire Council Appendix B of Written Rep and SLD Appendix J1 [REP3-132]	21.6. The underestimation of embodied carbon emissions (A1–A3 product stage) is a principal concern, as the Applicant's methodology: • Uses incomplete and sometimes incorrect estimates for raw material emissions (A1). • Only partially accounts for supply chain transport emissions (A2).	The Applicant makes note of this comment. ES Volume 3, Chapter 7: Climate Change [EN010168/APP/6.1] (Revision 2) submitted at Deadline 5, addresses Relevant Responses, where considered appropriate. Whilst the solar panel to be used is yet to be confirmed, example EPDs for solar panels similar to those expected to be used, have been compared and used in

Reference	Theme	Issue	Comments	Applicant's Response
			• Omits manufacturing emissions altogether (A3). • Relies on material-based estimates rather than product-level evidence such as Environmental Product Declarations (EPDs).	calculations, which account for embodied emissions (A1-A3).
WC1-203	Climate Change and Energy Need	9.33 Climate Response to Wiltshire Council Appendix B of Written Rep and SLD Appendix J1 [REP3-132]	21.7. CEE's assessment is that the embodied emissions associated with PV panels may have been underestimated by approximately 3.6–4.2 times when compared with comparable products that have published EPDs.	The Applicant makes note of this comment. ES Volume 3, Chapter 7: Climate Change [EN010168/APP/6.1] (Revision 2) submitted at Deadline 5 has been updated where appropriate in response to Relevant Representations. The Chapter presents a proportional approach, and includes updated figures and emission factors to incorporate technological advancements and evolution in the Scheme's design (including an example EPD for PV arrays).
WC1-204	Climate Change and Energy Need	9.33 Climate Response to Wiltshire Council Appendix B of Written Rep and	In Response to 2.1.2 21.8. EPDs were used in the CEE analysis to highlight the difficulty in making carbon assessments of third-party products without detailed knowledge of typical product supply	The Applicant makes note of this comment. ES Volume 3, Chapter 7: Climate Change [EN010168/APP/6.1] (Revision 2) submitted at Deadline 5 has been updated where appropriate in response to Relevant Representations.

Reference	Theme	Issue	Comments	Applicant's Response
		SLD Appendix J1 [REP3-132]	chains. Calculations provided by the Applicant for the Product Stage (A1-A3) were clearly incomplete. Estimates of embodied emissions of the raw materials (A1) were incomplete and in some cases incorrect (e.g. use of steel in PV panels as opposed to alloys). Transport emissions (A2) included shipping and haulage of assembled products from the factory to the site but ignored transport emissions within supply chains. Meanwhile emissions associated with the manufacturing processes (A3) were not included at all.	Please see responses to WC1-198, WC1-202 and WC1-203.
WC1-205	Climate Change and Energy Need	9.33 Climate Response to Wiltshire Council Appendix B of Written Rep and SLD Appendix J1 [REP3-132]	21.9. CEE does not accept that EPDs would necessarily commit a developer to a single product in advance of the detailed design stage, and the UoE analysis used an average of a range of similar panel types from different manufacturers based on weight and power output to demonstrate where estimates from the Applicant showed deviated from those of the actual manufacturers. Where information on supply chains is unknown or unavailable, EPDs provide a useful	The Applicant makes note of this comment. ES Volume 3, Chapter 7: Climate Change [EN010168/APP/6.1] (Revision 2) submitted at Deadline 5 has been updated where appropriate in response to Relevant Representations. Please see responses to WC1-198, WC1-202 and WC1-203.

Reference	Theme	Issue	Comments	Applicant's Response
			reference as they are produced according to a replicable standard which includes emissions at all of these stages.	
WC1-206	Climate Change and Energy Need	9.33 Climate Response to Wiltshire Council Appendix B of Written Rep and SLD Appendix J1 [REP3-132]	21.10. CEE used the Applicant's data to replicate, and used their own analysis to provide contextual comparisons, and found significant errors and weaknesses in the GHG assessment methodology. This critique of the methodology was provided in detail in their original report and almost none have been addressed in the Applicant's response.	The Applicant makes note of this comment. ES Volume 3, Chapter 7: Climate Change [EN010168/APP/6.1] (Revision 2) submitted at Deadline 5 has been updated where appropriate in response to Relevant Representations. The Chapter presents a proportional approach, and includes updated figures and emission factors to incorporate technological advancements and evolution in the Scheme's design (including an example EPD for PV arrays, and Well-To-Tank emissions).
WC1-207	Climate Change and Energy Need	9.33 Climate Response to Wiltshire Council Appendix B of Written Rep and SLD Appendix J1 [REP3-132]	Compliance with NPS requirement to assess emissions from all stages of development: 21.11. CEE highlights NPS EN-1 paragraph 5.3.8, which requires applicants to assess GHG emissions from all stages of development.	The Applicant makes note of this comment. ES Volume 3, Chapter 7: Climate Change [EN010168/APP/6.1] (Revision 2) submitted at Deadline 5 has been updated where appropriate in response to Relevant Representations. Whilst the solar panel to be used is yet to be confirmed, example EPDs for solar

Reference	Theme	Issue	Comments	Applicant's Response
			21.12. CEE's view is that: • Important emissions have been excluded from the Product Stage (A1–A3). • These omissions propagate through later lifecycle stages. • The Applicant should revisit the calculations and assumptions before it can be concluded that the assessment fully satisfies NPS requirements.	panels similar to those expected to be used, have been compared and used in calculations, which account for embodied emissions (A1-A3). Please see responses to WC1-198, WC1-202 and WC1-203.
WC1-208	Climate Change and Energy Need	9.33 Climate Response to Wiltshire Council Appendix B of Written Rep and SLD Appendix J1 [REP3-132]	Operational and lifecycle impacts are affected because construction emissions are underestimated. 21.13. CEE argues that the issue is not confined to construction emissions, because panel replacement assumptions are based on the construction-stage embodied carbon figures, and any underestimation in panel manufacturing emissions carries through to operational emissions and later lifecycle phases. This means the	ES Volume 3, Chapter 7: Climate Change [EN010168/APP/6.1] (Revision 2) submitted at Deadline 5 has been updated where appropriate in response to Relevant Representations.

Reference	Theme	Issue	Comments	Applicant's Response
			whole lifecycle inventory may be materially understated.	
WC1-209	Climate Change and Energy Need	9.33 Climate Response to Wiltshire Council Appendix B of Written Rep and SLD Appendix J1 [REP3-132]	Proposed increase in panel numbers: 21.14. CEE notes that they were not involved in discussions increasing panel numbers from approximately 598,000 to 842,000 panels (around a 41% increase). Their concern is that: • This should increase emissions across construction, operation and decommissioning. • Additional panels are likely to require more inverters, transformers, mounting structures, shipping and transport. • It is difficult to reconcile a >40% increase in panel numbers with a reported emissions increase of only 4.38%.	The Applicant clarifies that the Development Consent Order (DCO) does not specify an upper limit on generation capacity or panel numbers to allow for flexibility to incorporate technological innovations and more efficient solar models at the detailed design stage. The indicative figure of approximately 842,000 panels was utilised to align sensitivity testing for the Climate Change [REP3-132] and Transport [REP3-133] technical notes submitted at Deadline 3 to reflect the maximum physical capacity of the panels which could be delivered to site. This uplifted figure accounts for the potential use of high-cube containers, which can accommodate 720 modules per delivery compared to the 500 modules in standard containers, ensuring the "worst-case" logistical impacts were fully evaluated.

Reference	Theme	Issue	Comments	Applicant's Response
				The ~41% increase in indicative panel numbers does not result in a linear increase in lifecycle greenhouse gas (GHG) emissions because a significant portion of the Scheme's carbon footprint is associated with fixed infrastructure elements including the 400kV substation, scheme wide civil works, and cable route corridor, which do not alter in scale based on the number of modules installed. ES Volume 3, Chapter 7: Climate Change [EN010168/APP/6.1] (Revision 2) submitted at Deadline 5 has been updated, including evaluation of both tracked and fixed panel configuration. The assessment accounts for the different number of panels and associated infrastructure through all phases of the Scheme, as well as the different yield of electricity generation.a
WC1-210	Climate Change and Energy Need	9.33 Climate Response to Wiltshire Council Appendix B of Written Rep and	Carbon benefits and avoided-emissions claims may be overstated 21.15. CEE does not challenge the value of solar generation itself but	The Applicant makes note of this comment. ES Volume 3, Chapter 7: Climate Change [EN010168/APP/6.1] (Revision 2) submitted at Deadline 5 has been updated where appropriate in response to Relevant Representations.

Reference	Theme	Issue	Comments	Applicant's Response
		SLD Appendix J1 [REP3-132]	questions aspects of the Applicant's avoided-emissions narrative.	Updates include clarification of conclusions regarding avoided emissions.
WC1-211	Climate Change and Energy Need	9.33 Climate Response to Wiltshire Council Appendix B of Written Rep and SLD Appendix J1 [REP3-132]	21.16. Key concerns are related to the fact that grid carbon intensity is expected to decline rapidly during the lifetime of the Scheme, therefore it was felt that it was potentially misleading to suggest that the avoided grid emissions in the first year of operation would be maintained throughout the life of the project.	The Applicant notes this comment. ES Volume 3, Chapter 7: Climate Change [EN010168/APP/6.1] (Revision 2) submitted at Deadline 5 has been updated where appropriate in response to Relevant Representations. The lifecycle greenhouse gas intensity of the Scheme was compared with the projected UK grid carbon intensity in the first year of operation (2029) to provide context regarding the carbon performance of the Scheme at the point electricity generation commences. The Applicant acknowledges that projected grid carbon intensity may reduce to levels below the calculated lifecycle carbon intensity of electricity generated by the Proposed Development during the operational life of the Scheme. However, the comparison presented in ES Chapter 7 was not intended to forecast the relative carbon intensity of the Scheme and the

Reference	Theme	Issue	Comments	Applicant's Response
				grid over the entire operational lifetime, nor to imply that the level of avoided emissions observed in the first year of operation would remain constant. The purpose of the comparison was to provide context regarding the carbon performance of the Scheme at the point of commissioning using the DESNZ projections. Changes in future grid carbon intensity do not alter the lifecycle emissions calculated for the Proposed Development or the conclusions of the climate assessment.
WC1-212	Climate Change and Energy Need	9.33 Climate Response to Wiltshire Council Appendix B of Written Rep and SLD Appendix J1 [REP3-132]	21.17. Depending on which DESNZ Green book factors are used, grid emissions fall below the operational emissions for the scheme quoted by the Applicant within 4–6 years. For the remainder of the project lifetime grid emissions factors are projected to be lower and continue to decrease to near zero by 2049.	The Applicant notes this comment. ES Volume 3, Chapter 7: Climate Change [EN010168/APP/6.1] (Revision 2) submitted at Deadline 5 has been updated where appropriate in response to Relevant Representations. Please refer to comments provided in relation to WC1-211.
WC1-213	Climate Change and Energy Need	9.33 Climate Response to Wiltshire Council	Lack of transparency over overseas supply-chain emissions and significance	The Applicant makes note of this comment.

Reference	Theme	Issue	Comments	Applicant's Response
		Appendix B of Written Rep and SLD Appendix J1 [REP3-132]	21.18. CEE disagrees with the Applicant's focus on territorial emissions in terms of assessing the Scheme's emission and their significance.	
WC1-214	Climate Change and Energy Need	9.33 Climate Response to Wiltshire Council Appendix B of Written Rep and SLD Appendix J1 [REP3-132]	21.19. Paragraph 5.2.3 notes that grid intensity figures do not include GHG emissions from imported products and materials, while the Scheme's GHG assessment included within ES Chapter 7 [APP-059] does, resulting in an asymmetrical comparison. The council understands the complexity of assessing significance of the magnitude of emissions.	The Applicant makes note of this comment.
WC1-215	Climate Change and Energy Need	9.33 Climate Response to Wiltshire Council Appendix B of Written Rep and SLD Appendix J1 [REP3-132]	21.20. The NPS in Section 5.3.4 is clear that residual emissions are to be expected within energy infrastructure projects but does not specify that GHG assessments should be carried out on a territorial basis. The SoS determination is also made without reference to individual projects for their contribution to carbon budgets (5.3.12) so it seems unnecessary and arguably less transparent to model emissions	The Applicant makes note of this comment.

Reference	Theme	Issue	Comments	Applicant's Response
			significance on a territorial basis alone where a large proportion of emissions are generated overseas.	
WC1-216	Climate Change and Energy Need	9.33 Climate Response to Wiltshire Council Appendix B of Written Rep and SLD Appendix J1 [REP3-132]	21.21. In relation to paragraph 6.1.1 and 6.1.2 CEE observations were designed to demonstrate that the concept of significance cannot be sensibly determined on the basis of an isolated percentage. It does not seem true to say that because 0.49% is a 'small' number in relative terms, 0.49% of the UK annual carbon budget is also not significant. When the SoS makes their eventual determination, it will presumably be with more complete knowledge of comparable schemes which will provide the necessary context. The council and CEE can therefore make no judgment about the relative significance of the scheme but highlight instead the shortfall of the metric provided in isolation.	The Applicant makes note of this comment. ES Volume 3, Chapter 7: Climate Change [EN010168/APP/6.1] (Revision 2) submitted at Deadline 5 has been updated where appropriate in response to Relevant Representations. The Chapter compares the operational carbon intensity of the Scheme under two configuration scenarios with those of other electricity generating means.
WC1-217	Climate Change and Energy Need	9.33 Climate Response to Wiltshire	21.22. UK GHGI and carbon budgets are reported on a territorial basis so that they can be brought together with those	The Applicant makes note of this comment.

Reference	Theme	Issue	Comments	Applicant's Response
		Council Appendix B of Written Rep and SLD Appendix J1 [REP3-132]	of other counties to assist with reporting on global budgets. UK greenhouse gas emissions (GHGs) are also reported on a production and consumption basis because taken together these provide a more complete picture of the sources and magnitude of our emissions.	
WC1-218	Climate Change and Energy Need	9.33 Climate Response to Wiltshire Council Appendix B of Written Rep and SLD Appendix J1 [REP3-132]	9.34 Applicant's Response to Stop Lime Down Written Representation – Appendix D Transport Report [REP3-133]	The Applicant makes note of this comment.
WC1-219	Climate Change and Energy Need	9.33 Climate Response to Wiltshire Council Appendix B of Written Rep and SLD Appendix J1 [REP3-132]	22.1. In paragraph 2.1.7 it is stated that "The figures within the Applicant's analysis were derived from a detailed breakdown of construction activities provided by a contractor based on the layouts design by the Applicant" and "It is noted that NPS EN-3, paragraph 2.10.17, indicates that 2-4 acres will be required for each MW of output, with 50MW of generation requiring 125 to	The Applicant has submitted revised trip generation calculations in the same format as the SLD calculations at Deadline 5. This document is titled ' Highways Technical Note in response to Appendix A of the SLD Deadline 4 submission ' [EN010168/EXAM/9.64] . This sets out module densities and how they compare to other solar farm sites

Reference	Theme	Issue	Comments	Applicant's Response
			200 acres and 100,000 to 150,000 panels. This equates to a panel density of 750 to 800 panels per acre; or, were one to fit 150,000 panels on only 125 acres, a maximum density of 1,200 panels per acre. The fenced area containing solar panels in Lime Down is 469 ha (1159 acres). Assuming this area was entirely filled with panels (which the Applicant does not consider to be realistic), this would still only result in 1,390,800 panels being laid within the 1159-acre area". Annex E to the latest Transport Assessment (Rev 3) [REP3-066] still advises that the overall PV component quantum over the five Lime Down Solar Park sites is expected to be 588,988, which based on the 469ha (1159 acre) area would yield a PV Module density of 508 per acre. This would appear to be insufficient to generate the 1MW output sought from every 2.4-acre area equipped with panels.	and the assumed densities set out in EN-3. Further to this, ES Volume 3, Chapter 7: Climate Change [EN010168/APP/6.1] (Revision 2) submitted at Deadline 5 has been updated where appropriate in response to Relevant Representations.
WC1-220	Climate Change and Energy Need	9.33 Climate Response to Wiltshire	22.2. The Applicant's response further states that "The Applicant's HGV analysis includes 1200 Solar PV Panel	The Applicant has submitted revised trip generation calculations in the same format as the

Reference	Theme	Issue	Comments	Applicant's Response
		Council Appendix B of Written Rep and SLD Appendix J1 [REP3-132]	deliveries on standard HQ containers carrying 500 in each (600,000 panels). If high cube containers are used these can transport 720 Solar PV Panels each, which would equate to 864,000 Solar PV Panels". This is noted but, even if this was done, it would just reach the bottom end of the desired density range to generate 1MW for each 2.4-acre area equipped with panels (745 per acre). It also presupposes high cube containers would be available for all PV module deliveries.	SLD calculations at Deadline 5. This document is titled 'Highways Technical Note in response to Appendix A of the SLD Deadline 4 submission' [EN010168/EXAM/9.64]. This sets out module densities and how they compare to other solar farm sites and the assumed densities set out in EN-3. These calculations have now been discussed with SLD's transport consultant. Further to this, ES Volume 3, Chapter 7: Climate Change [EN010168/APP/6.1] (Revision 2) submitted at Deadline 5 has been updated where appropriate in response to Relevant Representations.
WC1-221	Climate Change and Energy Need	9.33 Climate Response to Wiltshire Council Appendix B of Written Rep and	22.3. No part of the Applicant's response responds to Table 2 in the SLD report, which showed the typical HGV / ha ratios for PV Module / Mounting Structure deliveries at other solar array sites. This remains a concern, as what is assumed for Lime	The Applicant has submitted revised trip generation calculations in the same format as the SLD calculations at Deadline 5. This document is titled ' Highways Technical Note in response to Appendix A of the SLD Deadline 4

Reference	Theme	Issue	Comments	Applicant's Response
		SLD Appendix J1 [REP3-132]	Down is clearly less than any of the other comparison sites by a considerable margin. As noted, the Applicant has not responded to or sought to rebut the information in this table or explain why the predicted HGV / ha ratio PV Module / Mounting Structure deliveries is so low in the case of Lime Down and reasons for it.	submission' [EN010168/EXAM/9.64]. This sets out module densities and how they compare to other solar farm sites and the assumed densities set out in EN-3. These calculations have now been discussed with SLD's transport consultant. Further to this, ES Volume 3, Chapter 7: Climate Change [EN010168/APP/6.1] (Revision 2) submitted at Deadline 5 has been updated where appropriate in response to Relevant Representations.
WC1-222	Climate Change and Energy Need	9.33 Climate Response to Wiltshire Council Appendix B of Written Rep and SLD Appendix J1 [REP3-132]	22.4. Paragraph 2.1.22 states that "An allowance for the removal of spoil was included within the HGV trip generation figures under general, however, it is proposed that spoil will remain within the Order Limits. In addition, a 50% uplift has been applied to all projected HGV construction movements. This has been incorporated across all construction activities and delivery operations including the removal of spoil and building compound areas". The	It has been assumed that any excavated material will remain on site. In the event of any spoil being taken off site, where possible this will be undertaken by the same tippers used for incoming supply of aggregate. While it is anticipated that most of the spoil from the construction of access tracks etc. will remain on site, the calculations

Reference	Theme	Issue	Comments	Applicant's Response
			assertion that spoil will remain within the Order Limits seems at odds with the 7.16 Outline Site Waste Management Plan (Revision 2) [REP1-103] . Table 3 to the OSWMP estimated that the volume of excavated soil that was likely to be deemed unsuitable for refill and compaction was circa 139,666 cubic metres. As this is defined as a Waste Type, then it would not be unreasonable to assume that the entirety of this volume, or at least a proportion, would need to be exported off-site by HGVs (10m tippers). It is unclear what would be done with this quantum of unacceptable material if left stockpiled on site.	at Annex E of ES Volume 3, Appendix 13-1: Transport Assessment [REP1-057 and REP1-059] allow for general construction activities, including the removal of spoil, other construction waste and the installation and removal of construction compounds. The waste assessment outlined in ES Volume 1, Chapter 20 Other Environmental Matters [APP-072] and Outline Site Waste Management Plan [REP1-102] takes a worse case for the purpose of waste assessment only that the volume of excavated soil that is likely to be deemed unsuitable for refill and compaction is circa 139,666 cubic metres. As stated above it is anticipated that most spoil would reused on onsite.
WC1-223	Transport and Access	9.33 Climate Response to Wiltshire	22.5. With respect to the 'Highway Code' and passage safety widths	The Applicant makes note of this comment.

Reference	Theme	Issue	Comments	Applicant's Response
		Council Appendix B of Written Rep and SLD Appendix J1 [REP3-132]	between NMU and HGVs the Applicant concludes: • Passing Pedestrians - 2m space + 0.5m pedestrian width + 2.5m HGV width = 5m road width • Passing Cyclists - 1.5m space + 1m cyclist width + 0.5m gap to kerb + 2.5m HGV width = 5.5m road width • Equestrians - 2m space + 1.5m equestrian width + 2.5m HGV width = 6m road width	
WC1-224	Transport and Access	9.33 Climate Response to Wiltshire Council Appendix B of Written Rep and SLD Appendix J1 [REP3-132]	22.6. This is less than the 5.5m and 6.0m assessed by SLD for pedestrians / cyclists, as the Applicant makes no allowance for any margin between the vehicle and the nearside carriageway edge. This could thus lead to the vehicle wheel-track being along the extreme edge of these rural carriageways which are generally not kerbed, so increasing the risk of localised edge damage / failure. It is clear from the swept path analysis carried out to date for a car / HGV and two HGVs that this minimum width considered desirable for NMU	While there would be a small margin between the vehicle nearside edge, it has been demonstrated that passing places are available within the usable carriageway width for pedestrians. In addition, the Outline CTMP [REP4-057] provides for road traffic condition surveys and rectification of any damage caused by construction traffic. The inclusion of key highway links requested by WC have been included in Section 6.12. The Applicant is therefore bound by Requirement 15 in Schedule 2 to

Reference	Theme	Issue	Comments	Applicant's Response
			safety will not be met along long lengths of the narrow rural lanes proposed for construction access. However, it is accepted that, in some locations, the presence of suitable flat verges will give pedestrians an opportunity to stand clear of the carriageway when an HGV passes.	the Draft DCO [REP4-004] to rectify any damage to the highways. It is noted that pedestrians will be able to use suitable flat verges where available.
WC1-225	Socio-Economics, Tourism and Recreation	Responses to ExA's First Written Questions (ExQ1) from January Farrington [REP3-163]	23.1. Wiltshire Council are pleased to note that following its suggestion, which was also supported by the ExA, the Applicant is currently carrying out a survey of the equine sector. The Applicant has not supplied the details or who they have sent the survey to, therefore the council reserves comments on its relevance or robustness until it has had a chance to review the results.	The Applicant refers to the Equine Business Report [EN010168/EXAM/9.62] submitted at Deadline 5, and in particular Section 1.3: Approach to Assessing Potential Impacts on Employment and Business Viability.
WC1-226	Cultural Heritage	Written Representation from Vanessa Jayne Shipp [REP3-174]	24.1. As previously commented, Wiltshire Council are in agreement with Ms Shipp's assessment of the impact of the proposed compound on the business that operates at Grittleton House, with the potential repercussions on the maintenance of a significant	As stated in Applicant's Response to the Local Impact Report [REP2-038] the Applicant has identified that will be no impact to the character and appearance of heritage assets as a result of the installation of cabling. With regards to Grittleton House (NHLE

Reference	Theme	Issue	Comments	Applicant's Response
			historical building. The council's preferred option would be the re-location of the compound. Failing that then a comprehensive compensation scheme should be agreed with relevant stakeholders, as previously proposed.	1022310), the assessment concludes that, whilst the asset has a historic association with some land within the Scheme, it no longer maintains a relationship with those lands and there would be no harm to its significance or setting arising from the Scheme. The Applicant does not consider it likely there would be a significant adverse effect to the business operations at Grittleton House. Prior to and during the construction period, coordination will be supported by the Community Liaison Group, secured through Requirement 4 of the DCO, which will provide a formal and ongoing forum for the venue to manage its event schedule alongside the project's construction logistics. The Applicant considers the matter of monitoring local businesses during the Scheme to remain under discussion and is not yet agreed, as stated in paragraph 4.3 of Wiltshire Council's response.

Reference	Theme	Issue	Comments	Applicant's Response
WC1-227	Ecology and Biodiversity	Responses to ExA's First Written Questions (ExQ1) from Natural England [AS-018]	EB1.2 25.1. Natural England's (NE) response has been reviewed and the council notes that it includes the following statement: "It is noted that further ecological surveys will be carried out to identify features with greatest value to species, the applicant states that the results of these surveys will be used to microsite cable trenches to avoid impacts to these features. The use of micro siting to avoid impacts to these features is welcomed."	The Applicant notes this comment
WC1-228	Ecology and Biodiversity	Responses to ExA's First Written Questions (ExQ1) from Natural England [AS-018]	25.2. Wiltshire Council maintains its stance that 'further ecological surveys' should have been undertaken early in the design process and prior to submission of the DCO application rather than any such necessary survey being delayed until the detailed design and micro-siting stage. It is noted that NE specifies that the surveys will identify features with greatest value to species. Nonetheless, the Council's view is that this should have already	The Applicant does not agree that the ecological baseline for the Cable Route Corridor is inadequate to underpin either ES Chapter 9 [REP4-011] or the HRA Report [REP3-090] . The Applicant recognises that CIEEM's Guidelines for Ecological Impact Assessment (2018) and BS 42020:2013 require ecological surveys to be appropriate and proportionate to the nature, scale and likely ecological risks of the proposed development. The

Reference	Theme	Issue	Comments	Applicant's Response
			been established to ensure that adequate ecological baseline data regarding the presence / likely absence of species / species groups together with details of species assemblages and population sizes had been collated in order to inform 6.1 ES Volume 1 Chapter 9 Ecology and 7.10 Habitats Regulations Assessment Report (HRA) and to inform the formulation of appropriate and adequate avoidance, mitigation and compensation measures in full accordance with the principles of the mitigation hierarchy and best practice as detailed in Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine (CIEEM, 2018) and BS 42020:2013 Biodiversity: Code of practice for planning and development (British Standards Institute, 2013). Suitably comprehensive ecological baseline data is also needed to enable determination regarding whether any protected species mitigation licences are required to allow works to proceed lawfully by virtue of a legal derogation	Applicant considers that the survey strategy adopted for the Scheme accords with those principles. Whilst targeted species-specific surveys have been undertaken where appropriate, including at the Solar PV Sites, it was not considered proportionate to undertake comprehensive species-specific surveys throughout the Cable Route Corridor, particularly under the circumstances where the final construction footprint will only be established through detailed design and where impacts on protected species can be avoided through micro-siting and through management at the construction phase (for instance through sensitive timing and methods of working). Where detailed design or pre-construction surveys identify that impacts on protected species cannot reasonably be avoided, the Outline EPMS [REP4-055] secures the preparation and implementation of appropriate species-specific mitigation and, where necessary, the obtaining of the relevant protected species licences

Reference	Theme	Issue	Comments	Applicant's Response
			from the protective legislative provisions. This is notwithstanding that only likely species absence can be ascertained through survey rather than definite species absence and that as such, even if an appropriate level of Phase 2 survey is undertaken early on in the design of a Scheme, the potential for a previously unencountered protected species to be identified at a later stage, such as during pre-commencement surveys or once works have commenced, cannot be completely discounted. In that situation therefore, it may become apparent that a protected species mitigation licence is required.	before works affecting those species commence.
WC1-229	Ecology and Biodiversity	Responses to ExA's First Written Questions (ExQ1) from Natural England [AS-018]	25.3. Suitably comprehensive ecological baseline data obtained early on in the design stage is also imperative to ensure the Scheme design, layout and cable route is informed by the identified ecological features in full compliance with the mitigation hierarchy; and to ensure the Examining Authority (ExA) has sufficient robust information upon which to base its decision regarding	The Applicant refers to the response provided above on the baseline data collection strategy and considers that the ES Chapter 9 [REP4-010] , HRA Report [REP3-090] and Outline EPMS [REP4-055] provide the ExA with sufficient information to understand the likely ecological effects of the Scheme, the basis on which those effects have been assessed, and the mechanisms through which the mitigation hierarchy

Reference	Theme	Issue	Comments	Applicant's Response
			whether to recommend the DCO application for approval.	will continue to be applied during detailed design and construction.
WC1-230	Ecology and Biodiversity	Responses to ExA's First Written Questions (ExQ1) from Natural England [AS-018]	25.4. Wiltshire Council remains of the view that the methodology employed by the Applicant to determine the ecological baseline, both in terms of the desk study and field survey, particularly in respect of the Cable Route Corridor (CRC), is insufficient and not suitably comprehensive to ensure that the Scheme has been designed in a manner that has enabled full application of the mitigation hierarchy. This is especially important given the Applicants decision to rely on the 'Rochdale Envelope' approach.	The Applicant refers to the response provided above on the baseline data collection strategy and considers that the ES Chapter 9 [REP4-010] , HRA Report [REP3-090] and Outline EPMS [REP4-055] provide the ExA with sufficient information to understand the likely ecological effects of the Scheme, the basis on which those effects have been assessed, and the mechanisms through which the mitigation hierarchy will continue to be applied during detailed design and construction.
WC1-231	Ecology and Biodiversity	Responses to ExA's First Written Questions (ExQ1) from Natural England [AS-018]	25.5. A full discussion on the matter of the mitigation hierarchy and approach to survey work is set out in Wiltshire Council's response to Action Point 14 assigned by the ExA during Issue Specific Hearing 3 (ISH3) (Item 3 Ecology and Biodiversity) and in the Council's ISH3 Post Hearing Summary.	The Applicant notes this comment and refers to the Applicant's response to the Council's comments on this matter in WC-121 to WC-126, WC-065 to WC-068, and WC-078 to WC-080.

Reference	Theme	Issue	Comments	Applicant's Response
WC1-232	Ecology and Biodiversity	Responses to ExA's First Written Questions (ExQ1) from Natural England [AS-018]	EB1.5 25.6. Natural England's response to question EB1.5 has been noted by the council. As specified in the council's representations to date, a full suite of bat activity survey within the entire Cable Route Corridor (CRC) was not expected or deemed necessary and would be disproportionate and as such, the council agrees with NE in that regard. Nonetheless, for the reasons already detailed in previous representations on the DCO application, the council would have expected survey of the likely important / key habitats within the section of the CRC that coincides with the greater horseshoe bat consultation zone that extends 4km around the Box Mine component of the Bath and Bradford-on-Avon Bats SAC, as such habitat would likely comprise functionally linked land (FLL).	The Applicant acknowledges the Council's continued concern regarding the scope of surveys undertaken within the Cable Route Corridor. The Applicant has consistently maintained the view that the survey scope and effort for the Cable Route Corridor is appropriate and proportion to the likelihood of significant effects occurring. The Applicant notes the scope for bat surveys within the Cable Route Corridor, (including where it intersects the consultation zone of the Box Mine component of the Bath and Bradford-on-Avon Bats SAC), has been agreed with Natural England as set out in the Statement of Common Ground with Natural England [REP4-064] .
WC1-233	Ecology and Biodiversity	Responses to ExA's First Written	25.7. The proposed avoidance and mitigation measures within CRC where it overlaps with the Bat SAC	The Applicant notes the Council's comments. The Applicant considers the approach to surveys, assessment of

Reference	Theme	Issue	Comments	Applicant's Response
		Questions (ExQ1) from Natural England [AS-018]	consultation zone are acknowledged and welcomed. It is also recognised that 6.1 ES Volume 1 Chapter 9 Ecology and 7.10 HRA has assumed presence of all bat species, and that therefore this must include the Annex II species associated with the SAC (greater horseshoe bat <i>Rhinolophus ferrumequinum</i> , Bechstein's bats <i>Myotis bechsteinii</i> and lesser horseshoe bat <i>Rhinolophus hipposideros</i>). It is considered, however, that the assumption of presence shouldn't preclude proper consideration of the requirements and triggers for survey set out in Natural England's standing advice relating to bats Bats: advice for making planning decisions - GOV.UK). It also shouldn't preclude proper consideration regarding whether the proposed avoidance and mitigation is appropriate and sufficient, as well as ascertaining whether a mitigation licence could be necessitated as a result of the proposed construction and site / vegetation clearance activities.	effects on the Bath and Bradford-on-Avon Bats SA, and the identification of appropriate and proportionate avoidance and mitigation measures as set out within the HRA Report [REP3-090] , including the conclusion of no significant adverse effects is robust. The Applicant notes Natural England is in agreement with the assessment and conclusion.
WC1-234	Ecology and Biodiversity	Responses to ExA's First	25.8. A full discussion on the council's view on the matter of bat surveys is	The Applicant notes this comment and refers to the Applicant's response to the

Reference	Theme	Issue	Comments	Applicant's Response
		Written Questions (ExQ1) from Natural England [AS-018]	detailed in its previous representations and in Wiltshire Council's response to Action Point 14 assigned by the ExA during Issue Specific Hearing 3 (ISH3)(Item 3 Ecology and Biodiversity) and in the Council's ISH3 Post Hearing Summary.	Council's comments on this matter in WC-073.
WC1-235	Ecology and Biodiversity	Responses to ExA's First Written Questions (ExQ1) from Natural England [AS-018]	EB1.7 25.9. Natural England's response includes the following statements: "The Natural England DLL team can confirm that a DLL certificate has been countersigned for in relation to Lime Down Solar Park. This is the final DLL stage a scheme can get to before their planning (or in this case DCO) is approved. Natural England are in agreement with Wiltshire Council that the presence of GCN in any ponds should be properly acknowledged and any associated impacts fully discussed. Natural England are in agreement that the inconsistency between this and the ES should be addressed for clarity, although it is also acknowledged that a	The Applicant notes this comment.

Reference	Theme	Issue	Comments	Applicant's Response
			DLL licence has been applied for and impacts are appropriately addressed through this."	
WC1-236	Ecology and Biodiversity	Responses to ExA's First Written Questions (ExQ1) from Natural England [AS-018]	25.10. Wiltshire Council notes that NE's response appears to suggest that a great crested newt (GCN) district level licensing (DLL) application has been submitted to NE for the entire Scheme / Order Limits. As stipulated in Wiltshire Council's representations to date, most recently in its comments on Deadline 2 submissions [REP3-141] , it is understood that the GCN DLL application relates to the CRC only and not to the Solar PV Sites. This is also evident from a review of the Impact Assessment and Conservation Payment Certificate (IACPC) [REP2-041] submitted to the ExA during Examination, as it details that the application pertains to the CRC element of the Scheme only. Thus, it is not apparent whether NE recognise that the GCN DLL application and resulting IACPC pertain to the CRC only and that it does not cover the Solar PV Sites as well.	The Applicant notes this comment and confirms that the Applicant only intends to register the Cable Route Corridor elements of the Scheme. No enquiry / application has been submitted for DLL covering the entire Scheme.

Reference	Theme	Issue	Comments	Applicant's Response
WC1-237	Ecology and Biodiversity	Responses to ExA's First Written Questions (ExQ1) from Natural England [AS-018]	25.11. As per Wiltshire Council's comments in paragraph 2.13. of its Written Representation [REP1-138] , although the presence of GCN has been confirmed within the Solar PV Sites, the decision regarding whether to obtain a mitigation licence to allow works within the Solar PV Sites to legally derogate from the respective legislative provisions and the proposed mitigation strategy remains unclear.	The Applicant notes this comment. For the Solar PV Sites, the Scheme has been specifically designed to avoid impacts on great crested newts and their supporting habitats wherever reasonably practicable, in accordance with the mitigation hierarchy. This includes avoiding impacts on breeding ponds, maintaining appropriate buffers (minimum 50 m) to retained ponds, retaining and protecting suitable terrestrial habitat where practicable, and implementing precautionary construction methods, ecological supervision and pre-construction checks where required. Through these measures (secured within the Outline EPMS [REP4-055]) the Applicant considers that the risk of committing an offence under the Conservation of Habitats and Species Regulations 2017 (as amended) will be minimal. Natural England's advice contained with sections 1 and 3 of the GCN Mitigation Licence Method Statement template makes it clear that a mitigation licence should only be sought where activities

Reference	Theme	Issue	Comments	Applicant's Response
				cannot reasonably be undertaken without risking an offence. Where impacts can be avoided through embedded design and mitigation, obtaining a licence is neither necessary nor consistent with the application of the mitigation hierarchy. The Applicant has therefore designed the Solar PV Sites to avoid the need for a licence in the first instance. The Applicant therefore maintains that the mitigation strategy for the Solar PV Sites is appropriately precautionary and consistent with relevant legislation and Natural England guidance. In the absence of any identified requirement to derogate from the legal protection afforded to great crested newts, the Applicant does not consider that a mitigation licence is required for the Solar PV Sites.
WC1-238	Ecology and Biodiversity	Responses to ExA's First Written Questions (ExQ1) from	25.12. The council seeks clarification on whether appropriate licensing will be secured and how legal compliance will be ensured in relation to the Solar PV sites.	In the absence of any identified requirement to derogate from the legal protection afforded to great crested newts, the Applicant does not consider

Reference	Theme	Issue	Comments	Applicant's Response
		Natural England [AS-018]		that a mitigation licence is required for the Solar PV Sites.
WC1-239	Ecology and Biodiversity	Responses to ExA's First Written Questions (ExQ1) from Natural England [AS-018]	25.13. For further details of the council's concerns and queries on this matter, please refer to its Written Representation [REP1-138] and review the commentary provided under the sub-heading 'Great Crested Newts and Mitigation Strategy for the Solar PV Sites'.	The Applicant notes this comments and refers to the responses provided on this matter contained within the Applicant's Response to Written Representations [REP2-039] .
WC1-240	Ecology and Biodiversity	Responses to ExA's First Written Questions (ExQ1) from Natural England [AS-018]	25.14. Furthermore, Wiltshire Council considers that it shouldn't be particularly onerous for the Applicant to apply for GCN DLL for the Solar PV Sites as well as the CRC, or to apply to extend the coverage of the existing IACPC; especially as the application already submitted includes survey information collated for the Solar PV Sites (which is also an issue previously raised by the Council given that the DLL application pertains to only the CRC). Obtaining a DLL for the Solar PV Sites in addition to the CRC would ensure legal compliance and that adequate safeguards and	The Applicant notes this comment. For the Solar PV Sites, the Scheme has been specifically designed to avoid impacts on great crested newts and their supporting habitats wherever reasonably practicable, in accordance with the mitigation hierarchy. This includes avoiding impacts on breeding ponds, maintaining appropriate buffers (minimum 50 m) to retained ponds, retaining and protecting suitable terrestrial habitat where practicable, and implementing precautionary construction methods, ecological supervision and pre-construction checks where required.

Reference	Theme	Issue	Comments	Applicant's Response
			compensation will be implemented for the European Protected Species (EPS).	Through these measures (secured within the Outline EPMS [REP4-055]) the Applicant considers that the risk of committing an offence under the Conservation of Habitats and Species Regulations 2017 (as amended) will be minimal. Natural England's advice contained within sections 1 and 3 of the GCN Mitigation Licence Method Statement template makes it clear that a mitigation licence should only be sought where activities cannot reasonably be undertaken without risking an offence. Where impacts can be avoided through embedded design and mitigation, obtaining a licence is neither necessary nor consistent with the application of the mitigation hierarchy. The Applicant has therefore designed the Solar PV Sites to avoid the need for a licence in the first instance. This approach differs from that adopted for the Cable Route Corridor, where the precise locations of construction activities cannot be fixed until detailed design. In those circumstances, the

Reference	Theme	Issue	Comments	Applicant's Response
				Applicant has appropriately secured access to the District Level Licensing Scheme through an Impact Assessment and Conservation Payment Certificate countersigned by Natural England [REP2-041]. The differing approaches therefore reflect the differing nature of the potential impacts and are considered to represent a proportionate application of the mitigation hierarchy. The Applicant therefore maintains that the mitigation strategy for the Solar PV Sites is appropriately precautionary and consistent with relevant legislation and Natural England guidance. In the absence of any identified requirement to derogate from the legal protection afforded to great crested newts, the Applicant does not consider that a mitigation licence is required for the Solar PV Sites.
WC1-241	Ecology and Biodiversity	Responses to ExA's First Written Questions (ExQ1) from	25.15. The council deems that the Applicant has not provided a robust rationale to defend its current position; nor has sufficient evidence to demonstrate that the works within the Solar PV Sites has a low likelihood of	The Applicant refers to the response above on the subject of the rationale for not acquiring GCN DLL for the Solar PV Sites.

Reference	Theme	Issue	Comments	Applicant's Response
		Natural England [AS-018]	resulting in an offence as a result of impacts on GCN and / or its habitat / resting places been provided. It is considered that the proposed avoidance and mitigation measures will not sufficiently reduce the risk of harm to the species or the risk of contravening the legislative provisions. Moreover, there appears to be no sound reason not to acquire a GCN DLL for the whole Order Limits and the ExA is strongly encouraged to insist on this approach, should the ExA be minded to recommend approval of the DCO application.	
WC1-242	Ecology and Biodiversity	Responses to ExA's First Written Questions (ExQ1) from Natural England [AS-018]	EB1.11 25.16. Natural England's response includes the following: "To enable schemes to move White-clawed crayfish to safety wherever possible, Natural England does issue a standardised type of licence called a 'class' licence to enable schemes to do this as easily as possible, provided	The Applicant notes this comment and refers to the response provided to question EB1.11 (pages 260 to 263) within the Applicant's Response to Other Parties' Responses to Examining Authority's First Written Questions [REP4-081] .

Reference	Theme	Issue	Comments	Applicant's Response
			schemes can comply with this licence's conditions. Based on the information presented in ES Volume 1, Chapter 9: Ecology and Biodiversity (May 2026), it is unclear whether a protected species licence is being sought. No site-specific surveys have been undertaken; instead, the Applicant has assumed the possible presence of the species based on desk study records and the availability of suitable habitat along the cable route corridor. The Applicant has stated that impacts will be avoided, where possible, through micro-siting of the cable route or the use of alternative crossing methods. However, where impacts cannot be avoided, the applicant states that mitigation measures will be implemented. These measures include approaches designed to minimise damage to ditches and watercourses that may support white clawed crayfish, as well as to reduce the risk of direct harm to individuals. This may include seasonal timing of works to avoidance sensitive periods.	

Reference	Theme	Issue	Comments	Applicant's Response
			Wiltshire County Council are correct to raise that temporary or permanent crossings are proposed with a width of 6m within assumed White Clawed Crayfish habitat. Natural England agrees that more detail is required to understand how the applicant intends to approach White-clawed crayfish- both lawfully and within best practice. Further advice from Natural England on how to undertake developments sensitively around White clawed crayfish habitats is available through our standing advice, which can be found at https://www.gov.uk/guidance/white-clawed-crayfish-advice-for-making-planning-decisions ."	
WC1-243	Ecology and Biodiversity	Responses to ExA's First Written Questions (ExQ1) from Natural England [AS-018]	25.17. Wiltshire Council welcomes and concurs with much of the response provided by NE and therefore maintains the stance already set out in REP2-048 that the assumption of presence shouldn't preclude proper consideration of the requirements set out in Natural England's standing advice relating to White-Clawed Crayfish. It also shouldn't preclude consideration of whether the	The Applicant notes this comment and refers to the response provided to reference WCD1-047 (pages 47 to 51) within the Applicant's Response to Submissions Received at Deadline 2 [REP3-129] . It remains the Applicant's view that the assessment of potential effects on this species and the identification of appropriate avoidance and mitigation

Reference	Theme	Issue	Comments	Applicant's Response
			proposed avoidance and mitigation is sufficient or whether additional measures are required, as well as whether a mitigation licence could be required to permit 52 some works, especially in light of the three new circa 6m wide permanent accesses for culverts proposed across 'wet' ditches at Lime Down D.	measures are in accordance with the Natural England standing advice referenced.
WC1-244	Ecology and Biodiversity	Responses to ExA's First Written Questions (ExQ1) from Natural England [AS-018]	25.18. As the Council has already specified in previous representations, given the scope of proposed works, especially at Lime Down D where suitable habitat for white-clawed crayfish exists, it is considered that the rationale for the lack of any dedicated survey is somewhat weak as there could still be adverse impacts on the species, if present, despite the mitigation put forward. Also, it is possible that undertaking targeted survey may have led to the conclusion that further mitigation and compensation over and above that proposed, and possibly even a mitigation licence may be necessary to permit some of the work depending on survey results, however this is not	The Applicant notes this comment and refers to the response provided to reference WCD1-047 (pages 47 to 51) within the Applicant's Response to Submissions Received at Deadline 2 [REP3-129]. It remains the Applicant's view that the assessment of potential effects on this species and the identification of appropriate avoidance and mitigation measures are in accordance with the Natural England standing advice referenced.

Reference	Theme	Issue	Comments	Applicant's Response
			known as survey has not been conducted and has not been discussed in the DCO application documents.	
WC1-245	Ecology and Biodiversity	Responses to ExA's First Written Questions (ExQ1) from Natural England [AS-018]	HRA1.2 25.19 Natural England's response to question HRA1.2 from the ExA states: "Further discussions have been undertaken regarding assessment of Lime Down C to provide FLL for lesser horseshoe bats associated with the Bath and Bradford on Avon Bats SAC. Through these discussions, the applicant and Natural England have reached a shared position that Lime Down C should be classed as functionally linked to the SAC. As noted in the Examining Authority's question, mitigation measures to reduce harm on lesser horseshoe bats using this area have been agreed between Natural England and the applicant. Provided these measures are secured in the DCO, Natural England consider that the proposed development would not result in adverse impacts to the integrity of the	The Applicant notes this comment.

Reference	Theme	Issue	Comments	Applicant's Response
			SAC as a result of loss or fragmentation of functionally linked land in Lime Down C. The applicant has shared a revised HRA with Natural England which reflects the above, Natural England have reviewed and agree with the conclusions set out in this report. Regarding avoidance of impacts, previous discussion between the applicant and Natural England included discussion of the inclusion of a minimum of 15m buffer zones to all hedgerows, trees, and woodland edges to avoid impacts specifically to avoid and retain the functionality these habitats provide to bats. Further, retention of potential roosting habitats and associated commuting habitats was discussed and agreed. Habitats within the Solar PV site largely do not represent high quality foraging habitats for SAC bat species due to the limited insect prey biomass which these habitats support. Avoidance of installation of Solar PV within habitats of low foraging value was therefore not	

Reference	Theme	Issue	Comments	Applicant's Response
			considered necessary to minimise impacts to SAC bat species."	
WC1-246	Ecology and Biodiversity	Responses to ExA's First Written Questions (ExQ1) from Natural England [AS-018]	25.20. Wiltshire Council notes NE's response to this question but would just highlight that it has consistently raised concern regarding the approach to bat survey and the implications for the robustness and accuracy of the HRA. The council remains concerned in this regard for the reasons already set out in its previous representations on the DCO application, and as discussed in Wiltshire Council's response to Action Point 14 assigned by the ExA during Issue Specific Hearing 3 (ISH3) (Item 3 Ecology and Biodiversity) and in the Council's ISH3 Post Hearing Summary.	The Applicant acknowledges the Council's continued concern regarding the scope of surveys undertaken within the Cable Route Corridor. The Applicant maintains the view that the survey scope and effort for the Cable Route Corridor is appropriate and proportion to the likelihood of significant effects occurring. The Applicant notes the scope for bat surveys within the Cable Route Corridor, (including where it intersects the consultation zone of the Box Mine component of the Bath and Bradford-on-Avon Bats SAC), has been agreed with Natural England as set out in the Statement of Common Ground with Natural England [REP4-064]. The Applicant maintains the view that the assessment of the Scheme's impacts on the Bath and Bradford-on-Avon Bats SAC set out within the HRA Report [REP3-090], including the conclusion of no significant adverse effects is robust. The Applicant notes

Reference	Theme	Issue	Comments	Applicant's Response
				Natural England is in agreement with the assessment and conclusion.
WC1-247	Arboriculture	Responses to ExA's First Written Questions (ExQ1) from Natural England [AS-018]	25.21. NE's response indicates that their view is based on the assumption that a minimum 15m buffer will be implemented alongside hedgerows, trees and woodland. The council, however, has consistently raised concern about the potential for hedgerow removal afforded by the overly wide scope of Schedule 12, Part 1 and 2 of the dDCO. The council remains concerned about Schedule 12 irrespective of the inclusion of footnotes to Part 1 and Part 2 cross-referencing to hedgerow removal prescriptions set out in the EPMS and the inclusion of Article 40(4). The council has also consistently raised concern about the potential for adverse impacts to ancient woodland, notably North Bincombe Wood bordering Lime Down E where there is potential for adverse impacts and damage to the edge of the woodland which has been subsumed within Order Limits boundary, and that as such, the required 15m buffer zone would not be	Regarding North Bincombe wood, the alignment of the access track has been amended to avoid any incursions into the 15m buffer of North Bincombe Wood. This is shown in ES Volume 2, Figure 3-4-5.1 to 5.2 Landscape and Ecology Mitigation Plan [REP4-016] which has been submitted at Deadline 4. This shows a realigned access track which does not encroach into the 15m buffer zone of North Bincombe Wood. Furthermore Table 4 of the Outline Construction Environmental Management Plan (CEMP) [REP4-049] has been updated to confirm that any upgrades to the existing track which runs alongside North Bincombe Wood will follow a specialist 'no-dig' construction methodology and specification to avoid the need to excavate and potentially incur root damage. It is also stated that no heavy vehicles or machinery will be used along the existing track where it is adjacent to North Bincombe Wood.

Reference	Theme	Issue	Comments	Applicant's Response
			applied at this location. Full details of our comments on this matter are provided in its Relevant Representation [RR-4934] and Local Impact Report [REP1-137] .	
WC1-248	Arboriculture	Responses to ExA's First Written Questions (ExQ1) from Natural England [AS-018]	25.22. Wiltshire Council requires clarity on the access track near North Bincombe Wood. There have been contradictory statements from the Applicant regarding its alignment and use. The Deadline 3 submissions from Lime Down Solar Park Ltd do not appear to include any plans that illustrate that the proposed internal access track has been realigned to avoid incursion into either North Bincombe Wood itself or the requisite 15m buffer to the ancient woodland. The council considers it should be wholly feasible for this information to be provided at this juncture in order to provide sufficient information regarding the purported change in proposals.	The alignment of the access track has been amended to avoid any incursions into the 15m buffer of North Bincombe Wood. This is shown in ES Volume 2, Figure 3-4-5.1 to 5.2 Landscape and Ecology Mitigation Plan [REP4-016] which has been submitted at Deadline 4. This shows a realigned access track which does not encroach into the 15m buffer zone of North Bincombe Wood. Furthermore Table 4 of the Outline CEMP [REP4-049] has been updated to confirm that any upgrades to the existing track which runs alongside North Bincombe Wood will follow a specialist 'no-dig' construction methodology and specification to avoid the need to excavate and potentially incur root damage. It is also stated that no heavy vehicles or machinery will be used along the existing track where it is adjacent to North Bincombe Wood.

Reference	Theme	Issue	Comments	Applicant's Response
WC1-249	Arboriculture	Responses to ExA's First Written Questions (ExQ1) from Natural England [AS-018]	25.23. As it stands, the council's concerns on this matter have not been allayed. Furthermore, the council is not entirely assured that the measures discussed in NE's response and which NE's support are predicated upon, will be wholly implemented across the Order Limits.	The Applicant notes this comment and refers to above response regarding the 15 m buffer from North Bincombe Wood. .
WC1-250	Hydrology, Flood Risk and Drainage	LLFA Position Statement on Hydrology, Flood Risk and Drainage Matters	Introduction 26.1. The Lead Local Flood Authority (LLFA) has reviewed the Deadline 3 submissions insofar as they are relevant to hydrology, flood risk, surface water drainage, runoff generation, erosion risk, soil compaction, vegetation cover, groundwater interaction, watercourse protection and construction-phase water management.	The Applicant notes the scope of the LLFA's review.
WC1-251	Hydrology, Flood Risk and Drainage	LLFA Position Statement on Hydrology, Flood Risk and Drainage Matters	26.2. This review has considered material contained within the Ecology and Biodiversity chapter, Soils and Agriculture chapter, Landscape and Visual Impact Assessment material, Cotswolds National Landscape	The Applicant notes the additional documents considered by the LLFA. These documents provide supporting information relevant to particular hydrological mechanisms, but do not replace the assessment and controls

Reference	Theme	Issue	Comments	Applicant's Response
			assessment, 54 Lime Down A-E desk studies and the revised Outline Construction Traffic Management Plan, but only where those documents are relevant to hydrological performance and flood risk management. Relevant documents include: • ES Volume 1 Chapter 9 Ecology and Biodiversity (Rev 2) [REP1-016], • ES Volume 1 Chapter 17 Soils and Agriculture (Rev 2) [REP1-026], • ES Volume 3 Appendix 8-1 LVIA Methodology (Rev 2) [REP1A-007], • ES Volume 3 Appendix 8-6 Cotswolds National Landscape Assessment (Change Application) (Rev 1) [CR1-035], • ES Volume 3 Appendix 19-1 to 19-5 Lime Down A-E desk studies (Rev 3) [REP3-070 to REP3-078], and • 7.22 Outline Construction Traffic Management Plan (Change Application) (Rev 3) [CRI-042].	contained within ES Chapter 11 [REP4-012], the FRA and Drainage Strategy suite [REP4-021 to REP4-035], the Outline CEMP [REP4-049], Outline OEMP [REP4-051], Outline SRMP [REP4-053] and Outline LEMP [REP3-100].

Reference	Theme	Issue	Comments	Applicant's Response
WC1-252	Hydrology, Flood Risk and Drainage	LLFA Position Statement on Hydrology, Flood Risk and Drainage Matters	26.3. The LLFA's review has also been informed by discussions with the Applicant and by technical review of relevant management plans by Wiltshire Council's drainage consultancy support, which is provided by Atkins. The purpose of this submission is to identify matters that are now considered resolved, matters that have been substantially narrowed, and those hydrology-related matters that remain under discussion through the Statement of Common Ground process.	The Applicant welcomes the constructive engagement and the narrowing of the outstanding matters. The Applicant will continue to work with Wiltshire Council through the Hydrology, Flood Risk and Drainage SoCG to identify matters that can be agreed and to define clearly any residual areas of disagreement.
WC1-253	Hydrology, Flood Risk and Drainage	LFA Position Statement on Hydrology, Flood Risk and Drainage Matters	Hydrology-Focused Review and Interpretation of Deadline 3 Evidence Hydrology-Focused Interpretation 26.4. The LLFA considers that the Applicant's updated evidence supports the conclusion that the principal hydrological controls for the Scheme are not traditional piped drainage infrastructure alone, but the combined performance of soils, vegetation, land management, erosion control,	The Applicant agrees that hydrological performance depends on the combined operation of soil condition, vegetation cover, erosion control, watercourse protection and drainage management, rather than piped drainage infrastructure alone. This is consistent with the Applicant's assessment approach. Within panel areas, the principal risks arise from soil compaction, vegetation failure and the creation of preferential runoff pathways, rather than the panels forming a

Reference	Theme	Issue	Comments	Applicant's Response
			watercourse buffer protection and construction-phase drainage management. This is an important shift in understanding because it means that long-term flood risk performance depends on the Site continuing to function hydrologically as intended throughout the operational lifetime of the Scheme.	connected impermeable drainage catchment. These matters are addressed through the site-specific FRA and Drainage Strategies [REP4-021 to REP4-035], the Outline CEMP [REP4-049], the Outline SRMP [REP4-053], the Outline OEMP [REP4-051] and the Outline LEMP [REP3-100].
WC1-254	Hydrology, Flood Risk and Drainage	LFA Position Statement on Hydrology, Flood Risk and Drainage Matters	26.5. The soil-related evidence supports the conclusion that compaction management is central to runoff control. Where soils are compacted, infiltration capacity can be reduced, surface runoff can increase and flow can become more concentrated. Conversely, where soil structure is protected and restored, the Site is more likely to maintain infiltration and reduce rapid runoff response. This makes soil monitoring and remediation a core flood risk matter, not merely an agricultural management issue. This is why the LLFA considers ES Volume 1 Chapter 17 Soils and Agriculture important to the hydrology assessment.	The Applicant agrees that unmanaged soil compaction can reduce infiltration and increase runoff and that its prevention and remediation are therefore relevant to flood risk management. The updated Outline SRMP [REP4-053] provides for monitoring following pile installation and before panels are fixed, use of visual assessment and hand-dug pits to identify the depth and severity of compaction, remediation while the ground remains accessible, and verification that the remedial action has treated the affected soil to the required depth. It also provides for operational monitoring where ponding,

Reference	Theme	Issue	Comments	Applicant's Response
				vegetation failure or other evidence of impaired soil condition is identified.
WC1-255	Hydrology, Flood Risk and Drainage	LFA Position Statement on Hydrology, Flood Risk and Drainage Matters	26.6. The vegetation-related evidence supports the conclusion that ground cover beneath and around panels is a key mitigation mechanism. Vegetation can reduce raindrop impact, slow overland flow, increase surface roughness and reduce erosion potential. However, those benefits depend on vegetation being successfully established, maintained and remediated where necessary. Consequently, the LLFA considers ES Volume 1 Chapter 9 Ecology and Biodiversity relevant only insofar as it gives confidence that vegetation relied upon for hydrological performance will be established, monitored and remediated where necessary.	The Applicant agrees that established vegetation beneath and between the panels contributes to surface roughness, erosion control and the slowing of overland flow. Vegetation establishment, maintenance and replacement are addressed through the Outline LEMP [REP3-100] . The Outline SRMP [REP4-053] also requires operational monitoring for vegetation failure, ponding and soil condition, with further investigation and remedial action where necessary. The Applicant therefore considers that the vegetation relied upon in the hydrological assessment is subject to appropriate monitoring and remediation controls.
WC1-256	Hydrology, Flood Risk and Drainage	LFA Position Statement on Hydrology, Flood Risk and Drainage Matters	26.7. The desk studies show that the proposed Solar PV Sites are not hydrologically uniform. Individual sites contain different combinations of watercourses, ponds, alluvium, groundwater vulnerability, Source	The Applicant agrees that the Solar PV Sites are not hydrologically uniform and that the assessment and management response must reflect local ground conditions, drainage pathways and receptors.

Reference	Theme	Issue	Comments	Applicant's Response
			Protection Zones, groundwater flood susceptibility and Flood Zone constraints. This means that site-specific management is important. A generic management approach may not be sufficient unless it is clearly translated into site-specific inspection, monitoring and remediation requirements. This is particularly relevant to Lime Down C, D and E, where watercourses, flood-sensitive corridors and groundwater sensitivities are prominent features.	This is already reflected in the Scheme's assessment framework. Separate site-specific FRA and Drainage Strategies have been prepared for Lime Down A to E and the Cable Route Corridor, rather than relying on a single generic drainage assessment. These identify the relevant flood risk sources, watercourses, surface water flow routes, groundwater constraints, drainage principles and mitigation for each part of the Scheme through [REP4-023 to REP4-REP4-035]. The more sensitive areas have also been subject to targeted assessment. This includes hydraulic modelling of Gauze Brook at Lime Down D, reported in the Hydraulic Modelling Report [REP3-131], and targeted assessment of Gabriel's Well and associated flood risk at Lime Down E2. The assessments for Lime Down C, D and E identify the relevant local constraints and establish the principles that must be carried through into the final layout and detailed drainage design.

Reference	Theme	Issue	Comments	Applicant's Response
				The management framework is also intended to operate on a site-specific and phase-specific basis. The detailed drainage designs, CEMP, SRMP, LEMP and OEMP will be prepared having regard to the final layout, local soils, topography, drainage connectivity, watercourses and identified receptors for the relevant phase. This allows inspection, monitoring and remediation measures to be focused on the actual risks present at each location rather than applied as a generic Scheme-wide response. The Applicant therefore agrees with the need for site-specific implementation but does not agree that the submitted approach is generic or insufficiently translated into local controls.
WC1-257	Hydrology, Flood Risk and Drainage	LFA Position Statement on Hydrology, Flood Risk and Drainage Matters	26.8. The CTMP demonstrates that the Applicant can provide a clear governance structure where required. It includes monitoring arrangements, reporting procedures, responsibilities, complaints mechanisms and corrective action processes. The LLFA considers this useful because it provides a	The Applicant notes the LLFA's comparison with the Outline CTMP [REP4-057] and agrees that hydrological controls require clear responsibilities, monitoring, reporting and corrective action.

Reference	Theme	Issue	Comments	Applicant's Response
			benchmark for the level of governance clarity that could also be applied to hydrological performance monitoring. In other words, if traffic impacts can be monitored through defined roles, reporting and escalation procedures, then similar clarity should be achievable for drainage, runoff, soil condition and vegetation performance.	The relevant governance is already provided through the subject-specific management plans rather than a single standalone hydrology plan. Construction-phase drainage, runoff, erosion and pollution controls are addressed through the Outline CEMP [REP4-049]. Soil inspection, compaction monitoring, remediation and verification are addressed through the Outline SRMP [REP4-053]. Vegetation establishment, maintenance and replacement are addressed through the Outline LEMP [REP3-100], with operational environmental monitoring provided through the Outline OEMP [REP4-051]. These documents identify the relevant roles and responsibilities and require monitoring, record keeping and remedial action where performance issues are identified. The detailed versions will be prepared for the relevant phase and location, having regard to the final design, local conditions and the specific hydrological controls required.

Reference	Theme	Issue	Comments	Applicant's Response
				The Applicant therefore agrees with the need for clear governance but does not consider that duplicating these controls within a separate hydrology management plan would improve their effectiveness.
WC1-258	Hydrology, Flood Risk and Drainage	LFA Position Statement on Hydrology, Flood Risk and Drainage Matters	Hydrology-Focused Review 26.9. The Deadline 3 submissions demonstrate a more developed understanding of the mechanisms by which the Scheme could influence surface water runoff, flood risk, erosion risk and drainage pathways. In particular, the Applicant's updated material places greater emphasis on soil condition, vegetation cover, compaction control, erosion prevention, watercourse buffers, groundwater sensitivity and construction-phase management as key controls for maintaining hydrological performance across the Site.	The Applicant welcomes the LLFA's recognition that the Deadline 3 submissions provide a more developed understanding of the mechanisms relevant to runoff, flood risk, erosion and drainage pathways. The Applicant notes that the importance of soil condition, vegetation cover, compaction management, erosion prevention, watercourse protection and construction-phase controls has been a consistent part of the assessment approach. The later submissions provide further detail on how those mechanisms are to be managed and verified in practice. The relevant controls are distributed across the site-specific FRA and Drainage Strategies [REP4-023 to REP4-035], the Outline CEMP [REP4-

Reference	Theme	Issue	Comments	Applicant's Response
				049], the Outline SRMP [REP4-053], the Outline LEMP [REP3-100] and the Outline OEMP [REP4-051]. Together, these documents address construction and operational risks, including compaction, vegetation failure, erosion, runoff concentration, watercourse protection and the need for remedial action where monitoring identifies an issue. The Applicant therefore considers that the Deadline 3 material clarifies and strengthens the existing assessment framework rather than representing a change in the underlying hydrological approach.
WC1-259	Hydrology, Flood Risk and Drainage	LFA Position Statement on Hydrology, Flood Risk and Drainage Matters	26.10. The Ecology and Biodiversity documentation is relevant to the LLFA only insofar as it provides commitments relating to vegetation establishment, habitat maintenance and long-term land management. From a flood risk perspective, these matters are important because vegetation condition can influence infiltration, surface roughness, runoff velocity, erosion resistance and the potential for concentrated flow paths	The Applicant agrees that vegetation condition is relevant to hydrological performance, particularly where vegetation beneath and between panel rows contributes to surface roughness, erosion resistance and the slowing of overland flow. Vegetation establishment and long-term habitat management are addressed through ES Chapter 9: Ecology and

Reference	Theme	Issue	Comments	Applicant's Response
			to develop beneath or between panel arrays. This is considered within ES Volume 1 Chapter 9 Ecology and Biodiversity.	Biodiversity [REP4-010] and the Outline LEMP [REP3-100] . Soil condition, ponding and vegetation failure within the Solar PV Sites are also addressed through the Outline SRMP [REP4-053] , which requires operational monitoring and further investigation where these issues are identified.
WC1-260	Hydrology, Flood Risk and Drainage	LFA Position Statement on Hydrology, Flood Risk and Drainage Matters	26.11. The Soils and Agriculture chapter is directly relevant to hydrological performance because it addresses soil resources, soil structure, compaction risk and restoration measures. The LLFA considers these matters central to runoff management because soil permeability and compaction condition influence infiltration capacity, runoff generation, erosion susceptibility and the likelihood of channelisation. These matters are considered within ES Volume 1 Chapter 17 Soils and Agriculture.	The Applicant notes this comment.
WC1-261	Hydrology, Flood Risk and Drainage	LFA Position Statement on Hydrology, Flood Risk and	26.12. The Lime Down A-E desk studies provide important baseline hydrological and hydrogeological context. They identify relevant features including	The Applicant notes this comment.

Reference	Theme	Issue	Comments	Applicant's Response
		Drainage Matters	topography, soils, superficial deposits, bedrock aquifers, Source Protection Zones, groundwater vulnerability, ponds, streams, watercourses, flood zones and groundwater flood susceptibility. These matters are relevant to the LLFA because they inform understanding of existing flow pathways and sensitive receptors. These matters are addressed in the Lime Down A Desk Study, Lime Down B Desk Study, Lime Down C Desk Study, Lime Down D Desk Study and Lime Down E Desk Study.	
WC1-262	Hydrology, Flood Risk and Drainage	LFA Position Statement on Hydrology, Flood Risk and Drainage Matters	26.13. For Lime Down C in particular, the LLFA notes the presence of multiple watercourses, ponds and drainage features, areas of Flood Zone 2 and 3 associated with watercourses, high groundwater vulnerability, Source Protection Zone status, Principal and Secondary A aquifers, and nearby private water supply abstractions; these matters reinforce the need for site-specific hydrological controls, construction-phase pollution prevention, groundwater protection and monitoring.	The Applicant agrees that Lime Down C contains a range of hydrological and hydrogeological sensitivities that require a site-specific response. These constraints are not considered through the desk study alone. They are assessed through the separate FRA and Drainage Strategies for Lime Down C1 [REP4-027] and Lime Down C2 [REP4-029], which identify the relevant watercourses, flood zones, surface water flow routes and drainage

Reference	Theme	Issue	Comments	Applicant's Response
				requirements for each part of Lime Down C. Construction-phase pollution prevention, sediment control and water management are addressed through the Outline CEMP [REP4-049]. Groundwater and private water supply risks are assessed through ES Chapter 19: Ground Conditions [REP3-023] and the relevant Lime Down C desk study, with detailed controls to be developed having regard to the final design and construction methodology. The Applicant therefore agrees that site-specific controls are required and considers that the submitted assessment and management framework provides for them.
WC1-263	Hydrology, Flood Risk and Drainage	LFA Position Statement on Hydrology, Flood Risk and Drainage Matters	26.14. The Lime Down D Desk Study is particularly relevant from an LLFA perspective because it identifies Gauze Brook, associated unnamed watercourses, areas of Flood Zone 3 and areas of groundwater flood susceptibility. This information is relevant to understanding runoff pathways, floodplain function and the	The Applicant agrees that Gauze Brook and the associated floodplain and drainage network are key hydrological features at Lime Down D. These matters are assessed through the FRA and Drainage Strategy for Lime Down D [REP4-031] and the Hydraulic Modelling Report [REP3-131], which

Reference	Theme	Issue	Comments	Applicant's Response
			need to ensure that construction and operational activities do not increase flood risk or adversely affect watercourse behaviour. These matters are addressed in ES Volume 3 Appendix 19-4 Lime Down D Desk Study.	consider flood risk from Gauze Brook, floodplain interaction and the potential effect of the Scheme on flood levels and flows. The layout and drainage principles seek to maintain floodplain function, avoid inappropriate siting of sensitive infrastructure and prevent an increase in flood risk. Construction-phase runoff, sediment and pollution risks are addressed through the Outline CEMP [REP4-049], with detailed drainage design to reflect the final layout and local flow routes. The Applicant is also separately investigating potential NFM and flood alleviation opportunities at Lime Down D as a community benefit. That work is additional to, and not relied upon for, the mitigation or acceptability of the Scheme.
WC1-264	Hydrology, Flood Risk and Drainage	LFA Position Statement on Hydrology, Flood Risk and	26.15. The Lime Down E Desk Study is also relevant because it identifies Gabriel's Well, associated tributaries, alluvium, Flood Zone 3 extents, groundwater flood susceptibility,	The Applicant agrees that Lime Down E contains a combination of fluvial, surface water and groundwater sensitivities that require a site-specific response.

Reference	Theme	Issue	Comments	Applicant's Response
		Drainage Matters	Secondary A aquifers and Source Protection Zone 1c status. These features indicate that runoff management, compaction control, sediment control and construction-phase drainage measures are important to avoid adverse effects on watercourses and groundwater receptors. These matters are addressed in ES Volume 3 Appendix 19-5 Lime Down E Desk Study.	These matters are assessed through the FRA and Drainage Strategies for Lime Down E1 [REP4-033] and Lime Down E2 [REP4-035], together with the Lime Down E2 Hydraulic Modelling Report [REP4-089]. The hydraulic modelling provides the detailed assessment of Gabriel's Well / Rodbourne Brook, including local flood behaviour, flood extents and interaction with the proposed development. The assessments identify the relevant flood extents, flow routes and drainage principles and inform the siting and protection of Scheme infrastructure. Construction-phase drainage, sediment and pollution controls are addressed through the Outline CEMP [REP4-049]. Soil condition and compaction are addressed through the Outline SRMP [REP4-053], while groundwater protection measures are informed by ES Chapter 19: Ground Conditions [REP3-023] and the Lime Down E desk study. The Applicant therefore agrees that these features require site-specific

Reference	Theme	Issue	Comments	Applicant's Response
				controls and considers that they are addressed through the submitted assessment, hydraulic modelling and management framework.
WC1-265	Hydrology, Flood Risk and Drainage	LFA Position Statement on Hydrology, Flood Risk and Drainage Matters	26.16. The landscape and Cotswolds National Landscape material is relevant to the LLFA only where it relates to vegetation establishment, land management, surface roughness, erosion control and the long-term maintenance of vegetated buffers. The LLFA does not rely on those documents for landscape judgement but recognises that landscape planting and long-term vegetation management may also perform hydrological functions where they contribute to runoff slowing, infiltration, erosion resistance and watercourse buffer performance. These matters are considered in ES Volume 3 Appendix 8-1 and ES Volume 3 Appendix 8-6.	The Applicant notes that landscape planting and vegetated buffers may also provide hydrological benefits where they increase surface roughness, reduce erosion or help slow runoff. These benefits are ancillary to the primary landscape and ecological purposes of the planting and buffers. Their establishment and long-term management are addressed through the Outline LEMP [REP3-100], while the drainage and watercourse protection functions relied upon by the hydrology assessment are addressed through the site-specific FRA and Drainage Strategies [REP4-023 to REP4-035] and the relevant construction and operational management plans. The Outline LEMP [REP3-100] sets out the proposed ongoing General Management Prescriptions for all

Reference	Theme	Issue	Comments	Applicant's Response
				vegetation within the order Limits. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, which would be required to be substantially in accordance with the Outline LEMP [REP3-100] , is secured through Requirement 7 in Schedule 2 of the Draft Development Consent Order [REP4-004] .
WC1-266	Hydrology, Flood Risk and Drainage	LFA Position Statement on Hydrology, Flood Risk and Drainage Matters	26.17. The revised Outline Construction Traffic Management Plan is relevant to hydrology because construction access formation, haul roads, temporary surfacing, vehicle movements, soil disturbance and compaction can alter runoff pathways and increase sediment mobilisation if not properly managed. The CTMP provides an improved governance framework for monitoring, reporting, 57 responsibilities, complaints handling and compliance. However, the LLFA considers that equivalent clarity is still required for temporary drainage, runoff control, sediment management	The Applicant agrees that construction access, temporary roads, vehicle movements and soil disturbance can affect runoff pathways and sediment mobilisation if not properly managed. The Outline CTMP [REP4-057] controls construction traffic movements and access arrangements. The hydrological effects of those activities are addressed through the Outline CEMP [REP4-049] , which requires construction drainage, runoff and pollution control measures to be developed for the relevant phase and location.

Reference	Theme	Issue	Comments	Applicant's Response
			and construction-phase flood response. These matters are set out in the Outline Construction Traffic Management Plan.	Soil compaction prevention, inspection and remediation are addressed through the Outline SRMP [REP4-053] , while the site-specific FRA and Drainage Strategies [REP4-023 to REP4-035] identify the drainage principles and exceedance routes that must be reflected in the detailed design. The Applicant therefore considers that temporary drainage, runoff control, sediment management and construction-phase flood response are addressed through the appropriate subject-specific documents rather than the CTMP alone.
WC1-267	Hydrology, Flood Risk and Drainage	LFA Position Statement on Hydrology, Flood Risk and Drainage Matters	26.18. The LLFA considers that the Deadline 3 evidence now provides a stronger basis for understanding how the development seeks to manage runoff and avoid adverse flood risk effects. However, the residual hydrology concerns relate to whether the relied-upon measures – vegetation establishment, soil condition protection, compaction remediation, erosion management, construction-phase drainage controls and long-term	The Applicant welcomes the LLFA's recognition that the Deadline 3 evidence provides a stronger basis for understanding how runoff and flood risk will be managed. The Applicant considers that the relied-upon measures are now sufficiently defined at the outline stage. Vegetation establishment and management are addressed through the Outline LEMP [REP3-100] ; soil protection, compaction

Reference	Theme	Issue	Comments	Applicant's Response
			monitoring – are sufficiently defined, governed and verified throughout construction and operation.	monitoring, remediation and verification through the Outline SRMP [REP4-053] ; and construction-phase drainage, erosion, sediment and pollution controls through the Outline CEMP [REP4-049] . The detailed versions of these plans will translate those controls into phase-specific and location-specific procedures, responsibilities and monitoring arrangements once the final design and construction methodology are known. The Applicant considers this to be the appropriate level of detail at this stage.
WC1-268	Hydrology, Flood Risk and Drainage	LFA Position Statement on Hydrology, Flood Risk and Drainage Matters	Matters Now Considered Resolved 26.19. The LLFA considers that substantial progress has been made on a number of hydrology-related issues raised earlier in the examination.	The Applicant welcomes the LLFA's recognition that substantial progress has been made.
WC1-269	Hydrology, Flood Risk and Drainage	LFA Position Statement on Hydrology, Flood Risk and	26.20. First, the Applicant has demonstrated an intention to retain existing ground levels across much of the Site and avoid unnecessary regrading. From a hydrology	The Applicant welcomes the LLFA's recognition of the hydrological benefit of retaining existing ground levels and drainage patterns where practicable.

Reference	Theme	Issue	Comments	Applicant's Response
		Drainage Matters	perspective, this reduces uncertainty regarding the creation of new artificial overland flow routes and supports the retention of existing drainage patterns where appropriate.	The Scheme has been designed to avoid unnecessary regrading across the Solar PV Sites. Any localised earthworks required for formal infrastructure will be addressed through the relevant site-specific drainage design so that existing flow routes are maintained or appropriately managed.
WC1-270	Hydrology, Flood Risk and Drainage	LFA Position Statement on Hydrology, Flood Risk and Drainage Matters	26.21. Second, the Applicant has now more clearly recognised that soil condition and compaction are important factors influencing runoff generation. Earlier LLFA concerns related to whether compaction risks had been sufficiently recognised as a hydrological issue. The updated Soils and Agriculture material addresses soil structure, compaction and restoration more directly.	The Applicant welcomes the LLFA's recognition that soil condition and compaction are relevant hydrological considerations. The Applicant notes that compaction has consistently been identified as a principal mechanism by which construction activity could affect infiltration, runoff generation and the potential concentration of overland flow. The Applicant's assessment does not rely on the presence of solar panels themselves as the primary cause of increased runoff. Instead, the key risk is damage to soil structure through trafficking, handling or working in unsuitable ground conditions, particularly where this could reduce

Reference	Theme	Issue	Comments	Applicant's Response
				infiltration or create preferential flow paths. This mechanism is addressed through ES Chapter 11: Hydrology, Flood Risk and Drainage [REP4-012], ES Chapter 17: Soils and Agriculture [REP3-021] and the updated Outline SRMP [EN010168/APP/7.15] (Revision 4),. The Outline SRMP requires avoidance of unnecessary trafficking, use of designated access and haul routes, soil handling only in suitable moisture and weather conditions, and monitoring of ground conditions throughout construction. It also provides for inspection following pile installation and before panels are fixed, including visual assessment and hand-dug pits using VESS to identify the depth and severity of compaction. Where compaction is identified, remedial action must be undertaken while the affected area remains accessible, with further inspection used to verify that the treatment has addressed the soil to the required depth. During operation, visual monitoring will

Reference	Theme	Issue	Comments	Applicant's Response
				continue beneath and between the panels, with ponding, vegetation failure or other indicators of impaired soil condition triggering further investigation and remedial action by a suitably qualified soil practitioner. The Applicant therefore considers that soil compaction is already fully integrated into the hydrological assessment and management framework, rather than being treated solely as an agricultural issue.
WC1-271	Hydrology, Flood Risk and Drainage	LFA Position Statement on Hydrology, Flood Risk and Drainage Matters	26.22. Third, the LLFA acknowledges that commitments relating to compaction avoidance and remediation are now incorporated within the wider management framework. Although further detail remains desirable regarding operational monitoring and verification, the principle that compaction requires management is no longer disputed.	The Applicant welcomes the LLFA's acknowledgement that the principle of compaction management is no longer disputed. The updated Outline SRMP [EN010168/APP/7.15] (Revision 4) now provides further detail on construction and operational monitoring, use of visual assessment and soil pits, remediation before panel installation where required, and subsequent verification of remedial measures.

Reference	Theme	Issue	Comments	Applicant's Response
WC1-272	Hydrology, Flood Risk and Drainage	LFA Position Statement on Hydrology, Flood Risk and Drainage Matters	26.23. Fourth, the ecological and landscape material demonstrates stronger commitments to vegetation establishment and long-term land management. From the LLFA's perspective, these commitments are relevant because well-established vegetation can support infiltration, reduce erosion and increase surface roughness.	The Applicant welcomes the LLFA's recognition of the stronger commitments to vegetation establishment and long-term land management. These measures are addressed through ES Chapter 9: Ecology and Biodiversity [REP4-010] and the Outline LEMP [REP3-100], with soil condition, ponding and vegetation failure also monitored through the Outline SRMP [REP4-053].
WC1-273	Hydrology, Flood Risk and Drainage	LFA Position Statement on Hydrology, Flood Risk and Drainage Matters	26.24. Fifth, the LLFA welcomes the greater consideration of watercourse buffers and natural flood management opportunities, particularly in the context of Lime Down D where Gauze Brook and associated Flood Zone 3 constraints are identified.	The Applicant welcomes the LLFA's recognition of the greater consideration given to watercourse buffers and NFM opportunities. Watercourse buffers have been applied on a receptor-specific basis, having regard to watercourse sensitivity, ecology and consenting requirements. These buffers are identified through the Scheme design and relevant ecological and drainage documentation and will be maintained through the detailed design and management plans. At Lime Down D, the Applicant is actively investigating potential NFM and

Reference	Theme	Issue	Comments	Applicant's Response
				flood alleviation opportunities associated with Gauze Brook. This work is being progressed as a potential community benefit in response to existing downstream flood concerns and is additional to the mitigation required to demonstrate the acceptability of the Scheme. It is not relied upon to address an identified adverse effect of the Scheme or to satisfy the flood risk assessment. An update on this work will be provided at Deadline 5. The investigation includes consideration of whether proportionate catchment-based measures could provide meaningful downstream betterment, subject to hydraulic evidence, feasibility, land availability and agreement with the relevant authorities and landowners. The work should therefore remain clearly distinguished from the Scheme's required flood risk mitigation and drainage controls.
WC1-274	Hydrology, Flood Risk and Drainage	LFA Position Statement on Hydrology, Flood Risk and	26.25. Finally, firewater containment principles have developed to a stage where they no longer represent a principal unresolved LLFA concern,	The Applicant welcomes the LLFA's confirmation that firewater containment

Reference	Theme	Issue	Comments	Applicant's Response
		Drainage Matters	subject to detailed design and implementation through the relevant management controls.	is no longer a principal unresolved matter. The relevant principles are set out in the Outline Battery Safety Management Plan [REP3-106], the BESS Firewater Containment Strategy [REP3-118], the Substation Firewater Containment Strategy [REP3-120] and the relevant site-specific FRA and Drainage Strategies [REP4-023 to REP4-035]. These establish the requirements for lined drainage, isolation, containment and detailed design of the drainage and firewater systems.
WC1-275	Hydrology, Flood Risk and Drainage	LFA Position Statement on Hydrology, Flood Risk and Drainage Matters	Matters Considered Substantially Narrowed 26.26. Several matters remain under discussion but have been substantially narrowed.	The Applicant notes this comment.
WC1-276	Hydrology, Flood Risk and Drainage	LFA Position Statement on Hydrology, Flood Risk and	26.27. Hydraulic modelling requirements were a prominent issue earlier in the examination. Following review of further evidence and discussions with the Applicant, the LLFA no longer considers	The Applicant welcomes the LLFA's confirmation that it is no longer seeking additional scheme-wide hydraulic modelling.

Reference	Theme	Issue	Comments	Applicant's Response
		Drainage Matters	additional scheme-wide hydraulic modelling to be the most productive means of resolving residual uncertainty.	This is consistent with the Applicant's position that blanket modelling of all panel areas would not provide a reliable or proportionate means of quantifying changes in runoff from agricultural land to managed grassland beneath solar panels. Targeted hydraulic modelling has nevertheless been undertaken where there is a defined fluvial flood risk issue, including Gauze Brook at Lime Down D and Gabriel's Well / Rodbourne Brook at Lime Down E2. The most recent hydraulic modelling note submitted at the last deadline provides the detailed assessment for Lime Down E2 and supplements the site-specific FRA and Drainage Strategy. This targeted approach addresses the locations where hydraulic modelling is technically justified, without extending modelling unnecessarily across the wider Scheme.
WC1-277	Hydrology, Flood Risk and Drainage	LFA Position Statement on Hydrology, Flood Risk and	26.28. The Applicant has provided a clearer explanation of the relationship between runoff generation, vegetation cover, soil condition, compaction control and erosion management. This has	The Applicant welcomes the LLFA's recognition that the relationship between runoff generation, vegetation cover, soil condition, compaction and erosion

Reference	Theme	Issue	Comments	Applicant's Response
		Drainage Matters	improved the LLFA's understanding of the conceptual basis of the flood risk strategy.	management has now been clearly explained. The Applicant's position is that these mechanisms, rather than the panels themselves acting as a connected impermeable surface, are the principal controls on runoff from panel areas. The relevant assessment is set out in ES Chapter 11: Hydrology, Flood Risk and Drainage [REP4-012], supported by the site-specific FRA and Drainage Strategies [REP4-023 to REP4-035] and the Applicant's Response to the Wiltshire Council LLFA Note on Hydraulic Modelling Requirements [REP2-045]. The corresponding management measures are set out in the Outline SRMP [REP4-053], Outline CEMP [REP4-049], Outline LEMP [REP3-100] and Outline OEMP [REP4-051].
WC1-278	Hydrology, Flood Risk and Drainage	LFA Position Statement on Hydrology, Flood Risk and	26.29. Concerns relating to whether solar panels alone would materially alter runoff behaviour have also reduced in significance. The LLFA's focus is now on the condition of the land beneath and	The Applicant welcomes the LLFA's confirmation that concerns regarding whether the Solar PV Panels alone would materially alter runoff behaviour have reduced in significance.

Reference	Theme	Issue	Comments	Applicant's Response
		Drainage Matters	around the panels, including vegetation cover, soil structure, erosion control and long-term maintenance.	This is consistent with the Applicant's assessment that the Solar PV Panels would not form a connected impermeable drainage catchment. Rainfall would continue to reach the ground beneath and between the panel rows. Although rainfall may be redistributed locally at panel drip lines, this does not in itself result in a material increase in runoff leaving the field or an increase in downstream flood risk. The Applicant agrees that the relevant focus is therefore the condition and hydraulic functionality of the land beneath and around the panels, including soil structure, vegetation cover, erosion resistance and the avoidance of preferential runoff pathways. These matters are assessed in ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP4-012] and explained further in the Applicant's Response to Wiltshire Council Lead Local Flood Authority Note on Hydraulic Modelling Requirements [REP2-045].

Reference	Theme	Issue	Comments	Applicant's Response
				The prevention, inspection and remediation of soil compaction are addressed through the Outline SRMP [REP4-053] . Vegetation establishment and maintenance are addressed through ES Volume 1, Chapter 9: Ecology and Biodiversity [REP4-010] , with operational monitoring and corrective action also addressed through the Outline Operational Environmental Management Plan (Rev 4) [REP4-051] .
WC1-279	Hydrology, Flood Risk and Drainage	LFA Position Statement on Hydrology, Flood Risk and Drainage Matters	26.30. The residual concerns therefore now relate primarily to implementation, monitoring, governance and verification, rather than to the overall assessment methodology.	The Applicant agrees that the residual matters now relate primarily to the implementation, monitoring and verification of the identified controls, rather than the overall hydrological assessment methodology. The relevant controls are addressed through the management plan appropriate to each mechanism. Construction-phase runoff, temporary drainage, erosion, sediment and pollution control are addressed through the Outline CEMP [REP4-049]. Soil condition, compaction inspection, remediation and verification are

Reference	Theme	Issue	Comments	Applicant's Response
				addressed through the Outline SRMP [REP4-049]. Operational monitoring and corrective action are addressed through the Outline OEMP [REP4-051]. The detailed versions of those plans will translate the outline controls into phase-specific and location-specific procedures, including roles and responsibilities, inspection and monitoring requirements, intervention triggers, recording procedures and corrective actions. The Applicant considers this to provide the necessary governance without duplicating the same controls within a separate hydrology management plan.
WC1-280	Hydrology, Flood Risk and Drainage	LFA Position Statement on Hydrology, Flood Risk and Drainage Matters	Updated LLFA Position on Hydraulic Modelling and Residual Hydrology Matters Why the LLFA Is Not Seeking Additional Scheme-Wide Hydraulic Modelling 26.31. The LLFA's position has evolved through the examination process. Earlier concerns reflected uncertainty regarding	The Applicant notes the LLFA's updated position. The Applicant has consistently maintained that a proportionate assessment should distinguish between locations where detailed hydraulic modelling is technically justified and wider panel areas where runoff behaviour is principally governed by soil

Reference	Theme	Issue	Comments	Applicant's Response
			the evidence available to demonstrate that the development would not increase flood risk.	condition, vegetation, compaction and land management. The submitted assessment therefore combines site-specific FRA and Drainage Strategies, targeted hydraulic modelling at the principal fluvial flood risk locations, and management controls addressing construction runoff, soil condition and vegetation performance. The basis for this approach is set out in ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP4-012] , the Applicant's Response to Wiltshire Council Lead Local Flood Authority Note on Hydraulic Modelling Requirements [REP2-045] and the Hydrology, Flood Risk and Drainage Response to LLFA Comment WC1-053 Raised in Deadline 2 Submissions [REP4-083] .
WC1-281	Hydrology, Flood Risk and Drainage	LFA Position Statement on Hydrology, Flood Risk and Drainage Matters	26.32. Following detailed consideration of the Deadline 3 material, the LLFA accepts that there are practical limitations associated with attempting to undertake blanket hydraulic modelling across extensive solar panelled areas. Runoff behaviour is influenced by	The Applicant welcomes the LLFA's recognition of the practical and technical limitations associated with blanket hydraulic modelling across extensive Solar PV panel areas.

Reference	Theme	Issue	Comments	Applicant's Response
			vegetation condition, soil structure, soil compaction, erosion processes and land management practices.	The Applicant agrees that runoff from these areas is governed by the interaction of soil structure, soil moisture, vegetation condition, compaction, surface roughness, erosion and land management. These factors vary spatially and over time and cannot be represented reliably through a single generic set of hydraulic model parameters for panelled areas. The Applicant has therefore undertaken targeted hydraulic modelling where defined fluvial flood risk circumstances warrant it. Gauze Brook at Lime Down D is assessed through the Hydraulic Modelling Report [REP3-131]. Gabriel's Well and the associated watercourse network at Lime Down E2 are assessed through the Lime Down E2 - Hydraulic Modelling Report [REP4-089]. These reports provide detailed assessment at the locations where hydraulic modelling can materially inform flood risk, floodplain interaction and the detailed design. The Applicant considers that this targeted approach provides a more

Reference	Theme	Issue	Comments	Applicant's Response
				technically meaningful assessment than attempting to model all Solar PV panel areas using uncertain or unvalidated proxy assumptions.
WC1-282	Hydrology, Flood Risk and Drainage	LFA Position Statement on Hydrology, Flood Risk and Drainage Matters	26.33. The Applicant has explained that no recognised methodology currently exists that would reliably quantify runoff differences between agricultural land and managed grassland beneath solar arrays. The LLFA considers this explanation reasonable, particularly given that the dominant residual risks relate to how land condition will be maintained over time.	The Applicant welcomes the LLFA's acceptance that no recognised methodology has been identified that would reliably quantify runoff differences between agricultural land and managed grassland beneath Solar PV arrays. Agricultural land does not provide a fixed or uniform baseline condition. Runoff response varies according to crop cover, cultivation, seasonal bare ground, antecedent moisture, soil structure, local compaction and land management. The operational Scheme would instead provide managed vegetation beneath and between the panels, with controls to protect and restore soil structure. The appropriate assessment is therefore to identify the mechanisms capable of increasing runoff and ensure that those mechanisms are avoided, monitored and remediated. This approach is set

Reference	Theme	Issue	Comments	Applicant's Response
				out in ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP4-012] and the Applicant's Response to Wiltshire Council Lead Local Flood Authority Note on Hydraulic Modelling Requirements [REP2-045]. The Outline SRMP [REP4-053] addresses the prevention, identification, remediation and verification of soil compaction during construction and operation. The Outline OEMP [REP4-051] provides the wider operational framework for monitoring and corrective action.
WC1-283	Hydrology, Flood Risk and Drainage	LFA Position Statement on Hydrology, Flood Risk and Drainage Matters	26.34. Consequently, the LLFA no longer considers that further scheme-wide hydraulic modelling would materially improve understanding of the principal residual risks. Instead, the LLFA considers that attention should focus on the measures relied upon by the Applicant to manage hydrological performance and, critically, how those measures will be monitored, maintained	The Applicant welcomes the LLFA's confirmation that further scheme-wide hydraulic modelling would not materially improve understanding of the principal residual risks. The Applicant agrees that the appropriate focus is the continued hydraulic functionality of the land, including the maintenance of soil structure, vegetation cover, erosion resistance and existing runoff pathways.

Reference	Theme	Issue	Comments	Applicant's Response
			and verified throughout the operational lifetime of the development.	These matters are addressed through the Outline SRMP [REP4-053], the Outline CEMP [REP4-049], the Outline OEMP [REP4-051] and ES Volume 1, Chapter 9: Ecology and Biodiversity [REP4-010]. The detailed management plans will define the phase-specific and location-specific inspection procedures, responsibilities, monitoring requirements, intervention triggers and corrective actions necessary to maintain those functions throughout construction and operation. Targeted hydraulic modelling has also been completed at the principal fluvial flood risk locations through the Hydraulic Modelling Report [REP3-131] for Gauze Brook at Lime Down D and the Lime Down E2 - Hydraulic Modelling Report [REP4-089] for Gabriel's Well and the associated watercourse network at Lime Down E2. This provides detailed hydraulic evidence where it is technically justified, while avoiding unreliable blanket

Reference	Theme	Issue	Comments	Applicant's Response
				modelling of the wider Solar PV panel areas.
WC1-284	Hydrology, Flood Risk and Drainage	LFA Position Statement on Hydrology, Flood Risk and Drainage Matters	Core Hydrology Matters Remaining 26.35. Although the LLFA is no longer seeking additional scheme-wide hydraulic modelling, this does not mean that all hydrology matters are resolved.	The Applicant notes that, although the LLFA is no longer seeking additional scheme-wide hydraulic modelling, a number of hydrology matters remain under discussion through the SoCG process.
WC1-285	Hydrology, Flood Risk and Drainage	LFA Position Statement on Hydrology, Flood Risk and Drainage Matters	26.36. The Deadline 3 evidence demonstrates that the Applicant has now identified the relevant hydrological mechanisms. However, the remaining question is whether those mechanisms are sufficiently secured, monitored and verified through the management framework.	The Applicant agrees that the remaining discussion relates principally to the implementation, monitoring and verification of the identified hydrological controls. Those mechanisms are assessed through ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP4-012] and the site-specific Flood Risk Assessment and Drainage Strategy appendices [REP4-023 to REP4-035] . The corresponding controls are then carried through the relevant management plans, including the Outline CEMP [REP4-049] , Outline OEMP [REP4-051] and Outline SRMP [REP4-053].

Reference	Theme	Issue	Comments	Applicant's Response
				The Applicant considers that the outstanding points are capable of resolution through clarification of how these documents operate together and, where appropriate, targeted refinements to the relevant management plans.
WC1-286	Hydrology, Flood Risk and Drainage	LFA Position Statement on Hydrology, Flood Risk and Drainage Matters	26.37. The LLFA considers that the core hydrology matters remaining are: 1) whether existing runoff pathways will be retained and protected; 2) whether vegetation beneath and around panels will provide sufficient surface roughness, infiltration support and erosion resistance; 3) whether soil structure and permeability will be maintained during construction and operation; 4) whether soil compaction will be identified, remediated and verified; 5) whether drip-line erosion, rilling or channelisation will be monitored and addressed; 6) whether temporary drainage and sediment control measures during construction will be sufficiently robust;	The Applicant responds to the nine matters identified by the LLFA as follows: 1. Existing runoff pathways: Existing ground levels and principal runoff pathways will be retained where practicable. Where infrastructure intersects a flow route, the detailed drainage design will maintain hydraulic connectivity through appropriate cross-drainage or conveyance measures. These principles are set out in the site-specific Flood Risk Assessment and Drainage Strategy appendices [REP4-23 to REP4-035] and will be developed through the drainage schemes required under

Reference	Theme	Issue	Comments	Applicant's Response
			7) whether watercourse buffers and low-lying drainage pathways will be protected in practice; 8) whether site-specific hydrological sensitivities identified in the Lime Down A-E desk studies are translated into monitoring and management controls; and 9) whether monitoring arrangements include clear triggers, responsibilities, reporting and corrective actions.	Requirement 11 of the Draft DCO [REP4-004]. 2. Vegetation beneath and around panels: Managed vegetation will be established beneath and between the panel rows. Its role is to provide ground cover, surface roughness and erosion resistance, rather than to act as a formal drainage system. Vegetation establishment and maintenance are addressed through ES Volume 1, Chapter 9: Ecology and Biodiversity [REP4-010] and the relevant landscape and ecological management measures. Soil condition, ponding and vegetation failure are also subject to operational monitoring through the Outline SRMP [REP4-053]. 3. Soil structure and permeability: The Outline SRMP [REP4-053], requires the avoidance of unnecessary trafficking, use of designated access routes, soil handling only

Reference	Theme	Issue	Comments	Applicant's Response
				in suitable moisture conditions and monitoring of ground condition throughout construction and operation. 4. Compaction identification, remediation and verification: The updated Outline SRMP [EN010168/APP/7.15] (Revision 4) provides for visual inspection and hand-dug pits using VESS following pile installation and before panel fixing. Where compaction is identified, remediation must be undertaken while the area remains accessible, with further inspection used to verify that the affected depth has been treated. 5. Drip-line erosion, rilling and channelisation: These matters will be identified through visual monitoring of the panel areas. Evidence of erosion, ponding, vegetation failure or concentrated flow will trigger further investigation and appropriate remedial action under the

Reference	Theme	Issue	Comments	Applicant's Response
				Outline SRMP) [REP4-053], and Outline OEMP [REP4-051]. 6. Temporary drainage and sediment control: Construction-phase drainage, runoff, erosion, sediment and pollution controls are addressed through the Outline CEMP [REP4-049]. The detailed CEMP will define the temporary measures required for each phase and location before construction commences. 7. Watercourse buffers and low-lying drainage pathways: Watercourse buffers have been applied on a receptor-specific basis having regard to watercourse sensitivity, ecology and consenting requirements. Low-lying corridors and drainage pathways are identified through the site-specific Flood Risk Assessment and Drainage Strategy appendices [REP4-023 to REP4-035] and will be reflected in detailed design.

Reference	Theme	Issue	Comments	Applicant's Response
				8. Site-specific sensitivities: Separate assessments have been prepared for Lime Down A to E and the Cable Route Corridor. More sensitive areas have been subject to targeted hydraulic assessment, including Gauze Brook through the Hydraulic Modelling Report [REP3-131] and Gabriel's Well / Rodbourne Brook through the Lime Down E2 Hydraulic Modelling Report [REP4-089]. 9. Governance and corrective action: Roles, monitoring, recording and corrective actions are provided through the relevant subject-specific management plans. The detailed versions will define the responsible parties, inspection arrangements, intervention triggers, reporting procedures and remedial actions appropriate to each phase and location. The Applicant therefore considers that each of the matters identified by the

Reference	Theme	Issue	Comments	Applicant's Response
				LLFA is addressed within the submitted assessment and management framework, with further detail appropriately provided through the secured detailed plans.
WC1-287	Hydrology, Flood Risk and Drainage	LFA Position Statement on Hydrology, Flood Risk and Drainage Matters	26.38. These matters are hydrological in nature. They are not simply ecological, agricultural or construction-management issues. The Applicant's approach relies upon the long-term functioning of vegetation, soils, drainage pathways, watercourse buffers and management controls to avoid increased runoff, erosion and flood risk.	The Applicant agrees that soil condition, vegetation, drainage pathways, watercourse buffers and construction controls are relevant to hydrological performance and are not solely ecological, agricultural or construction-management matters. The Scheme's approach deliberately links the hydrological assessment in ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP4-012] with the subject-specific controls contained in the Outline CEMP [REP4-049], Outline OEMP [REP4-051] and OutlineSRMP [REP4-053]. The Applicant does not, however, consider that these controls need to be duplicated within a separate hydrology management plan. Their effectiveness depends on clear implementation within

Reference	Theme	Issue	Comments	Applicant's Response
				the document governing the relevant activity.
WC1-288	Hydrology, Flood Risk and Drainage	LFA Position Statement on Hydrology, Flood Risk and Drainage Matters	26.39. Accordingly, the LLFA considers that the remaining matters are best addressed through targeted amendments to the management plans and supporting documentation, rather than through further broad-scale hydraulic modelling.	The Applicant agrees that any remaining matters are more appropriately addressed through targeted clarification or refinement of the relevant management plans and supporting documents than through further broad-scale hydraulic modelling. The Applicant will continue to engage with the LLFA through the SoCG process to identify any specific residual wording required.
WC1-289	Hydrology, Flood Risk and Drainage	LFA Position Statement on Hydrology, Flood Risk and Drainage Matters	Updated LLFA Position on Flood Risk Assessment Matters 26.40. The LLFA has reviewed ES Volume 1 Chapter 11: Hydrology, Flood Risk and Drainage, together with the supporting Flood Risk Assessment and Drainage Strategy appendices, insofar as they relate to flood risk from fluvial, surface water, groundwater, artificial and drainage sources.	The Applicant notes the scope of the LLFA's review.

Reference	Theme	Issue	Comments	Applicant's Response
WC1-290	Hydrology, Flood Risk and Drainage	LFA Position Statement on Hydrology, Flood Risk and Drainage Matters	26.41. The LLFA notes that the Applicant's assessment uses the Environment Agency Flood Map for Planning, updated surface water flood risk mapping, LiDAR- 60 derived topographic information and site-specific assessment to inform the baseline flood risk position. The LLFA also notes that site-specific hydraulic modelling has been undertaken for Gauze Brook at Lime Down D, where Flood Zone 3 and overland flow risk are more prominent.	The Applicant notes the LLFA's acknowledgement of the baseline information and assessment methods used. In addition to the modelling undertaken for Gauze Brook at Lime Down D through the Hydraulic Modelling Report [REP3-131], targeted hydraulic modelling has also been completed for Gabriel's Well / Rodbourne Brook at Lime Down E2 and reported in the Lime Down E2 Hydraulic Modelling Report [REP4-089]. The Applicant considers that this targeted approach provides detailed hydraulic evidence at the locations where fluvial flood risk and interaction with the Scheme require it.
WC1-291	Hydrology, Flood Risk and Drainage	LFA Position Statement on Hydrology, Flood Risk and Drainage Matters	26.42. The LLFA acknowledges that the Applicant has sought to apply a sequential design approach by locating more flood-sensitive infrastructure, including the BESS and substations, within areas identified as being at low probability of flooding where practicable. The LLFA also notes the Applicant's	The Applicant welcomes the LLFA's recognition of the sequential design approach and the drainage principles incorporated into the Scheme. The BESS and substations have been located in Flood Zone 1. Solar PV Panels within Flood Zones 2 and 3 are limited to locations where the assessed

Reference	Theme	Issue	Comments	Applicant's Response
			design commitments relating to existing overland flow route preservation, permeable access tracks, watercourse buffers, flood-resilient electrical infrastructure and controlled drainage for formal infrastructure areas.	flood depths are below 1 m and the infrastructure can be designed to remain resilient. Existing ground levels and principal flow routes will be retained where practicable. Access tracks will remain permeable and generally follow existing levels, with cross-drainage provided where required. Formal impermeable areas will be positively drained, attenuated and discharged at controlled rates through the drainage schemes required under Requirement 11 of the Draft DCO [REP4-004]. These principles are set out in ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP4-012] and the site-specific Flood Risk Assessment and Drainage Strategy appendices [REP3-049 to REP3-063].
WC1-292	Hydrology, Flood Risk and Drainage	LFA Position Statement on Hydrology, Flood Risk and Drainage Matters	26.43. The LLFA further notes that climate change has been considered within the Applicant's assessment, including the application of rainfall and fluvial climate change allowances, and that SuDS features for formal drainage	The Applicant welcomes the LLFA's acknowledgement that climate change has been incorporated into the assessment. The applicable rainfall and fluvial climate change allowances are addressed in ES

Reference	Theme	Issue	Comments	Applicant's Response
			areas are proposed to manage the 1 in 100 year rainfall event plus climate change.	Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP4-012] and the site-specific Flood Risk Assessment and Drainage Strategy appendices [REP4-023 to REP4-035]. Formal drainage systems are designed to accommodate the 1 in 100 year rainfall event plus the applicable climate change allowance, with runoff attenuated and discharged at controlled rates. Detailed drainage schemes will be submitted for approval under Requirement 11 of the Draft DCO [REP4-004].
WC1-293	Hydrology, Flood Risk and Drainage	LFA Position Statement on Hydrology, Flood Risk and Drainage Matters	26.44. On the basis of the Deadline 3 material reviewed, the LLFA is not currently seeking further scheme-wide hydraulic modelling. The LLFA's remaining concerns do not principally relate to the mapping of flood extents or the prediction of flood levels across the wider Scheme. Rather, the LLFA's residual concerns relate to the long-term delivery, monitoring, maintenance and verification of the hydrological and drainage controls relied upon by the Applicant to ensure that flood risk is not	The Applicant welcomes the LLFA's confirmation that it is not seeking further scheme-wide hydraulic modelling and agrees that the remaining discussion relates principally to implementation and continued performance of the identified controls. Construction-phase controls are addressed through the Outline CEMP [REP4-049]. Operational monitoring and maintenance are addressed through the Outline OEMP [REP4-051]. Soil

Reference	Theme	Issue	Comments	Applicant's Response
			increased during construction, operation or decommissioning.	condition, compaction monitoring, remediation and verification are addressed through the Outline SRMP [REP4-053] . Decommissioning controls will be developed through the detailed Decommissioning Environmental Management Plan in accordance with the Outline Decommissioning Strategy [REP3-096] .
WC1-294	Hydrology, Flood Risk and Drainage	LFA Position Statement on Hydrology, Flood Risk and Drainage Matters	26.45. These controls include the protection of existing runoff pathways, maintenance of vegetation cover, soil compaction avoidance and remediation, erosion control, temporary drainage, sediment management, watercourse buffer protection and operational drainage maintenance. The LLFA therefore considers that the remaining flood risk and hydrology matters are capable of resolution through refinement of the relevant management plans and continued engagement through the Statement of Common Ground process.	The Applicant agrees that the identified controls are relevant to maintaining hydrological performance throughout the Scheme's lifetime. The Applicant considers that the updated management framework addresses these matters at the appropriate level for the outline stage. The detailed plans will translate the requirements into location-specific procedures, responsibilities, monitoring arrangements, intervention triggers and corrective actions once the final design and construction methodology are known.

Reference	Theme	Issue	Comments	Applicant's Response
				The Applicant welcomes the LLFA's view that these matters are capable of resolution through refinement of the relevant management plans and continued engagement through the SoCG process.
WC1-295	Hydrology, Flood Risk and Drainage	LFA Position Statement on Hydrology, Flood Risk and Drainage Matters	26.46. The LLFA also notes the more detailed Lime Down D / BESS Drainage Strategy, including the Applicant's position that infiltration is not feasible, that surface water discharge from the BESS Area would be restricted to 8.64 l/s, and that attenuation storage of approximately 6,494 m ³ is proposed for the 1 in 100 year plus 45% climate change rainfall event. The LLFA further notes the proposed use of lined drainage, automatic isolation valves and firewater containment measures for the BESS and substation areas, together with maintenance arrangements to be secured through the relevant operational management plans. These matters support the LLFA's view that the remaining issues relate to detailed design, maintenance, governance and verification.	The Applicant welcomes the LLFA's acknowledgement of the drainage and firewater containment principles for the Lime Down D BESS and substations. The drainage strategy is set out in ES Volume 3, Appendix 11-6: Flood Risk Assessment and Drainage Strategy, Lime Down D / BESS [REP4-031] . This confirms that infiltration is not proposed, that the BESS drainage discharge will be restricted to 8.64 l/s and that approximately 6,494 m ³ of attenuation is provided for the 1 in 100 year rainfall event plus 45% climate change. Firewater and contaminated runoff containment are addressed through the Outline Battery Safety Management Plan [REP3-106], BESS Firewater Containment Strategy [REP3-118] and

Reference	Theme	Issue	Comments	Applicant's Response
				9.24 Substation Firewater Containment Strategy [REP3-120]. These documents provide for lined drainage, automatic or remotely operated isolation, and containment of the relevant rainfall and firewater volumes. The detailed drainage design will be approved under Requirement 11 of the Draft DCO [REP4-004], with operational inspection and maintenance addressed through the Outline OEMP [REP4-051].
WC1-296	Hydrology, Flood Risk and Drainage	LFA Position Statement on Hydrology, Flood Risk and Drainage Matters	Residual Theme 1 – Interrelationship Between Documents 26.47. This remains one of the strongest residual themes. Atkin's review identified that hydrology-related controls are distributed across several documents rather than being presented within a single cohesive framework.	The Applicant notes the LLFA's queries regarding the distribution of hydrology-related controls across several documents. The Applicant considers that this reflects the subject-specific nature of the controls rather than a gap in the management framework. Drainage design, soil management, vegetation management, construction activities and operational maintenance are governed through the document most appropriate to each activity. The Applicant agrees that the relationship between those documents

Reference	Theme	Issue	Comments	Applicant's Response
				should be clearly explained through the SoCG and, where helpful, through cross-referencing within the relevant management plans.
WC1-297	Hydrology, Flood Risk and Drainage	LFA Position Statement on Hydrology, Flood Risk and Drainage Matters	26.48. The FRA, Drainage Strategy, LEMP, SRMP, CEMP, OEMP and supporting documents all contain controls relevant to hydrological performance. Individually, many of these controls appear appropriate. However, it is not always clear how they work together to maintain runoff management, soil condition, vegetation condition, erosion resistance and watercourse protection.	The Applicant agrees that the relevant controls operate collectively. The site-specific Flood Risk Assessment and Drainage Strategy appendices [REP4-023 to REP4-035] establish the flood risk baseline, drainage principles, runoff controls and location-specific mitigation. The Outline CEMP [REP4-049] controls construction-phase drainage, runoff, sediment and pollution. The Outline SRMP [REP4-053] , controls soil handling, compaction prevention, monitoring, remediation and verification. The ecological and landscape management measures control vegetation establishment and long-term habitat management. The Outline OEMP [REP4-051] provides the operational inspection, maintenance and corrective-action framework.

Reference	Theme	Issue	Comments	Applicant's Response
				These documents are complementary. They do not establish separate or conflicting hydrological standards.
WC1-298	Hydrology, Flood Risk and Drainage	LFA Position Statement on Hydrology, Flood Risk and Drainage Matters	26.49. The LLFA is therefore seeking 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 provides the following explanation of how the documents work together: • ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP4-012] identifies the relevant hydrological mechanisms and assesses the Scheme's effects. • The site-specific Flood Risk Assessment and Drainage Strategy appendices [REP4-023 to REP4-035] establish the drainage principles, runoff controls, exceedance routing and site-specific mitigation. • The Outline CEMP [REP4-049] governs temporary drainage, erosion, sediment, pollution prevention and construction-phase flood response. • The Outline SRMP [REP4-053], governs soil condition, trafficking,

Reference	Theme	Issue	Comments	Applicant's Response
				compaction inspection, remediation and verification. • ES Volume 1, Chapter 9: Ecology and Biodiversity [REP4-010] and the relevant landscape and ecological management measures govern vegetation establishment, habitat maintenance and replacement. • The Outline OEMP [REP4-051] governs operational inspection, drainage maintenance, reporting and corrective action. • The drainage schemes required under Requirement 11 of the Draft DCO [REP4-004] will convert the submitted principles into detailed, phase-specific drainage designs. The Applicant considers that this provides a coherent hierarchy from assessment, through design principles, to construction and operational implementation.

Reference	Theme	Issue	Comments	Applicant's Response
WC1-299	Hydrology, Flood Risk and Drainage	LFA Position Statement on Hydrology, Flood Risk and Drainage Matters	26.50. This matter is appropriate for resolution through the SoCG process because it relates to document integration and management plan clarity.	The Applicant agrees that the interrelationship between the relevant documents can be clarified through the SoCG process and will continue to engage with the LLFA to agree suitable wording.
WC1-300	Hydrology, Flood Risk and Drainage	LFA Position Statement on Hydrology, Flood Risk and Drainage Matters	26.51. The LLFA also notes that the draft DCO contains drainage-related mechanisms, including Requirement 11 for approval of surface and foul water drainage schemes, Article 17 relating to discharge of water, and protective provisions for drainage authorities. The LLFA considers it important that the final management plan framework clearly explains how these DCO mechanisms interact with the FRA, Drainage Strategy, CEMP, OEMP, Water Management Plan and ordinary watercourse protection requirements.	The Applicant agrees that the mechanisms in the draft DCO operate alongside the submitted assessment and management plans. Requirement 11 of the Draft DCO [REP4-004] requires approval of the detailed surface water and foul water drainage schemes before commencement of the relevant part of the authorised development. These schemes must reflect the principles established in the site-specific Flood Risk Assessment and Drainage Strategy appendices [REP4-0423 to REP4-035]. Article 17 of the Draft DCO [REP4-004] governs the discharge of water associated with the authorised development, while the protective

Reference	Theme	Issue	Comments	Applicant's Response
				provisions outline the relevant functions and consenting roles of drainage authorities. The 7.12 Outline CEMP [REP4-049] provides the construction-phase water management framework, including temporary drainage, sediment and pollution controls. The Outline OEMP [REP4-051] addresses operational drainage inspection and maintenance. Works affecting ordinary watercourses remain subject to the relevant consenting and protective provision requirements. The Applicant therefore considers that the DCO, FRA and Drainage Strategies, and management plans form an integrated framework covering detailed design, construction, operation and watercourse protection.
WC1-301	Hydrology, Flood Risk and Drainage	LFA Position Statement on Hydrology, Flood Risk and Drainage Matters	Residual Theme 2 – Long-Term Vegetation Monitoring and Management 26.52. The Applicant has placed substantial reliance on vegetation as a runoff and erosion control measure. The	The Applicant notes that vegetation contributes to the management of runoff and erosion. The Scheme's approach combines the maintenance of vegetation cover with protection of soil structure, avoidance

Reference	Theme	Issue	Comments	Applicant's Response
			Ecology and Biodiversity chapter, LVIA Methodology and Cotswolds National Landscape Assessment contain relevant commitments around vegetation establishment and long-term management.	and remediation of compaction, retention of existing ground levels and runoff pathways, erosion control and the provision of controlled drainage for formal infrastructure. These mechanisms are assessed in ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP4-012] . Vegetation establishment, maintenance and replacement are addressed through ES Volume 1, Chapter 9: Ecology and Biodiversity [REP4-010] and the Outline LEMP [REP3-100] . Soil condition and the monitoring of hydrologically relevant indicators beneath and between the Solar PV Panels are addressed through the updated Outline SRMP [EN010168/APP/7.15] (Revision 4), which has been submitted at Deadline 5.
WC1-302	Hydrology, Flood Risk and Drainage	LFA Position Statement on Hydrology, Flood Risk and	26.53. However, the LLFA considers that further clarification is required regarding how vegetation condition will be monitored specifically for hydrological performance. Particular attention should be given to sparse	The Applicant agrees that vegetation condition should be monitored where deterioration could indicate an effect on hydrological performance.

Reference	Theme	Issue	Comments	Applicant's Response
		Drainage Matters	ground cover, beneath-panel vegetation condition, drip-line erosion, channelisation, rilling, bare ground, flow concentration and remedial measures where vegetation fails.	The updated Outline SRMP [EN010168/APP/7.15] (Revision 4), to be submitted at Deadline 5, includes operational visual monitoring beneath and between the Solar PV Panels. The monitoring will identify indicators including ponding, vegetation failure and other evidence of impaired soil condition or concentrated runoff. Where such indicators are identified, the cause will be investigated by a suitably qualified soil practitioner and appropriate remedial action undertaken. Evidence of sparse cover, bare ground, drip-line erosion, rilling or channelisation would therefore be considered as part of the inspection of vegetation and soil condition, rather than solely through ecological monitoring. Remedial measures would be selected according to the identified cause and may include soil loosening, repair of eroded areas, reseedling or changes to vegetation and land management. Vegetation establishment, maintenance and replacement remain addressed through the Outline LEMP [REP3-100],

Reference	Theme	Issue	Comments	Applicant's Response
				while the wider operational monitoring, reporting and corrective-action framework is provided through the Outline OEMP [REP4-051] .
WC1-303	Hydrology, Flood Risk and Drainage	LFA Position Statement on Hydrology, Flood Risk and Drainage Matters	26.54. These matters are important because deterioration in vegetation condition could reduce infiltration, increase runoff velocity and increase sediment mobilisation. The LLFA therefore considers that vegetation monitoring should not be treated solely as an ecological requirement, but also as part of the flood risk management framework.	The Applicant agrees that vegetation condition is relevant to hydrological performance and should not be considered solely as an ecological matter. The hydrological function of vegetation is to maintain ground cover, provide surface roughness, reduce erosion susceptibility and limit the development of concentrated flow pathways. Its effectiveness is also dependent on the underlying soil remaining in a suitable structural condition. Vegetation and soil monitoring must therefore be considered together. This relationship is recognised in ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP4-012] and is translated into management controls through the Outline LEMP [REP3-100], the Outline OEMP [REP4-051] and the updated Outline SRMP

Reference	Theme	Issue	Comments	Applicant's Response
				[EN010168/APP/7.15] (Revision 4), to be submitted at Deadline 5. The updated Outline SRMP [EN010168/APP/7.15] (Revision 4) requires monitoring of ponding, vegetation failure and soil condition, with investigation, remediation and subsequent verification where an issue is identified. This ensures that vegetation performance is considered as part of the flood risk management framework as well as the ecological management framework.
WC1-304	Hydrology, Flood Risk and Drainage	LFA Position Statement on Hydrology, Flood Risk and Drainage Matters	Residual Theme 3 – Recognition of the Hydrological Function of Vegetation and Soils 26.55. The LLFA considers that the Applicant's documents appropriately recognise ecological and agricultural objectives. However, the hydrological function of vegetation and soils is often implicit rather than explicit.	The Applicant notes the LLFA's comment and agrees that the hydrological functions of vegetation and soils should be clearly expressed. Vegetation cover and soil condition are interdependent controls on runoff. Vegetation provides ground cover, surface roughness and erosion resistance, while soil structure and permeability influence infiltration, runoff generation and the potential for ponding or concentrated flow. The Applicant's assessment therefore does not treat

Reference	Theme	Issue	Comments	Applicant's Response
				these matters solely as ecological or agricultural considerations. The hydrological mechanisms are assessed in ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP4-012]. Vegetation establishment and maintenance are addressed through the Outline LEMP [REP3-100], while soil protection, compaction monitoring, remediation and verification are addressed through the updated 7.15 Outline SRMP [EN010168/APP/7.15] (Revision 4), to be submitted at Deadline 5. The Applicant considers that these documents collectively make the hydrological function of vegetation and soils clear and provide the necessary monitoring and corrective-action framework.
WC1-305	Hydrology, Flood Risk and Drainage	LFA Position Statement on Hydrology, Flood Risk and Drainage Matters	26.56. Vegetation contributes to infiltration, surface roughness, raindrop interception, erosion resistance and the slowing of shallow surface flows. Soil structure influences permeability, storage, infiltration and runoff response.	The Applicant agrees that vegetation and soil condition perform important hydrological functions. Paragraphs 17.10.17 to 17.10.19 of ES Volume 1, Chapter 17: Soils and Agriculture [REP3-022] address the

Reference	Theme	Issue	Comments	Applicant's Response
			These matters are relevant to both ES Volume 1 Chapter 9 and ES Volume 1 Chapter 17.	risk of soil erosion arising from panel runoff by reference to vegetation cover, soil texture, topography and soil stability beneath the Solar PV Panels. They also explain that erosion risk is reduced where grass cover is established compared with land under arable cultivation. Vegetation establishment and long-term management are addressed through ES Volume 1, Chapter 9: Ecology and Biodiversity [REP4-010] and the relevant landscape and ecological management measures. Soil structure, compaction prevention, monitoring and remediation are addressed through ES Volume 1, Chapter 17: Soils and Agriculture [REP3-022] and the updated Outline SRMP [EN010168/APP/7.15] (Revision 4). Together, these documents recognise that vegetation cover and soil structure influence infiltration, surface roughness, erosion resistance, runoff generation and the slowing of shallow surface flows.

Reference	Theme	Issue	Comments	Applicant's Response
WC1-306	Hydrology, Flood Risk and Drainage	LFA Position Statement on Hydrology, Flood Risk and Drainage Matters	26.57. The LLFA considers that future management plans should explicitly identify vegetation and soils as hydrological assets. This would better align the management framework with the Applicant's explanation that runoff behaviour is influenced by soil condition, vegetation cover, compaction and erosion processes.	The Applicant notes this comment. The updated Outline SRMP [EN010168/APP/7.15] (Revision 4), to be submitted at Deadline 5, expressly recognises the relationship between soil condition, vegetation performance and hydrological function. It provides for monitoring of soil condition, ponding and vegetation failure beneath and between the Solar PV Panels, with investigation and remediation where indicators of impaired hydrological performance are identified.
WC1-307	Hydrology, Flood Risk and Drainage	LFA Position Statement on Hydrology, Flood Risk and Drainage Matters	Residual Theme 4 – Soil Compaction Monitoring and Remediation 26.58. The Soils and Agriculture chapter demonstrates a much stronger appreciation of soil compaction risk than was evident earlier in the examination.	The Applicant welcomes the LLFA's recognition that the updated soils assessment provides a stronger understanding of soil compaction risk.
WC1-308	Hydrology, Flood Risk and Drainage	LFA Position Statement on Hydrology, Flood Risk and Drainage Matters	26.59. Nevertheless, the LLFA considers that additional information is still required regarding long-term operational monitoring and verification. The relevant issues include how	The Applicant considers that the updated Outline SRMP [EN010168/APP/7.15] (Revision 4), to be submitted at Deadline 5, provides the requested framework for construction

Reference	Theme	Issue	Comments	Applicant's Response
		Drainage Matters	compaction will be inspected, what inspection methodology will be used, what thresholds will trigger intervention, what remediation standards will apply, how remediation success will be verified, how repeat compaction will be prevented and how operational access and maintenance activities will be managed.	and operational monitoring, remediation and verification. During construction, inspections will be undertaken following pile installation and before the Solar PV Panels are fixed. Monitoring will include visual assessment of trafficking and compaction indicators, supported by hand-dug soil pits and VESS where required to establish the depth and severity of any compaction. Where compaction is identified, remediation will be undertaken while the affected area remains accessible. The form and depth of treatment will be determined by the soil condition identified, with further soil pits used to verify that the affected layer has been adequately treated before panel installation proceeds. During operation, visual monitoring beneath and between the Solar PV Panels will identify indicators including ponding, vegetation failure or other evidence of impaired soil condition. Where such indicators are recorded, the cause will be investigated by a suitably

Reference	Theme	Issue	Comments	Applicant's Response
				qualified soil practitioner and appropriate remediation undertaken in suitable ground conditions. The effectiveness of remedial measures will be reviewed through subsequent monitoring. The relevant indicators of successful remediation are the absence of recurring waterlogging and the re-establishment of vegetation. Repeat compaction will be managed through controls on vehicle access, routing, ground conditions and the use of appropriate low ground-pressure equipment during maintenance activities. The Applicant therefore considers that the updated management framework addresses the inspection methodology, intervention triggers, remediation, verification and prevention of repeat compaction sought by the LLFA.
WC1-309	Hydrology, Flood Risk and Drainage	LFA Position Statement on Hydrology, Flood Risk and	26.60. This issue is hydrologically important because compacted soils can reduce infiltration and increase runoff. The LLFA therefore considers that compaction monitoring should be	The Applicant agrees that soil compaction is relevant to hydrological performance because deterioration in soil structure can reduce infiltration, increase runoff generation and

Reference	Theme	Issue	Comments	Applicant's Response
		Drainage Matters	treated as a flood risk management measure, not simply as an agricultural restoration measure.	contribute to ponding or concentrated flow. Compaction is therefore not treated solely as an agricultural restoration matter. Its hydrological implications are assessed through ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP4-012] and ES Volume 1, Chapter 17: Soils and Agriculture [REP3-022]. The corresponding prevention, monitoring, remediation and verification measures are set out in the updated Outline SRMP [EN010168/APP/7.15] (Revision 4), to be submitted at Deadline 5. These measures form part of the wider flood risk management framework relied upon to maintain infiltration, vegetation condition and existing runoff behaviour throughout construction and operation.
WC1-310	Hydrology, Flood Risk and Drainage	LFA Position Statement on Hydrology, Flood Risk and	Residual Theme 5 – Construction Phase Drainage and Monitoring 26.61. The revised CTMP contains a much stronger governance framework	The Applicant welcomes the LLFA's recognition that the revised Outline CTMP [REP4-057] provides a stronger governance framework.

Reference	Theme	Issue	Comments	Applicant's Response
		Drainage Matters	than earlier versions, including monitoring, reporting, responsibilities, complaints handling, compliance and corrective action.	
WC1-311	Hydrology, Flood Risk and Drainage	LFA Position Statement on Hydrology, Flood Risk and Drainage Matters	26.62. The LLFA welcomes this improvement. However, the remaining concern relates specifically to construction-phase water management, rather than traffic governance itself.	The Applicant notes that the LLFA's remaining concern relates specifically to construction-phase water management rather than traffic governance. Construction-phase drainage, runoff, erosion, sediment and pollution controls are addressed through the Outline CEMP [REP4-049], supported by the site-specific Flood Risk Assessment and Drainage Strategy appendices [REP4-023 to REP4-035] and the Outline SRMP [EN010168/APP/7.15] (Revision 4), to be submitted at Deadline 5.
WC1-312	Hydrology, Flood Risk and Drainage	LFA Position Statement on Hydrology, Flood Risk and Drainage Matters	26.63. Further clarification would be beneficial regarding temporary drainage arrangements, runoff control during soil stripping and access construction, sediment control, temporary storage, watercourse protection during construction, maintenance of temporary drainage measures, flood response	The Applicant considers that the matters identified by the LLFA are addressed through the construction environmental management framework, with the detailed measures to be developed for each phase and location before construction commences.

Reference	Theme	Issue	Comments	Applicant's Response
			procedures, inspection during wet weather, management of haul roads and temporary hardstanding, and reinstatement of temporary drainage pathways.	Temporary drainage and runoff control will be addressed through the detailed CEMP prepared in accordance with the Outline CEMP [REP4-049]. This will include measures appropriate to the final construction sequence, ground conditions, topography, watercourses and existing drainage pathways. During soil stripping, access formation and construction of temporary working areas, the measures will seek to prevent uncontrolled runoff, erosion and sediment mobilisation. Measures may include temporary cut-off drains, settlement features, check dams, silt fencing, sediment traps, temporary storage and controlled discharge arrangements, selected according to the local conditions and risk. Temporary drainage measures will be inspected and maintained throughout construction, including following significant rainfall and where monitoring identifies blockage, erosion, sediment accumulation or reduced performance. Watercourse buffers and existing drainage features will be protected from

Reference	Theme	Issue	Comments	Applicant's Response
				unnecessary vehicle access, storage and deposition of materials. Haul roads and temporary hardstanding will be managed to avoid creating uncontrolled barriers or preferential flow routes. Where they intersect existing drainage pathways, suitable cross-drainage will be provided to maintain hydraulic connectivity. Temporary measures will be removed or appropriately reinstated following completion of the relevant works so that existing drainage pathways and ground conditions are restored. Flood preparedness and response procedures, including inspection during forecast or actual wet weather, will be included within the detailed construction arrangements. The Applicant considers that this provides the appropriate framework for the temporary drainage, sediment control, maintenance, monitoring and reinstatement measures identified by the LLFA.

Reference	Theme	Issue	Comments	Applicant's Response
WC1-313	Hydrology, Flood Risk and Drainage	LFA Position Statement on Hydrology, Flood Risk and Drainage Matters	26.64. Construction activities have the greatest potential to disturb soils, alter runoff pathways and increase sediment mobilisation. The LLFA therefore considers that construction-phase drainage controls should be clearly defined and linked to monitoring and corrective action.	The Applicant agrees that construction activities present the greatest potential for temporary disturbance of soils, alteration of runoff pathways and mobilisation of sediment. These risks are addressed through the combined operation of the Outline CEMP [REP4-049] and the Outline SRMP [EN010168/APP/7.15] (Revision 4), to be submitted at Deadline 5. The detailed CEMP will define the temporary drainage, runoff, erosion and sediment controls required for the relevant phase and location. It will also identify responsibilities for inspection and maintenance and require corrective action where measures are damaged, blocked, overtopped or otherwise not performing as intended. The Outline SRMP [EN010168/APP/7.15] (Revision 4) will control soil handling, trafficking, compaction monitoring and remediation. Together, these plans provide the link between construction-phase drainage

Reference	Theme	Issue	Comments	Applicant's Response
				controls, monitoring and corrective action sought by the LLFA.
WC1-314	Hydrology, Flood Risk and Drainage	LFA Position Statement on Hydrology, Flood Risk and Drainage Matters	Residual Theme 6 – Monitoring, Governance and Performance Triggers 26.65. This remains one of the most important residual themes.	The Applicant notes this comment.
WC1-315	Hydrology, Flood Risk and Drainage	LFA Position Statement on Hydrology, Flood Risk and Drainage Matters	26.66. The CTMP demonstrates that the Applicant can establish a structured governance framework with monitoring, reporting, responsibilities, complaints handling and escalation. The LLFA considers that a similar level of clarity should be provided for hydrological performance monitoring.	The Applicant agrees that hydrological controls require clear governance, monitoring, reporting and corrective action. The relevant arrangements are provided through the subject-specific plans rather than through the Outline CTMP [REP4-057] . Construction-phase drainage and sediment controls are governed through the Outline CEMP [REP4-049] . Soil condition, compaction monitoring, remediation and verification are governed through the Outline SRMP [EN010168/APP/7.15] (Revision 4), to be submitted at Deadline 5. Operational inspection and maintenance are

Reference	Theme	Issue	Comments	Applicant's Response
				governed through the Outline OEMP [REP4-051]. The Applicant considers that this subject-specific structure provides clearer accountability than duplicating the same controls within a separate hydrological governance plan.
WC1-316	Hydrology, Flood Risk and Drainage	LFA Position Statement on Hydrology, Flood Risk and Drainage Matters	26.67. The LLFA would welcome clearer information regarding inspection frequencies, responsible parties, monitoring parameters, performance indicators, trigger thresholds, corrective actions, reporting mechanisms, audit procedures, escalation routes, and links to the SoCG and management plan review process.	The Applicant considers that the management framework provides, or will provide through the detailed plans, the information identified by the LLFA. The detailed plans will identify the parties responsible for implementing, inspecting and maintaining the relevant controls. Monitoring parameters will reflect the mechanism being managed and will include, as relevant, the condition and functionality of temporary and permanent drainage measures, evidence of ponding, vegetation failure, bare ground, erosion, rilling, channelisation, sediment accumulation and soil compaction. Inspection frequencies will be proportionate to the activity and risk. Construction controls will be inspected

Reference	Theme	Issue	Comments	Applicant's Response
				routinely and following significant rainfall or events that could affect their performance. Operational monitoring will include inspections of drainage infrastructure, soil condition and vegetation beneath and between the Solar PV Panels. The Applicant does not consider that a single numerical threshold is appropriate for every hydrological mechanism. Performance triggers will instead be linked to observable evidence that the required function is not being maintained. Examples include recurring ponding, blocked or damaged drainage features, sediment escape, erosion, rilling, channelisation, vegetation failure or confirmed soil compaction. Where a trigger is identified, the cause will be investigated and corrective action undertaken. This may include repair or clearance of drainage measures, additional sediment controls, soil loosening, erosion repair, reseeding, changes to access arrangements or further monitoring. The effectiveness of

Reference	Theme	Issue	Comments	Applicant's Response
				the action will then be verified through subsequent inspection. Monitoring and remedial actions will be recorded through the relevant management plan reporting procedures. The detailed plans will also establish escalation and review arrangements where an issue is recurring, significant or not resolved by the initial corrective action.
WC1-317	Hydrology, Flood Risk and Drainage	LFA Position Statement on Hydrology, Flood Risk and Drainage Matters	26.68. These arrangements are important because the Applicant's strategy relies on maintaining vegetation, soils and drainage function over time. Without clear trigger thresholds and corrective actions, there is less certainty that deterioration in hydrological performance would be identified and addressed before adverse effects occur.	The Applicant agrees that the continued hydrological performance of vegetation, soils and drainage measures depends on deterioration being identified and addressed. The Applicant considers that the appropriate triggers are based on evidence of impaired function rather than arbitrary numerical thresholds that may not be applicable across the different soils, slopes, drainage features and receptors within the Scheme. The updated Outline SRMP [EN010168/APP/7.15] (Revision 4), to be submitted at Deadline 5, identifies ponding, vegetation failure and evidence

Reference	Theme	Issue	Comments	Applicant's Response
				of compaction as triggers for investigation and remedial action. It also requires subsequent monitoring to confirm that recurring waterlogging has ceased and vegetation has re-established. The Outline CEMP [REP4-049] will require corrective action where temporary drainage, erosion or sediment controls are not functioning effectively. The Outline OEMP [REP4-051] provides the wider operational inspection, maintenance and reporting framework. The Applicant therefore considers that the relevant plans provide a clear route from inspection, through identification of impaired performance, to investigation, remediation and verification.
WC1-318	Hydrology, Flood Risk and Drainage	LFA Position Statement on Hydrology, Flood Risk and Drainage Matters	Relationship to the Statement of Common Ground 26.69. The six residual themes are high-level groupings for a wider set of detailed hydrology-related SoCG matters.	The Applicant notes that the six residual themes provide high-level groupings for the detailed hydrology matters being discussed through the SoCG process.

Reference	Theme	Issue	Comments		Applicant's Response
WC1-319	Hydrology, Flood Risk and Drainage	LFA Position Statement on Hydrology, Flood Risk and Drainage Matters	26.70. The table below sets out how the themes may translate into SoCG matters. The LLFA anticipates that many of these matters could be resolved through refinement of the LEMP, SRMP, CEMP, OEMP and related supporting documents.		The Applicant agrees that many of the detailed matters are capable of resolution through targeted clarification and refinement of the relevant management plans. The Applicant will continue to engage with the LLFA through the SoCG process to clarify the relationship between the Outline CEMP [REP4-049], Outline OEMP [REP4-051], Outline SRMP [REP4-053] and the relevant landscape and ecological management documentation. The Applicant does not consider that a separate hydrology management plan is required, provided that the respective controls, responsibilities, monitoring requirements and corrective actions are clearly identified within the document governing the relevant activity.
WC1-320	Hydrology, Flood Risk and Drainage	LFA Position Statement on Hydrology, Flood Risk and Drainage Matters	Residual theme	Likely SoCG matters	The Applicant notes that the residual themes and associated SoCG matters are organisational categories intended to assist the ongoing discussion. The Applicant agrees that the detailed matters should continue to be
			Document	Management plan hierarchy, cross-	

Reference	Theme	Issue	Comments		Applicant's Response
			integratio n	references, hydrological control framework	addressed through the relevant subject-specific documents and the SoCG process, rather than treated as separate standalone hydrology requirements.
			Vegetatio n monitorin g	Sparse cover, drip-line erosion, channelisation, intervention triggers	
			Hydrologi cal function	Recognition of soil and vegetation as drainage/flood risk controls	
			Soil compacti on	Inspection methods, thresholds, remediation and verification	
			Construct ion drainage	Temporary drainage, sediment control, flood response, maintenance	
			Governa nce	Monitoring frequencies, reporting, responsibilities, corrective actions	
WC1-321	Hydrology, Flood Risk and Drainage	LFA Position Statement on Hydrology, Flood Risk and	26.71. Consequently, the themes should be viewed as organisational categories.		The Applicant notes this comment.

Reference	Theme	Issue	Comments	Applicant's Response
		Drainage Matters		
WC1-322	Hydrology, Flood Risk and Drainage	LFA Position Statement on Hydrology, Flood Risk and Drainage Matters	Overall LLFA Position at Deadline 4 26.72. The LLFA acknowledges the substantial progress made by the Applicant during the examination and welcomes the constructive engagement that has taken place.	The Applicant welcomes the LLFA's acknowledgement of the progress made and the constructive engagement undertaken during the Examination.
WC1-323	Hydrology, Flood Risk and Drainage	LFA Position Statement on Hydrology, Flood Risk and Drainage Matters	26.73. The LLFA is no longer seeking additional scheme-wide hydraulic modelling and considers that many previously raised concerns have either been resolved or substantially narrowed.	The Applicant welcomes the LLFA's confirmation that additional scheme-wide hydraulic modelling is no longer sought and that previously raised concerns have been resolved or substantially narrowed.
WC1-324	Hydrology, Flood Risk and Drainage	LFA Position Statement on Hydrology, Flood Risk and Drainage Matters	26.74. The most significant remaining issues relate to 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	The Applicant notes the residual matters identified by the LLFA. These matters are addressed through the relevant subject-specific documents, including the Outline CEMP [REP4-049] , Outline OEMP [REP3-094] , Outline SRMP [REP4-053] and the

Reference	Theme	Issue	Comments	Applicant's Response
			drainage and water management, and long-term monitoring, governance and performance triggers.	relevant landscape and ecological management documentation. The Applicant considers that the remaining discussion relates to clarification and refinement of the implementation, monitoring and verification framework rather than any deficiency in the underlying flood risk assessment methodology.
WC1-325	Hydrology, Flood Risk and Drainage	LFA Position Statement on Hydrology, Flood Risk and Drainage Matters	26.75. The LLFA does not currently consider these matters to represent fundamental concerns to the overall flood risk strategy. Rather, they relate to ensuring that the long-term management, monitoring, maintenance and verification framework is sufficiently robust to maintain hydrological performance throughout the operational life of the development.	The Applicant welcomes the LLFA's confirmation that the remaining matters do not represent fundamental concerns with the overall flood risk strategy. The Applicant agrees that the focus is now on ensuring that the identified controls are implemented, monitored, maintained and, where necessary, corrected throughout the Scheme's lifetime. The relevant outline management plans provide the framework for the detailed plans to define the location-specific responsibilities, inspection arrangements, performance indicators, intervention triggers and remedial actions.

Reference	Theme	Issue	Comments	Applicant's Response
WC1-326	Hydrology, Flood Risk and Drainage	LFA Position Statement on Hydrology, Flood Risk and Drainage Matters	26.76. The LLFA therefore considers that the remaining issues are capable of resolution through further refinement of the relevant management plans and continued engagement through the Statement of Common Ground process.	The Applicant welcomes the LLFA's view that the remaining matters are capable of resolution through refinement of the relevant management plans and continued engagement through the SoCG process. The Applicant will continue to engage with the LLFA to clarify the relationship between the relevant documents and agree any targeted amendments required.

3.2 Wiltshire Council – Follow-Up Response to ExA's First Written Questions (ExQ1)

Table 3-2

Reference	Theme	Issue	Comments	Applicant's Response
Wiltshire Council's responses to the Examining Authority's First Written Questions are shown in blue text. The Applicant's responses in this document address those comments.				
CE1.2	Cumulative Effects	All Local Authorities	List of Cumulative Projects The applicant considered a long list of projects when assessing cumulative effects. Are there any updates or comments regarding any of those applications identified, or have any new applications come to light that are significant enough to require consideration cumulatively with the proposed development? Your response should consider the D1A submission by Community Action: Whitley and Shaw (CAWS) Annex A Energy and Enabling Schemes in Shaw, Whitley and the Wider Melksham Substation Area [REP1A-019] Without commenting on the screening criteria, the council is of the opinion that the long list of cumulative developments appears comprehensive and also	The scheme identified forms part of allocation CH1 and has been included and assessed as part of the short listed schemes (ID 256 within Table 21-4 of ES Chapter 21 Cumulative and In-Combination Effects [APP-073]. No cumulative effects were identified. Notwithstanding PL/2026/03545 provides further detail and therefore been further considered. The scheme is an outline planning application on the southern side of Chippenham for circa 400 residential units together with mixed commercial, business and leisure use. It is located approximately 1.4km to the east of the cable route corridor. On the basis of the scale, location and nature of the proposed scheme, interaction with the Lime Down project is limited to construction traffic effects, should the construction

Reference	Theme	Issue	Comments	Applicant's Response
			appears to include those developments referenced within the CAWS response. Some of those CAWS identified developments are not taken through to the short list because they have been constructed and therefore included in the baseline for assessment purposes. Wiltshire Council is aware of one additional development proposal which is not included within the long list due to the recency of submission: Planning Application: PL/2026/03545 (https://development.wiltshire.gov.uk/pr/s/planning-application/a0iQ300000M3j2L/pl202603545).	programmes overlap. The Lime Down cable corridor construction traffic routes (page 53 of REP4-057) include the A350 which runs adjacent to the proposed development and Corsham Road approximately 1.6km to the south. Each cable route access point is expected to be used for a total of approximately 90 days (which need not be consecutive) over the construction phase with up to four accesses (one per 5.5 km section of the Cable Route Corridor) in operation at one time. The Cable Route Corridor will generate the following total number of trips on an average day (page 24-25, REP4-057): HGV – 16 deliveries (32 movements); LGV - 16 deliveries (32 movements). Construction worker arrivals (car/van) – 40 arrivals (80 movements). These trips will be distributed around the local highway network and will be spread across 28 access locations. Given the short duration each cable access location will be in use, together

Reference	Theme	Issue	Comments	Applicant's Response
				with limited vehicle movements per day at a single location and adoption of the highway mitigation and management measures set out within the Outline Construction Traffic Management Plan [REP4-057] , no cumulative effects are identified.
TT1.19	Transportation, Traffic and Highway Safety (TT)	Wiltshire Council (Local Highway Authority)	Road Safety Data The applicant states in ES Appendix 13.1 (Transport Assessment) [REP1-057] that it obtained personal injury collision statistics on the local road network. from Wiltshire Council. Can the Council advise if it keeps data on road traffic collisions with pedestrians, cyclists and horse riders and if so, whether this data was provided to the applicant and can be submitted into the Examination? The period 2018-2023 is the data period that the applicant has used, so for consistency purposes it is this period which the ExA is interested in.	The Applicant makes note of this comments. Personal injury collision statistics on the local road network. from Wiltshire Council .

Reference	Theme	Issue	Comments	Applicant's Response
			Wiltshire Council as Local Highway Authority will collect and maintain Personal Injury Collision (PIC) data for its highway network. The council has extracted the data that it holds for the period 01/07/2018 to 30/06/2023 and this is contained within this response. This comprises: • North Wiltshire Area 1 Map • North Wiltshire Area 2 Map • North Wiltshire Area 3 Map • North Wiltshire Area 4 Map • North Wiltshire Area 5 Map • North Wiltshire Area 6 Map • Intermediate Collision Report • Interpreted Listing Report.	

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

4.1 Environment Agency - Comments on Lime Down Solar Park 9.32 Hydraulic Modelling Report Document Reference Exam/9.32 June 2026 REP3-131. Follow-on review.

Table 4-1

Reference	Theme	Comment			Applicant's Response
EA-000	Hydrology, Flood Risk and Drainage Matters	Lime Down Solar Park 9.32 Hydraulic Modelling Report. Document Ref: Exam/9.32. June 2026 REP3-131	Issue:	There is missing information with regards to the input hydrology applied to the model	The Applicant welcomes the Environment Agency's confirmation that the updated Hydraulic Modelling Report [REP3-131] addresses its previous comments regarding the delineation of the 3.3% AEP functional floodplain, the presentation of the 1% AEP plus 71% climate change scenario and the representation of bank levels. The Applicant also notes that the Environment Agency considers the explanation of the surveyed bank levels to be reasonable.
EA-001	Hydrology, Flood Risk and Drainage Matters		Impact:	It is not possible to repeat or check the flow calculations without a corresponding	The supporting FEH calculation record for Gauze Brook has now been provided directly to the Environment Agency. The record includes the information required to verify the peak flow estimates applied within the hydraulic model, including the catchment definition, catchment

Reference	Theme	Comment			Applicant's Response
				Flood Estimation Handbook (FEH) calculation record or detail on input catchment locations and other parameters	descriptors, QMED estimation, pooling group and hydrograph derivation. This addresses the Environment Agency's request for the supporting hydrological information referenced in Section 2.4 of the Hydraulic Modelling Report [REP3-131]. The Applicant also confirms that the downstream sill level for orifice unit GAU_3290ou is 87 mAOD. The value of 7 mAOD in the current model is a typographical error. The structure is not located on the principal flood flow route and only a small proportion of the overall flood flow reaches it. The error therefore does not materially affect the modelled flood extents, flood levels or conclusions of the flood risk assessment. Initial results from the model incorporating the corrected sill level confirm that it does not result in a material change to the assessment. The revised reporting will also explain the differences between the peak flows presented in the April 2026 and June 2026 versions of the hydraulic modelling report, with the FEH calculation record providing the basis for the latest design flow estimates. The FEH calculation record will be appended to a revised Hydraulic Modelling Report [REP3-131],
EA-002	Hydrology, Flood Risk and Drainage Matters		Solution:	Please provide a corresponding FEH calculation record for the design flows if available or at least the grid reference of the downstream lumped catchment, catchment descriptors	

Reference	Theme	Comment			Applicant's Response
				along with any adjustments made, choice of donor station for median annual flood (QMED) estimation, and pooling group composition. It would also be useful if the applicant could confirm how hydrograph shape has been derived. It is assumed this is based on the Revitalised Flood Hydrograph	to be submitted at Deadline 5. The report and hydraulic model are also being updated using an extended detailed channel survey to assess potential NFM measures around Gauze Brook. These measures are being explored as a potential community benefit and are not relied upon as mitigation required to make the Scheme acceptable in flood risk terms. The remaining work before Deadline 5 is therefore to: • incorporate the FEH calculation record into the revised hydraulic modelling report; • explain the change in design flows between the April and June 2026 reports; • incorporate the corrected 87 mAOD sill level into the revised hydraulic model and report; and • complete the extended detailed channel survey and updated modelling of the potential NFM measures. The revised report and supporting model information will be submitted at Deadline 5 and provided to the Environment Agency for review.

Reference	Theme	Comment			Applicant's Response
				(ReFH2) approach with model parameters and storm duration informed by catchment descriptors. This should be made clear in the reporting. This is particularly important as the peak flows appear to have changed when comparing the flows shown in the latest version of the model report (June 2026)	

Reference	Theme	Comment			Applicant's Response
				with the previous version of the model report (April 2026).	
EA-003	Hydrology, Flood Risk and Drainage Matters	Additional narrative:	The updated version of the hydraulic modelling report dated June 2026 (document reference: REP3-131) includes a specific assessment of the 3.3% (1 in 30) Annual Exceedance Probability (AEP) scenario to reflect the functional floodplain. A map is included showing the extent of this scenario within figure 3. Additionally, a map showing the extent of flooding in the 1% (1 in 100) AEP plus 71% (upper) climate change scenario has been included within figure 5. This addresses previous		

Reference	Theme	Comment	Applicant's Response
		comments raised with respect to defining the extent of the functional floodplain and providing details of an upper climate change scenario within the model report. The review of the corresponding hydraulic model files for the Gauze Brook undertaken by the Environment Agency in May 2026 identified two key issues, firstly with respect to orifice unit GAU_3290ou under the South Wales Main Line, the model review noted a significant drop in level (80 metres) between the upstream and downstream sill level for the structure. This appeared unrealistic. Additionally, the review highlighted some	

Reference	Theme	Comment	Applicant's Response
		discordances when comparing bank top elevations within the model with the latest 1 metre horizontal resolution Lidar data dated 2022. The updated model report (June 2026) provides some details in relation to these issues. It appears the downstream sill elevation of 7 metres Above Ordnance Datum (mAOD) for orifice unit GAU_3290ou is a typographical error which will be updated in the model to correctly reflect the downstream sill level of 87 mAOD according to table 2 of the updated model report. Table 2 of the updated model report provides	

Reference	Theme	Comment	Applicant's Response
		some information on the representation of bank levels and why these do not always match with the underlying Lidar DTM data. It appears that bank levels are largely based on topographic survey data rather than Lidar data which would explain some of the differences observed in places. This justification appears reasonable. Section 2.4 page 10 of the updated model report (June, 2026) states that a separate Flood Estimation Calculation record is available upon request and provides full details of the hydrological assessment. This has not been provided.	

Reference	Theme	Comment		Applicant's Response
			The peak flows presented in Table 3 of the updated model report (June 2026) differ from those reported in the previous model report (April 2026). A reduction in the Gauze Brook design flow estimates has been identified in the updated submission. The reason for this change is not explained. In the absence of any justification or revised hydrological assessment, it would be expected that the design flows remain unchanged from the previous submission. As noted in the previous model review comments, the corresponding Flood	

Reference	Theme	Comment	Applicant's Response
		Estimation Handbook (FEH) calculation record should be provided to enable verification of the peak flows applied within the hydraulic model.	

4.2 Environment Agency - Updated comments and position on the issues raised in Applicant responses following review of documents submitted at Deadline 3

Table 4-2

EA RR ID Ref in PDA-009	Issue	Topic	Environment Agency Updated Position following Deadline 3 submissions	Applicant's Response
EA-001-EA-011s summarise the issues below	See below	See below	NA	N/A

EA RR ID Ref in PDA-009	Issue	Topic	Environment Agency Updated Position following Deadline 3 submissions	Applicant's Response
EA-012	REP1-008 3.1 Draft Development Consent Order (Rev 2)	Disapplying Flood Risk Activity Permits	Under Discussion We have now agreed in principle to the applicant's request to disapply the need for Flood Risk Activity Permits under the Environmental Permitting (England and Wales) Regulations 2016; based on the information in REP1-126 9.10 ES Volume 3 Appendix 9-9 Watercourse Crossing Schedule and subject to the inclusion of our standard protective provisions in the Development Consent Order. We note there are some amendments to our standard protective provisions in the REP3-006 3.1 Draft Development Consent Order (Rev 3).	The Applicant has included the EA's standard protective provisions within the Draft DCO [REP4-004]. These have been updated to align with the formatting requirements for statutory instruments, and to reflect that "limits of deviation" is not a term used in the DCO. The Applicant has sought clarification from the EA as to its preference to refer to "limits of deviation" or Order Limits, and subject to that confirmation will make the update at a future deadline.

EA RR ID Ref in PDA-009	Issue	Topic	Environment Agency Updated Position following Deadline 3 submissions	Applicant's Response
			Our standard protective provisions have been robustly reviewed and they are fit for purpose. Therefore, we do not agree to the proposed changes.	
EA-013	REP3-006 3.1 Draft Development Consent Order (Rev 3)	Requirement 13 Construction environmental	Agree- document has been updated to include the Environment Agency as a consultee.	It is noted that this matter is agreed.
EA-014	REP3-006 3.1 Draft Development Consent Order (Rev 3)	Requirement 14 Operational environmental management plan (OEMP)	Agree- document has been updated to include the Environment Agency as a consultee.	It is noted that this matter is agreed.
EA-015	REP1-008 3.1 Draft Development Consent Order (Rev 2)	Requirement 17 Soil Management	Agreed- As per Deadline 2 response.	It is noted that this matter is agreed.

EA RR ID Ref in PDA-009	Issue	Topic	Environment Agency Updated Position following Deadline 3 submissions	Applicant's Response
EA-016	Fisheries	Fish species protection	Agreed- As per Deadline 2 response.	It is noted that this matter is agreed.
EA-017	Fisheries, Biodiversity and Geomorphology	Watercourse Crossings	Agreed- As per Deadline 2 response.	It is noted that this matter is agreed.
EA-018	Fisheries, Biodiversity and Geomorphology	Commitment s register: mitigation	Agreed- As per Deadline 2 response.	It is noted that this matter is agreed.
EA-019	Fisheries, Biodiversity and Geomorphology	Ecological assessments	Agree- As per Deadline 2 response.	It is noted that this matter is agreed.
EA-020	Fisheries, Biodiversity and Geomorphol	Aquatic invertebrates	Agree- As per Deadline 2 response.	It is noted that this matter is agreed.
EA-021	Fisheries, Biodiversity and	Watercourse buffers	Under Discussion We recommend that all applicants provide a minimum	The Applicant notes the Environment Agency's advisory

EA RR ID Ref in PDA-009	Issue	Topic	Environment Agency Updated Position following Deadline 3 submissions	Applicant's Response
	Geomorphology		10 metre watercourse buffer from the bank-top for all watercourses (ordinary watercourses and main watercourses). This is a standard baseline we request for all schemes, based on professional opinion. The purpose is to provide a wide margin to maintain connectivity and a continuous pathway for wildlife (especially to allow otters to commute in high flow), allow habitat creation across the landscape in the form of tussocky grass, scrub and scattered trees to provide shelter for riparian mammals and a general biodiversity value; and finally to provide a buffer that maintains bank stability and to capture runoff to improve water quality.	recommendation for a minimum 10 m buffer to all watercourses. The Scheme applies a receptor-specific buffer approach. A minimum 8 m buffer from the bank top is maintained around ditches and watercourses, with wider buffers applied where justified by ecological sensitivity. This includes 10 m buffers to major watercourses and where otter or abundant water vole signs are present, and buffers of up to 15 m to certain minor watercourses where identified through the ecological assessment and design process. The Applicant considers this approach proportionate and sufficient to protect watercourse function, bank stability, water quality and ecological connectivity.

EA RR ID Ref in PDA-009	Issue	Topic	Environment Agency Updated Position following Deadline 3 submissions	Applicant's Response
			However, we stress that the recommendation to provide a 10m buffer around ordinary watercourses is an advisory comment from the Environment Agency, and we defer to the Lead Local Flood Authority for comments on ordinary watercourses The applicant has not updated the 10m buffer for wash-down in the most recent iteration of the Outline Construction Environmental Management Plan (REP3-093), but we acknowledge the applicant's comment to 'review and update where required'.	The Applicant notes the Environment Agency's confirmation that its recommendation for a 10 m buffer to ordinary watercourses is advisory and that it defers to the LLFA on those watercourses. The Applicant does not consider that a blanket 10 m buffer to every ordinary watercourse is necessary where the submitted receptor-specific assessment has identified an 8 m buffer as appropriate. The Outline Construction Environmental Management Plan [EN010168/APP/7.12] (Revision 5), has been updated at Deadline 5 to require vehicle and plant wash-down facilities to be located a minimum of 10 m from watercourses and drainage features. This is separate from the permanent

EA RR ID Ref in PDA-009	Issue	Topic	Environment Agency Updated Position following Deadline 3 submissions	Applicant's Response
				watercourse buffer approach and provides the specific pollution prevention control requested by the Environment Agency.
EA-022	Water Framework Directive	Groundwater Bodies	Agree The Applicant has updated the Groundwater Bodies Plan (Rev 1) [REP3-140] and ES Volume 1 ,	It is noted that this matter is agreed.
EA-023	Groundwater and Contaminated Land	Piling	Agree ES Volume 1 Chapter 19 Ground Conditions (Rev 3) [REP3-023] has been updated as requested	It is noted that this matter is agreed.
EA-024	Groundwater and Contaminated Land	Battery Energy Storage System (BESS) foundation	Agree The 7.12 Outline Construction Environmental Management Plan (Rev 4) [REP3-092] has been updated as requested.	It is noted that this matter is agreed.

EA RR ID Ref in PDA-009	Issue	Topic	Environment Agency Updated Position following Deadline 3 submissions	Applicant's Response
		solution		
EA-025	Groundwater and Contaminate d Land	Fire water supply and storage within the Outline Battery Safety Management Plan (Outline BSMP)	Agree- as per Deadline 2 response.	It is noted that this matter is agreed.
EA-026	Groundwater and Contaminate d Land	Ground infrastructure will be left in- situ following the decommissio ning phase	Agree- as per Deadline 2 response.	It is noted that this matter is agreed.
EA-027	Groundwater and Contaminate d Land	Suitable mitigation where groundwater may be encountered.	Agree The following documents have been updated as requested, 7.12 Outline Construction Environmental Management Plan (Rev 4) [REP3-092]	It is noted that this matter is agreed.

EA RR ID Ref in PDA-009	Issue	Topic	Environment Agency Updated Position following Deadline 3 submissions	Applicant's Response
EA-028	Groundwater and Contaminated Land	Per-and poly fluoroalkyl substances (PFAS) based materials	Agree- as per Deadline 2 response.	It is noted that this matter is agreed.
EA-029	Groundwater and Contaminated Land	Licensed groundwater abstractions	Agree The Applicant has confirmed that no additional private water supply information has been obtained. The mitigation measures to protect the identified abstractions are identified in 7.12 Outline Construction Environmental Management Plan (Rev 4) [REP3-092]	It is noted that this matter is agreed.
EA-030	Groundwater and Contaminated Land	Thermal implications of cables	Under Discussion ES Volume 1 Chapter 19 Ground Conditions (Rev 3)	The Applicant can confirm that the guidance provided by the EA has been noted and this is now reflected in Section 19.11.10 of 6.1 ES Volume 1

EA RR ID Ref in PDA-009	Issue	Topic	Environment Agency Updated Position following Deadline 3 submissions	Applicant's Response
			[REP3-023] has been updated, including sections 19.10.2 and 19.11.10. 19.10.2 states that "Micro routing of the cable will ensure that no cables are located within 50m of abstractions or GWDTE or within SPZ1." Cable Route Southwest lies within a Source Protection Zone 1 (SPZ1). It is not clear how the micro-routing will ensure that no cables are within SPZ1. Section 19.11.10 makes no reference to avoiding SPZ1. The Applicant has not demonstrated adherence to the conditions set out in the advice	Chapter 19 Ground Conditions [REP3-023]. Detailed assessments of thermal impacts from cables will be made once location-specific hydrogeological data is available from ground investigation to be completed prior to the construction phase. The applicant clarifies that "micro-routing" of cables is intended to include both horizontal and vertical routing within the ground, dependent on where groundwater is encountered during ground investigation. This confirmation of the nature of micro-routing exercise has been added to the chapter at Deadline 5.

EA RR ID Ref in PDA-009	Issue	Topic	Environment Agency Updated Position following Deadline 3 submissions	Applicant's Response
			note we sent in February 2026. This includes proximity to SPZ1 and springs. More detail is required 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.	
EA-031	Groundwater and Contaminated Land	The Battery Energy Storage System (BESS) Area drainage outfall automatically self-actuating valves	Agree- as per Deadline 2 response.	It is noted that this matter is agreed.
EA-032	Groundwater and Contaminated Land	Ground conditions	Agree Pre-construction ground investigation will be secured via the Construction	It is noted that this matter is agreed.

EA RR ID Ref in PDA-009	Issue	Topic	Environment Agency Updated Position following Deadline 3 submissions	Applicant's Response
			Environmental Management Plan on which we will be consultees. We recommend that a period of groundwater monitoring, in accordance with relevant British Standard guidance for site investigations, is included as part of the ground investigation.	
EA-033	Groundwater and Contaminated Land	Discovery and Inspection Strategy	Agree- as per Deadline 2 response.	It is noted that this matter is agreed.
EA-034	Groundwater and Contaminated Land	Inconsistency in the walkover surveys carried out.	Agree. The following documents have been updated as requested. Appendices 19-1 [REP3- 069] , 19-4 [REP3-075] , 19-5 [REP3-077] & 19-8 [REP3-079]	It is noted that this matter is agreed.

EA RR ID Ref in PDA-009	Issue	Topic	Environment Agency Updated Position following Deadline 3 submissions	Applicant's Response
EA-035	Groundwater and Contaminated Land	Soil contamination during the operational phase.	Agree The following documents have been updated as requested: Outline Operational Environmental Management Plan [REP3-094] ES Volume 1 Chapter 19 Ground Conditions (Rev 3) [REP3-023] Note: Paragraph 19.11.14 of Chapter 19 [REP3-023] refers to a previous iteration of the Outline OEMP. It should reference REP3-094.	It is noted that this matter is agreed.
EA-036	Groundwater and Contaminated Land	Groundwater risks have	Agree The Applicant has suggested discussing the ground	It is noted that this matter is agreed.

EA RR ID Ref in PDA-009	Issue	Topic	Environment Agency Updated Position following Deadline 3 submissions	Applicant's Response
		not been appropriately assessed.	investigation design with the Environment Agency once it has been prepared, which we welcome.	
EA-037	Groundwater and Contaminated Land	Storage and management proposals for batteries have not been provided.	Agree- as per Deadline 2 response.	It is noted that this matter is agreed.
EA-038	Groundwater and Contaminated Land	Mitigation proposals managing risks to groundwater have not been adequately addressed.	Agree- as per Deadline 3 response	It is noted that this matter is agreed.
EA-039	Ground water and Contaminated Land	No Preliminary Risk Assessments (PRAs) for the interconnecting	Agree Applicant comments noted.	It is noted that this matter is agreed.

EA RR ID Ref in PDA-009	Issue	Topic	Environment Agency Updated Position following Deadline 3 submissions	Applicant's Response
		corridors between the main solar panel areas.		
EA-040	Groundwater and Contaminated Land	Maps and data searches in appendices 19-1, 19-2	Agree Applicant comments noted. Also discussed at meeting with the Applicant on 2 nd June 2026	It is noted that this matter is agreed.
EA-041	Groundwater and Contaminated Land	The PRA reports do not refer to the proposed Discovery and Inspection Strategy	Agree As per Deadline 2 response.	It is noted that this matter is agreed.
EA-042	Groundwater and Contaminated Land	PRA- off-site vehicle repair garage	Agree As per Deadline 2 response.	It is noted that this matter is agreed.

EA RR ID Ref in PDA-009	Issue	Topic	Environment Agency Updated Position following Deadline 3 submissions	Applicant's Response
EA-043	Groundwater and Contaminated Land	Unclear whether ground investigation to confirm the conceptual model is proposed to be carried out for several parts of the Proposed Development .	Agree As per Deadline 2 response.	It is noted that this matter is agreed.
EA-044	Groundwater and Contaminated Land	Justification for selecting the distances beyond which off site contamination sources would not be significant.	Agree As per Deadline 2 response.	It is noted that this matter is agreed.

EA RR ID Ref in PDA-009	Issue	Topic	Environment Agency Updated Position following Deadline 3 submissions	Applicant's Response
EA-045	Groundwater and Contaminated Land	Monks Park Mine	Agree Appendix 19-8 [REP3-079] has been updated to address this issue. Note: section 1.4.11 of Appendix 19-8 refers to a previous iteration of the Outline CEMP. It should refer to [REP3-092]	It is noted that this matter is agreed.
EA-046	Groundwater and Contaminated Land	No drainage strategies are provided for the proposed 400kV and 132kV Substations.	Agree The Outline OEMP [REP3-094] has been updated as requested.	It is noted that this matter is agreed.
EA-047	Groundwater and Contaminated Land	Present the SuDS options with consideration	Agree As per Deadline 2 response.	It is noted that this matter is agreed.

EA RR ID Ref in PDA-009	Issue	Topic	Environment Agency Updated Position following Deadline 3 submissions	Applicant's Response
		of the need for sealed drainage.		
EA-048	Groundwater and Contaminated Land	Table 4: SuDS Mitigation Indices is blank.	Agree Table 4 in Appendix 11-6 Flood Risk Assessment and Drainage Strategy - Lime Down D BESS [REP3-057] has been updated as requested.	It is noted that this matter is agreed.
EA-049	Flood Risk Assessment	Functional Floodplain (Flood Zone 3b).	Under Discussion We welcome the addition of the 3.3% (1 in 30) annual exceedance probability scenario flood depth and extent mapping for the Gauze Brook. We await the updated modelling and delineation of Flood Zone 3b for Lime Down E2 at deadline 4.	The Applicant welcomes the Environment Agency's acknowledgement that the 3.3% AEP flood depth and extent mapping for Gauze Brook addresses its previous comment on the delineation of the functional floodplain at Lime Down D. The updated assessment and delineation of Flood Zone 3b for Lime Down E2 were submitted at Deadline 4 through the Lime

EA RR ID Ref in PDA-009	Issue	Topic	Environment Agency Updated Position following Deadline 3 submissions	Applicant's Response
				Down E2 Hydraulic Modelling Report [REP4-089]. The report includes the 3.3% AEP modelled flood extent and depth mapping for Gabriel's Well and the associated watercourse network and provides the updated basis for identifying the functional floodplain at Lime Down E2. The associated hydraulic model files were also provided to the Environment Agency for review. The Applicant therefore considers that the information requested under this matter has now been submitted.
EA-050	Flood Risk Assessment	Fencing must not inhibit flood flow routes.	Agree Table 5 of the updated Outline Operational Environmental Management Plan (REP3-094) has been updated to state that post flood	It is noted that this matter is agreed.

EA RR ID Ref in PDA-009	Issue	Topic	Environment Agency Updated Position following Deadline 3 submissions	Applicant's Response
			inspections will be carried out as well as removing debris from fencing where safe and practicable. Where fencing is within mapped flood zones, it will comprise post and wire mesh fencing. This will be designed to maximise the passage of water.	
EA-051	Flood Risk Assessment	No assessment of the impacts the construction phase of the development will have on flood risk.	Under Discussion The applicant has updated all FRAs to include the following paragraph: <i>'During the construction phase, temporary works and construction activities will be managed to maintain existing floodplain storage, floodplain capacity and overland flood flow routes. Temporary compounds, plant and material storage will be located outside</i>	The Applicant acknowledges the Environment Agency's concern. The Applicant confirms that construction compounds, stockpiles and material storage areas will be located outside Flood Zone 3b. Plant will not be stored within Flood Zone 3b when not in use. This is consistent with the commitments relating to the siting of construction compounds and stockpiles in

EA RR ID Ref in PDA-009	Issue	Topic	Environment Agency Updated Position following Deadline 3 submissions	Applicant's Response
			<i>areas identified as potentially susceptible to flooding where reasonably practicable, and construction activities will be undertaken in accordance with the Outline CEMP [REP2-019] to ensure flood risk is not increased elsewhere.'</i> This is not sufficient. The applicant should commit to placing all construction compounds, material storage and plant outside of flood zone 3b. Additionally, more detail is needed for mitigation which will be implemented if compounds need to be located within the floodplain.	the Commitments Register [REP1-114]. Some temporary access by mobile plant may be required within areas of Flood Zone 3b to undertake the authorised works. In those circumstances, the detailed construction arrangements will ensure that: - existing floodplain storage, conveyance and overland flow routes are maintained; - no materials, spoil or equipment are left within Flood Zone 3b outside active working periods; - temporary works are minimised in extent and duration; - temporary drainage or cross-drainage is provided where required

EA RR ID Ref in PDA-009	Issue	Topic	Environment Agency Updated Position following Deadline 3 submissions	Applicant's Response
				to maintain hydraulic connectivity; • weather forecasts and flood warnings are monitored; • plant and personnel can be removed safely in advance of a forecast flood event; and • any temporary obstruction or ground disturbance is removed and the affected area reinstated following completion of the works. These measures will be set out in the detailed CEMP prepared in accordance with the Outline CEMP [REP4-049] and informed by the relevant site-specific Flood Risk Assessment and Drainage Strategy

EA RR ID Ref in PDA-009	Issue	Topic	Environment Agency Updated Position following Deadline 3 submissions	Applicant's Response
				appendices [REP4-023 to REP4-035]. The Applicant therefore considers that the Environment Agency's concern can be resolved through confirmation that compounds, stockpiles and stored plant will be excluded from Flood Zone 3b, together with the above controls for any short-term operational use of mobile plant within the floodplain.
EA-052	Flood Risk Assessment	It is not clear what freeboard allowances are proposed.	Under Discussion Section 2.3.14 page 12 of the updated Flood Risk Assessment for Lime Down D (REP3-058) and section 2.3.8 page 11 of the updated Flood Risk Assessment for Lime Down E2 (REP3-061) notes that the lowest leading edge of the panel itself does	The Applicant notes the Environment Agency's request for clarity on the freeboard applied to the lowest leading edge of Solar PV Panels within areas at risk of flooding. The position was clarified at Deadline 4 through ES Volume 3, Appendix 11-6: Flood Risk Assessment and Drainage

EA RR ID Ref in PDA-009	Issue	Topic	Environment Agency Updated Position following Deadline 3 submissions	Applicant's Response
			not comprise sensitive electrical equipment and may sit lower depending on the final fixed or tracker arrangement. Where solar PV panels are within areas at risk of flooding, we would typically expect an appropriate freeboard to be applied above the design flood level. This reflects standard practice and is consistent with approaches taken in comparable applications. This position is supported by the Overarching National Policy Statement for Energy (EN-1) Paragraph 5.8.7 states that new energy infrastructure should be designed to remain operational during flood events, while paragraph 5.8.12 highlights the need to safely	Strategy Lime Down D [REP4-031] and ES Volume 3, Appendix 11-8: Flood Risk Assessment and Drainage Strategy Lime Down E2 [REP4-035]. The updated documents confirm that the lowest leading edge of Solar PV Panels within the modelled flood extent will be raised above the 1% AEP plus climate change design flood level. Sensitive electrical equipment mounted on the panels will be set no less than 0.6 m above that design flood level. This approach ensures that the panels remain operational during the design event and avoids the panel surface becoming inundated and presenting an additional obstruction or blockage risk

EA RR ID Ref in PDA-009	Issue	Topic	Environment Agency Updated Position following Deadline 3 submissions	Applicant's Response
			manage flow conveyance and avoid adverse impacts from obstruction or deflection. If the solar panels themselves were inundated during the design flood event, this would likely compromise their operability. In addition, inundated panels could increase blockage potential within the floodplain and not just present a storage loss, with potential implications for flood flow routes and potential off-site impacts. The applicant should commit to a minimum freeboard for the lowest leading edge of solar panels above the design flood level.	within the floodplain. The Applicant therefore considers that the requested clarification has been provided.
EA-053	Flood Risk Assessment	Hydraulic model files for the Gauze	Under Discussion The applicant has provided the hydraulic model files for	The Applicant notes that the Environment Agency has now

EA RR ID Ref in PDA-009	Issue	Topic	Environment Agency Updated Position following Deadline 3 submissions	Applicant's Response
		Brook have not been reviewed.	the Gauze Brook and we have reviewed the modelling. The peak flows presented in Table 3 of the updated model report (June 2026) differ from those reported in the previous model report (April 2026). A reduction in the Gauze Brook design flow estimates has been identified in the updated submission. The reason for this change is not explained. In the absence of any justification or revised hydrological assessment, it would be expected that the design flows remain unchanged from the previous submission. As noted in the previous model review comments, the corresponding Flood Estimation calculation record	reviewed the Gauze Brook hydraulic model files. The supporting hydrological information for the Gauze Brook model was submitted at Deadline 4 through the relevant FEH Calculation Record. This provides the information required to verify the design flows applied within the Hydraulic Modelling Report [REP3-131], including the catchment definition, catchment descriptors, QMED estimation, donor station, pooling group composition, hydrograph derivation, ReFH2 parameters and storm duration. The FEH Calculation Record also explains the basis for the revised peak flows presented in Table 3 of the June 2026 report and the difference from the April 2026 version.

EA RR ID Ref in PDA-009	Issue	Topic	Environment Agency Updated Position following Deadline 3 submissions	Applicant's Response
			should be provided to enable verification of the peak flows applied within the hydraulic model. See also Appendix 2 for more detailed comments.	The Applicant therefore considers that the information requested to verify the peak flows applied within the Gauze Brook model has now been provided.
EA-054	Flood Risk Assessment	It is not clear how the analysis extent area of 275,000m2 has been derived.	Agree As per Deadline 2 response.	It is noted that this matter is agreed.
EA-055	Flood Risk Assessment	Impacts of the solar panel support frames on flood flow conveyance is not discussed. Lime Down D/BESS	Under Discussion. The applicant has undertaken sensitivity testing on floodplain roughness increasing this by 20% (ST1). This shows that any changes in level and extent from the increased roughness scenario are generally confined to the red	The Applicant welcomes the Environment Agency's confirmation that the sensitivity testing reported in the Hydraulic Modelling Report [REP3-131] provides confidence that the effects of the Solar PV Panel support columns on flood flow conveyance at Lime Down D

EA RR ID Ref in PDA-009	Issue	Topic	Environment Agency Updated Position following Deadline 3 submissions	Applicant's Response
			line boundary. This test gives confidence that any impacts from the solar panel support columns in terms of conveyance are likely to be very localised and within the red line boundary for the development. There is uncertainty in whether the solar PV panels will be raised with adequate freeboard above the design flood level (see item EA-052). If solar panels are inundated this could have a more notable effect on flood flow conveyance. We therefore seek clarity from the applicant on the freeboard applied to the lowest leading edge of the solar panels above the design	would be localised and generally confined within the Order limits. The remaining point relates to the freeboard applied to the lowest leading edge of the panels. As confirmed in response to EA-052, ES Volume 3, Appendix 11-6: Flood Risk Assessment and Drainage Strategy Lime Down D [REP4-031] was updated at Deadline 4 to confirm that the lowest leading edge of panels within the modelled flood extent will be raised above the 1% AEP plus climate change design flood level. Sensitive electrical equipment will be set no less than 0.6 m above that level. The panels would therefore not be inundated during the design event and would not present the

EA RR ID Ref in PDA-009	Issue	Topic	Environment Agency Updated Position following Deadline 3 submissions	Applicant's Response
			flood level before we can move this item to agreed.	additional blockage or conveyance risk identified by the Environment Agency. The Applicant considers that this matter can now be agreed.
EA-056	Flood Risk Assessment	It is not clear how the analysis extent area of 175,580m2 has been derived.	Agree As per Deadline 2 response.	It is noted that this matter is agreed.
EA-057	Flood Risk Assessment	Impacts of the solar panel support frames on flood flow conveyance is not discussed. Lime Down E2	Under Discussion We have yet to receive the model files for Lime Down E2. Similarly to item EA-055, we require further clarity from the applicant with regards to the freeboard applied to the lowest leading edge of the solar panels above the design	The Applicant confirms that the Lime Down E2 Hydraulic Modelling Report [REP4-089] was submitted at Deadline 4 and that the associated model files were provided separately to the Environment Agency for review. The modelling assesses flood behaviour associated with Gabriel's Well and the adjoining

EA RR ID Ref in PDA-009	Issue	Topic	Environment Agency Updated Position following Deadline 3 submissions	Applicant's Response
			flood level. Please also see item EA-052.	watercourse network, including the effect of the proposed Solar PV infrastructure on flood levels and conveyance. As confirmed in response to EA-052, ES Volume 3, Appendix 11-8: Flood Risk Assessment and Drainage Strategy Lime Down E2 [REP4-035] was updated at Deadline 4 to confirm that the lowest leading edge of panels within the modelled flood extent will be raised above the 1% AEP plus climate change design flood level. Sensitive electrical equipment will be set no less than 0.6 m above that level. The panels would therefore remain above the design flood level and would not present the additional inundation or blockage risk identified by the

EA RR ID Ref in PDA-009	Issue	Topic	Environment Agency Updated Position following Deadline 3 submissions	Applicant's Response
				Environment Agency. The Applicant considers that the requested modelling and freeboard clarification have now been provided.
EA-058	Outline Decommissioning Strategy	No clear commitment to the production of an outline or detailed Decommissioning Environmental Management Plan.	Agree As per Deadline 2 response.	It is noted that this matter is agreed.
EA-059	Cable Route Construction Method Statement	Cable Route Construction Method Statement	Under Discussion We note the amendment to the Outline CEMP [REP2-019] to include reference to the discovery strategy and updates to Table 13 in relation to the proposed ground investigation.	The Applicant confirms reference to the Discovery and Inspection Strategy was added to ES Volume 3, Appendix 3-2: Cable Route Construction Method Statement [REP4-039] at Deadline 4 of Examination.

EA RR ID Ref in PDA-009	Issue	Topic	Environment Agency Updated Position following Deadline 3 submissions	Applicant's Response
			We had previously requested that Appendix 3-2 Cable Route Construction Method Statement [APP-183] needs to be updated to include reference to the discovery strategy. This has not been actioned.	
EA-060	Biodiversity Net Gain	Trading Rules	Agree As per Deadline 2 response.	It is noted that this matter is agreed.
EA-061	Biodiversity Net Gain	Full Biodiversity Net Gain Metric has not been provided.	Agree- As per Deadline 2 response.	It is noted that this matter is agreed.

EA RR ID Ref in PDA-009	Issue	Topic	Environment Agency Updated Position following Deadline 3 submissions	Applicant's Response
EA-062	Outline Landscape and Ecological Managemen t Plan	Planting strategy misses opportunities to enhance the environment.	Agree- As per Deadline 2 response.	It is noted that this matter is agreed.
EA-063	Water Framework Directive Assessment	Change the description from "Supports Good" to "Not High" and possibly add an explanation.	Agree As per Deadline 2 response.	It is noted that this matter is agreed.
EA-064	Water Framework Directive Assessment	The assessment does not identify or discuss Groundwater Dependent Terrestrial Ecosystems (GWDTEs)	Agree As per Deadline 2 response.	It is noted that this matter is agreed.

EA RR ID Ref in PDA-009	Issue	Topic	Environment Agency Updated Position following Deadline 3 submissions	Applicant's Response
EA-065	Water Framework Directive Assessment	Subsurface infrastructure such as the Cable Corridor could impact the status of WFD Groundwater Bodies and should not be excluded from assessment.	Agree As per Deadline 2 response.	It is noted that this matter is agreed.
EA-066	Outline Battery Safety Managemen t Plan	Provide details of the products to be used in the proposed liquid cooling systems, and the means by which it will be contained, captured and	Agree As per Deadline 2 response.	It is noted that this matter is agreed.

EA RR ID Ref in PDA-009	Issue	Topic	Environment Agency Updated Position following Deadline 3 submissions	Applicant's Response
		disposed.		
EA-067	Outline Battery Safety Managemen t Plan	Provide more detail about the inspection and maintenance frequency and protocols for key controls at the BESS site.	Agree As per Deadline 2 response.	It is noted that this matter is agreed.
EA-068	Outline Battery Safety Managemen t Plan	No details are provided of the proposed testing suite or sampling protocol for potentially contaminated firewater captured at the BESS in	Agree As per Deadline 2 response.	It is noted that this matter is agreed.

EA RR ID Ref in PDA-009	Issue	Topic	Environment Agency Updated Position following Deadline 3 submissions	Applicant's Response
		a fire event.		
EA-069	Outline Battery Safety Managemen t Plan	It is not clear whether the proposed lining of the drainage system at the BESS would be impermeable.	Agree As per Deadline 2 response.	It is noted that this matter is agreed.
EA-070	Outline Construction Environment al Managemen t Plan	Water Quality Mitigation Measures are insufficient	Agree Water Quality Mitigation Measures associated with Vehicle washdown, concrete laying, foul water strategy and drilling fluid have been resolved due to updates to: REP1-018 6.1 ES Volume 1 Chapter 11 Hydrology, Flood Risk and Drainage (Rev 2); REP1-097 7.12Outline Construction Environmental Management	It is noted that this matter is agreed.

EA RR ID Ref in PDA-009	Issue	Topic	Environment Agency Updated Position following Deadline 3 submissions	Applicant's Response
			Plan (Rev 2) REP1-101 7.14 Outline Decommissioning Strategy (Rev 2). Table 5 and 13 of REP3-093 Outline Construction Environmental Management Plan now contains sufficient mitigation measures to protect water quality.	
EA-071	Outline Site Waste Management Plan	No inclusion that waste will be assessed in accordance with Waste Technical Guidance WM3	Agree As per Deadline 2 response.	It is noted that this matter is agreed.
EA-072	Permitting	Permitting Informative	Agree	It is noted that this matter is agreed.

EA RR ID Ref in PDA-009	Issue	Topic	Environment Agency Updated Position following Deadline 3 submissions	Applicant's Response
EA-073	Flood Risk Assessment	Compensatory flood storage	Under Discussion. If it is not possible to place 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. Engagement with the Environment Agency will occur throughout the detailed design stage on the need, method of calculating volumes,	The Applicant acknowledges the Environment Agency's position. The Lime Down C1 substation will be micro-sited outside mapped flood flow routes where practicable. The final location and detailed design will be informed by ES Volume 3, Appendix 11-4: Flood Risk Assessment and Drainage Strategy Lime Down C1 [REP4-027] and the detailed surface water drainage scheme prepared under Requirement 11 of the Draft DCO [REP4-004]. Where the final design indicates that the substation would affect a mapped flood flow route or result in a loss of floodplain storage, a site-specific assessment will be undertaken to demonstrate that flood risk would not be increased

EA RR ID Ref in PDA-009	Issue	Topic	Environment Agency Updated Position following Deadline 3 submissions	Applicant's Response
			modelling and design of any floodplain compensation that may be required. We would need to secure this through a requirement within the Development Consent Order. We request the following wording to secure this: Flood Mitigation Requirement <i>No development shall take place within Lime Down C1 until the location of the substation has been confirmed, an assessment of flood risk has been undertaken and a mitigation plan have been submitted to, and approved in writing by, the Local Planning Authority, in consultation with the Environment Agency, and these works shall be carried out as approved.</i>	elsewhere. Where that assessment identifies a material loss of floodplain storage or an increase in flood risk, appropriate mitigation, including level-for-level and volume-for-volume floodplain compensation where required, will be incorporated into the detailed design. Any compensatory storage would be provided before the associated loss of floodplain storage occurs and would be subject to appropriate inspection and maintenance arrangements during operation. The Applicant considers that these matters are already capable of being addressed through the detailed drainage scheme secured by Requirement 11 of the Draft DCO [REP4-004], which must

EA RR ID Ref in PDA-009	Issue	Topic	Environment Agency Updated Position following Deadline 3 submissions	Applicant's Response
			<i>Note:</i> Should the assessment show increased flood risk, the mitigation plan should include a Floodplain Compensation Scheme. Any proposed compensation scheme must demonstrate: - no net loss of floodplain storage within the design flood event; - compensation provided on a level-for-level and volume-for-volume basis where appropriate; - no increase in flood risk elsewhere; - implementation of compensatory storage	be approved in consultation with the EA. A separate flood mitigation requirement is therefore not considered necessary, noting that the EA will be in a position to review the final drainage scheme and advise the relevant planning authority that it should not be approved if it does not demonstrate that there will be no increase in flood risk elsewhere and include any compensatory measures shown to be required.

EA RR ID Ref in PDA-009	Issue	Topic	Environment Agency Updated Position following Deadline 3 submissions	Applicant's Response
			<i>prior to the associated floodplain loss; and</i> - <i>appropriate maintenance of the compensation scheme is in place during the operation phase.</i>	
EA-074	Outline Landscape And Ecological Management	Herbicide use	Agree- updates in paragraphs 1.3.122 and 1.3.135 in REP3-101 Outline Landscape and Ecological Management Plan resolve this.	It is noted that this matter is agreed.
EA-075	Outline Ecological Protection and Mitigation Strategy	Improvements to document	Agree As per Deadline 2 response.	It is noted that this matter is agreed.
EA-076	Firewater Drainage	Detail of fire water management . A	Agree As per Deadline 2 response.	It is noted that this matter is agreed.

EA RR ID Ref in PDA-009	Issue	Topic	Environment Agency Updated Position following Deadline 3 submissions	Applicant's Response
		standalone drainage plan is strongly recommende d.		
EA-077	BESS and Substation Drainage	Proposed drainage layout for the BESS and 400kv Substation development .	Agree As per Deadline 2 response.	It is noted that this matter is agreed.
EA-078	Lime Down E Desk Study	former RAF airfield at Hullavington.	Agree As per Deadline 2 response.	It is noted that this matter is agreed.
EA-079	outline Battery Safety Managemen t Plan	Battery replacements	Agree As per Deadline 2 response.	It is noted that this matter is agreed.

EA RR ID Ref in PDA-009	Issue	Topic	Environment Agency Updated Position following Deadline 3 submissions	Applicant's Response
EA-080	Intrusive Ground Investigations	Intrusive Ground Investigations	Agree As per Deadline 2 response.	It is noted that this matter is agreed.
EA-081	Decomission ing	Decomission ing of cables	Agree As per Deadline 2 response.	It is noted that this matter is agreed.
EA-082	Ground Investigation s	Purpose, scope and extent of ground investigation s	Agree As per Deadline 2 response.	It is noted that this matter is agreed.
EA-083	Battery Safety Managemen t Plan	Manual isolation of BESS systems	Agree As per Deadline 2 response.	It is noted that this matter is agreed.
EA-084	Battery Safety Management Plan	Battery storage infrastructure should not be delivered to site before all	Agree As per Deadline 2 response.	It is noted that this matter is agreed.

EA RR ID Ref in PDA-009	Issue	Topic	Environment Agency Updated Position following Deadline 3 submissions	Applicant's Response
		firewater containment arrangement s are installed and commissioned.		
EA-085	Battery Safety Management Plan	Emergency Response Plan	Agree As per Deadline 2 response.	It is noted that this matter is agreed.
EA-086	Foundation Design	Piling Risk Assessment references	Agree As per Deadline 2 response.	It is noted that this matter is agreed.
EA-087	Commitment s Register	Horizontal Directional Drilling	Agree As per Deadline 2 response.	It is noted that this matter is agreed.
EA-088	Commitments Register	Siting of construction compounds and stockpiles	Agree As per Deadline 2 response.	It is noted that this matter is agreed.

EA RR ID Ref in PDA-009	Issue	Topic	Environment Agency Updated Position following Deadline 3 submissions	Applicant's Response
EA-089	Commitments Register	Plant maintenance	Agree As per Deadline 2 response.	It is noted that this matter is agreed.
EA-090	Commitments Register	Breakout contingency procedures	Agree As per Deadline 2 response.	It is noted that this matter is agreed.
EA-091	Commitments Register	Per- and polyfluoroalk yl substances (PFAS)	Agree- As per Deadline 2 response.	It is noted that this matter is agreed.
EA-092	Commitments Register	BESS and substation drainage infrastructure	Agree As per Deadline 2 response.	It is noted that this matter is agreed.
EA-093	Commitments Register	Hydrological risk assessment	Agree As per Deadline 2 response.	It is noted that this matter is agreed.
EA-094	Commitments Register	Ground Investigations	Agree See our comments on the applicant's responses to	It is noted that this matter is agreed.

EA RR ID Ref in PDA-009	Issue	Topic	Environment Agency Updated Position following Deadline 3 submissions	Applicant's Response
			other issues surrounding the scope of the proposed ground investigation.	

EA Written Rep (WR) REP1-151 ID Ref in REP2-039	Issue	Topic	Environment Agency Updated Position following Deadline 3 submissions	Applicant's Response
WR EA-001	Ecology and Biodiversity	Biodiversity Net Gain	Agree	It is noted that this matter is agreed.
WR EA-002	Draft DCO	"Substantially in accordance with" requirements	Under Discussion We maintain our previous position set out in our written representation REP1-151	The Applicant maintains its position. The wording "substantially in accordance with" is standard drafting for DCO Requirements and balances the need for flexibility in the detailed design of the Scheme and the mitigation in the management plans with the need to

EA Written Rep (WR) REP1-151 ID Ref in REP2-039	Issue	Topic	Environment Agency Updated Position following Deadline 3 submissions	Applicant's Response
				secure all such necessary mitigation.
WR EA-003	Draft DCO Soil Manageme nt	Requirement 17	Agree	It is noted that this matter is agreed.
WR EA-004	Draft DCO	Procedure for Discharge of Requirements	Under Discussion We note the increase in timeframe but request the full 15 working days consultation period as set out in our written representation REP1-151	The Applicant notes this comment. Please refer to the Applicant's submissions on this matter during Issue Specific Hearing 4 in Written Summary of the Applicant's Oral Submissions and Responses at Issue Specific Hearing 4 and Responses to Action Points [REP4-087] . As noted, paragraph 2(1) of Schedule 16 requires the Applicant to submit a copy of the application to any Requirement consultee at the same time the application is submitted to the relevant planning authority. In this

EA Written Rep (WR) REP1-151 ID Ref in REP2-039	Issue	Topic	Environment Agency Updated Position following Deadline 3 submissions	Applicant's Response
				way, the EA will receive the full period to review the documentation.
WR EA-005	Water Quality	Foul Drainage	Agree -as per Deadline 3 response.	It is noted that this matter is agreed.
WR EA-006	Water Quality	Water Quality Monitoring	Agree We acknowledge updates to section 11.9.2 in Chapter 11 [REP1-017] , REP1-096 OCEMP Table 5, REP1-098 OOEMP Table 5 and REP1-100 ODS Table 5. Details are sufficient at this point in the project. We are now named as a consultee for CEMP and OEMP requirements to ensure we can review details post-consent. This resolves this issue which was raised in our written representation REP1-151 .	It is noted that this matter is agreed.

EA Written Rep (WR) REP1-151 ID Ref in REP2-039	Issue	Topic	Environment Agency Updated Position following Deadline 3 submissions	Applicant's Response
WR EA-007	Water Quality	Vehicle washdown and refuelling areas	Agree -as per Deadline 3 response.	It is noted that this matter is agreed.
WR EA-008	Water Quality	Concrete management	Agree - as per Deadline 3 response.	It is noted that this matter is agreed.
WR EA-009	Water Quality	Sediment control and SuDS	Agree - as per Deadline 3 response.	It is noted that this matter is agreed.
WR EA-010	Water Quality	Fuels, oils and chemical storage	Agree We note updates to Table 5 and Table 13 of OCEMP [REP1-96] about volume capacity of storage. Table 5 and 13 of REP3-093 Outline Construction Environmental Management Plan now contains sufficient mitigation measures to protect water quality.	It is noted that this matter is agreed.

EA Written Rep (WR) REP1-151 ID Ref in REP2-039	Issue	Topic	Environment Agency Updated Position following Deadline 3 submissions	Applicant's Response
WR EA-011	Water Quality	Wheel wash water disposal	Agree- as per Deadline 3 response.	It is noted that this matter is agreed.
WR EA-012	Water Quality	Outline Decommissioning Strategy	Agree- as per Deadline 3 response.	It is noted that this matter is agreed.
WR EA-013	Water Quality	Watercourse buffers	Agree- as per Deadline 3 response.	It is noted that this matter is agreed.
WR EA-014	Water Quality	Horizontal Directional Drilling (HDD) and Per- and polyfluoroalkyl substances (PFAS)	Agree- as per Deadline 3 response.	It is noted that this matter is agreed.
WR EA-015	Statement of Common Ground	Statement of Common Ground	Under Discussion The next version of the Statement of Common Ground will be submitted at Deadline 4.	The Applicant is continuing to engage with the Environment

EA Written Rep (WR) REP1-151 ID Ref in REP2-039	Issue	Topic	Environment Agency Updated Position following Deadline 3 submissions	Applicant's Response
				Agency in regard to the Statement of Common Ground.

4.3 National Highways – Comments on Submissions Received at Deadline 3

Table 4-3

Reference	Theme	Issue	Comments at Deadline 3	Applicant's Response at Deadline 3	NH Response	Applicant's Response
NH-003	Construction and Decommissioning	Directional Drilling	Technical Matters 2.3 Discussions with National Highways technical teams about the geotechnical specification	Technical Matters 2.3 Discussions with National Highways technical teams about the geotechnical specification	We have received some information regarding the geotechnical specification for directional drilling from internal colleagues. We are reviewing the information received	The Applicant notes this response

Reference	Theme	Issue	Comments at Deadline 3	Applicant's Response at Deadline 3	NH Response	Applicant's Response
			for directional drilling in relation to Works 5a are still underway. Any proposed directional drilling under NH's network will require compliance with The Design Manual for Roads and Bridges ("DMRB") Chapter CD622 (Managing Geotechnical Risk).	for directional drilling in relation to Works 5a are still underway. Any proposed directional drilling under NH's network will require compliance with The Design Manual for Roads and Bridges ("DMRB") Chapter CD622 (Managing Geotechnical Risk).	and will provide an update at the next deadline (or before).	

Reference	Theme	Issue	Comments at Deadline 3	Applicant's Response at Deadline 3	NH Response	Applicant's Response
NH-004	Description and DCO Process	Book of Reference	Land and Book of Reference Issues 2.4 Detrunked Roads (Plots 13-005 to 13-016, 20-001 to 20-003):- There are a significant number of plots where NH originally noted that the roads had been detrunked and transferred to the Local Highway Authority (LHA). The Applicant has	In the most recent submission of the Book of Reference [REP 1-012], the Applicant identified that National Highways registered address had been updated since DCO submission, which is reflected as a change in orange in the latest BoR. The Applicant undertook a HMLR refresh of titles affecting	In accordance with NH's standard protective provisions, the Applicant must not be permitted to exercise the powers of the Order to: (a) acquire or use land forming part of; (b) acquire new or existing rights over; or (c) impose or extinguish any restrictive covenants over any part of the strategic road network or land owned by National Highways, or extinguish any existing rights of or interfere with the apparatus of National Highways in respect of any third party	The Applicant notes this comment. Protective provisions for National Highways are included as Part 5 of Schedule 15 to the draft DCO [REP4-004] .

Reference	Theme	Issue	Comments at Deadline 3	Applicant's Response at Deadline 3	NH Response	Applicant's Response
			confirmed it will update the Book of Reference to remove NH's listed interests however the latest Book of Reference [REP 1-012] still shows NH's interest but in orange font.	plots 13-005 to 13-016, and 20-001 to 20-003, and established that the National Highways interests needed to remain within the plots due to the registered titles affecting those plots not being updated. The Applicant can confirm that once the registered titles affecting those plots have a new	property, except with the consent of National Highways. This has been secured through the agreed protective provisions.	

Reference	Theme	Issue	Comments at Deadline 3	Applicant's Response at Deadline 3	NH Response	Applicant's Response
				edition identifying the LHA as the proprietor, then the National Highways interests will be removed. At this time, the LHA have been captured as the Highway Authority, whilst National Highways have been identified as a registered title interest.		

Reference	Theme	Issue	Comments at Deadline 3	Applicant's Response at Deadline 3	NH Response	Applicant's Response
NH-005	Description and DCO Process	Side Roads Order Plots	2.5 Side Roads Order Plots (Plots 21-004 to 21-007): For plots forming part of a Side Roads Order for the M4 scheme, NH confirms that the LHA is responsible, not NH, given the Side Road Order. Accordingly, for these plots, provided works are not in the subsoil, NH have no interest. If works are in	Prior to the most recent submission of the Book of Reference [REP 1-012], the Applicant undertook a HMLR refresh of titles affecting plots 21-004 to 21-007, and established that the National Highways interests needed to remain within the plots due to the registered titles affecting	Please refer to NH's previous comment set out in column 4 in relation to this item.	The Applicant acknowledges National Highways explanation regarding the difference between the plots, and confirms that in the next Book of Reference provided during examination, the interests related to National Highways will be removed from the plots identified as being detrunked. The plots identified as affected by the side road order, the Applicant can confirm that works are within the operational highway only, and as such, the National Highway interests will

Reference	Theme	Issue	Comments at Deadline 3	Applicant's Response at Deadline 3	NH Response	Applicant's Response
			the subsoil then agreement by way of an easement is required from NH. The Applicant is requested to provide NH details confirming the depth of the works is requested to provide NH details confirming the depth of the works.	those plots not being updated. The Applicant can confirm that once the registered titles affecting those plots have a new edition identifying the LHA as the proprietor, then the National highways interests will be removed. The Applicant hasn't removed any legal interests within the subsoil of		be removed from the subsoil as requested.

Reference	Theme	Issue	Comments at Deadline 3	Applicant's Response at Deadline 3	NH Response	Applicant's Response
				highways to ensure it is presenting all interests in Part 1 of the Book of Reference [REP 1-012], even where the works may only affect the operational highways. The Applicant cannot definitively confirm that works would not extend into the subsoil, however this information would be		

Reference	Theme	Issue	Comments at Deadline 3	Applicant's Response at Deadline 3	NH Response	Applicant's Response
				provided to National Highways once confirmed at detailed design stage. This position is captured in the updated SoCG between the Applicant and National Highways.		
NH-006	Description and DCO Process	Outstanding Information Requests	2.6 Outstanding Information Requests: Several plots are included in the Book of Reference as a	The Applicant acknowledges the request for information from National Highways. After further review, the	13-09 is now removed from the Book of Reference. Limited utility information has been received. However, it is noted that the Applicant is unable to provide all supporting	The Applicant notes this comment. Protective provisions for National Highways are included as Part 5 of Schedule 15 to the draft DCO [REP4-004] .

Reference	Theme	Issue	Comments at Deadline 3	Applicant's Response at Deadline 3	NH Response	Applicant's Response
			consequence of drainage and gully apparatus, easements, and conveyances. In relation to these plots, NH's position is that the additional information requested is still required. Full details are set out in NH's Written Representations [REP1-154].	Applicant has identified the easement listed in plot 13-09 should not be classed as a NH interest, and as such, the Applicant will amend the interest within the BoR at the next submission during examination Within the Book of Reference [APP4.3], the Applicant has included NH interests	data. As such and in the absence of detailed design, the Applicant should be required to obtain NH's consent in the event the activities affect the SRN or any land NH has an interest in. Pursuant to the Protective Provisions, the Applicant cannot exercise compulsory acquisition/temporary possession powers without NH's consent.	

Reference	Theme	Issue	Comments at Deadline 3	Applicant's Response at Deadline 3	NH Response	Applicant's Response
				against apparatus after conducting research into utilities and apparatus within the Order Land during pre-application. The Applicant commissioned a third-party utility report, via Atkins Utility, who have access to multiple statutory undertakers' data spatially, which was shared to the Applicant. As		

Reference	Theme	Issue	Comments at Deadline 3	Applicant's Response at Deadline 3	NH Response	Applicant's Response
				such, there are no supporting documents such as an easement or register, however the Applicant can share the relevant utility line data with NH to aid their identification of interests.		
NH-007	Description and DCO Process	Protective Provisions	DCO 2.7 Protective Provisions:- The Protective Provisions on the face of the order are	As noted protective provisions for the protection of National Highways are included at Part 5 of	Whilst NH is content in principle with the PP's and Side Agreement reflecting the position agreed at Green Hill, NH has made it clear to the Applicant that there	The Applicant notes this comment.

Reference	Theme	Issue	Comments at Deadline 3	Applicant's Response at Deadline 3	NH Response	Applicant's Response
			not yet agreed, and an updated draft of the Protective Provisions is awaited. NH has provided a full set of proposed protective provisions at Appendix 1 to its Relevant Representation and has set out 3 detailed justifications for each provision (paragraphs 1 through to 21 of the proposed	Schedule 15 (Protective provisions) to the Draft Development Consent Order [REF1007]. As noted at Issue Specific Hearing 1 (see page 17 and 18 of the Written Summary of the Applicant's Oral Submissions and Responses at Issue Specific Hearing 1 and Responses in	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. Please see our comments in relation to specific requirements below.	

Reference	Theme	Issue	Comments at Deadline 3	Applicant's Response at Deadline 3	NH Response	Applicant's Response
			protective provisions). The Applicant's response to NH's Relevant Representations indicates that it is "progressing discussions" on the Protective Provisions and that draft Protective Provisions are already included in the DCO (Part 5 of Schedule 15). In response, and whilst	Action Points [REP1A-012]), relate entities of Island Green Power are promoting a number of other solar DCOs at varying stages of the consenting process, namely Green Hill Solar Farm. As the Applicant is a subsidiary of Island Green Power, where possible it is seeking a consistent		

Reference	Theme	Issue	Comments at Deadline 3	Applicant's Response at Deadline 3	NH Response	Applicant's Response
			discussions are progressing, NH maintains the draft Protective Provisions included in the Order are not agreed and that its own proposed Protective Provisions (at Appendix 1 of NH's Relevant Representation [RR-3426]) should be adopted.	approach with statutory undertakers to protective provisions across its projects. This includes protective provisions for the benefit of National Highways. This approach has been agreed with National Highways and the same form of protective provisions as agreed with National Highways in		

Reference	Theme	Issue	Comments at Deadline 3	Applicant's Response at Deadline 3	NH Response	Applicant's Response
				respect of the Green Hill Solar Farm were included in the Draft Development Consent Order [REP1-007] at Deadline 1. It is the Applicant's understanding that these are now agreed and, subject to agreement of a number of project specific points, the Applicant and National Highways will		

Reference	Theme	Issue	Comments at Deadline 3	Applicant's Response at Deadline 3	NH Response	Applicant's Response
				enter into a Side Agreement containing the agreed protective provisions.		
NH-008	Description and DCO Process	DCO Articles	2.8 Articles:- NH's extensive concerns regarding individual DCO articles (Articles 8, 10, 11, 12, 16, 17, 19, 20, 21, 24, 25, 27, 29, 30, 31, 32, 33, 34, 38, 40, 41, 42, and 47) as set out in its	The Applicant notes this comment. The cross-referencing error in Article 41 has been corrected in the updated draft DCO provided at Deadline 3. The TPO trees listed in Schedule 12 are those	Article 41 has now been corrected. The Applicant's response in relation to N/TPO7 is in adequate. We remain concerned that trenchless techniques may impact the root system and/or result in soil disruption to N/TP07. NH require evidence and confirmation that the proposed trenchless technique will not impact the roots or	Entry and exit pits for trenchless crossings will be sited outside root protection areas (RPAs) and the trenchless crossings will be dug at a sufficient depth to ensure no impacts to arboricultural features occur. The Applicant notes that works in the vicinity of the SRN will be subject to plan approval under the protective provisions for

Reference	Theme	Issue	Comments at Deadline 3	Applicant's Response at Deadline 3	NH Response	Applicant's Response
			Relevant Representations [RR-3426] remain outstanding. NH's concerns are re-iterated in summary in section 4.1 of NH's Written Representations [REP1-154]. In relation to Article 41 it is noted that the cross referring error to Part 4 of Schedule 12 has not been corrected in the latest draft of the	trees or groups of trees where the Applicant will need to carry out works to those trees. N/TPO7 is adjacent to the M4 motorway, which will be crossed using trenchless techniques. The trees, being adjacent to the highway, will also be crossed using trenchless techniques. As there is no	disturb the soil in relation to N/TPO7. In the absence of evidence, N/TPO7 should be included in Schedule 12.	National Highways at Part 5 of Schedule 15 to the draft DCO [REP4-004] . It is confident that whilst National Highways' concern is unfounded, it will nevertheless be able to satisfy itself that the HDD will not result in any harm to the trees through the submission of plans under the protective provisions.

Reference	Theme	Issue	Comments at Deadline 3	Applicant's Response at Deadline 3	NH Response	Applicant's Response
			DCO [REP1-007]. Reference should be made to Part 3 not Part 4. In addition, it is noted that TPO7 is not referred to in Schedule 12 but is adjacent to the SRN. The Applicant is requested to review Schedule 12 in light of the TPO and Hedgerow Plan (sheet 9 of 23). It is noted that the Applicant has	requirement for works to these trees, the power to do so is not included in the DCO and they have not been listed in Schedule 12. The Applicant confirms that it is seeking to agree the form of protective provisions for National Highways, which will address NH's remaining concerns.		

Reference	Theme	Issue	Comments at Deadline 3	Applicant's Response at Deadline 3	NH Response	Applicant's Response
			not responded on these points and has not updated the latest draft of the DCO [REP1007].			
NH-009	Description and DCO Process	Protective Provisions	2.9 The Applicant's response to NH's Relevant Representations [PDA - 009] consistently refers to ongoing discussions on the Protective Provisions. Whilst this is	The Applicant refers National Highways to the response given at NH-007.	See above response to NH-007	The Applicant notes this comment.

Reference	Theme	Issue	Comments at Deadline 3	Applicant's Response at Deadline 3	NH Response	Applicant's Response
			the position, the Protective Provisions on the face of the order are not yet agreed and an updated draft of Protective Provisions is awaited.			
NH-010	Description and DCO Process	Protective Provisions	2.10 Requirement s:- NH seeks not merely to be consulted but to review and agree the relevant documents and plans before Requirement	The Applicant notes this comment. NH will be appropriately consulted under Requirement s 15 and 16 and has approval rights under	As previously noted, a definition of relevant highway authority is required. It is noted that such a definition is not included in the latest draft of the DCO submitted at Deadline 3. In addition, please see our comments below in	Please refer to the Applicant's response to DCO2.2 in the Applicant's Response to the Examining Authority's Second Written Questions [EN010168/EXAM/9.54] . Highway authority is defined in article 2(1) of the

Reference	Theme	Issue	Comments at Deadline 3	Applicant's Response at Deadline 3	NH Response	Applicant's Response
			s are discharged, to ensure no adverse impact on the Strategic Road Network (SRN). The Applicant's response is that NH will already be a consultee where it is the relevant highway authority (Requirements 15 and 16), and that the Protective Provisions in Part 5 of Schedule 15	the Protective Provisions.	relation to each specific requirement.	draft DCO [REP4-004].

Reference	Theme	Issue	Comments at Deadline 3	Applicant's Response at Deadline 3	NH Response	Applicant's Response
			adequately protect NH's interests. The Applicant has stated that the management plans with the potential to impact the SRN are already captured. Discussions on the form of Protective Provisions are ongoing. NH's position is, however, as follows:			
NH-011	Description and DCO Process	Requirement 3	2.11 Requirement 3 (Approved	The modification made to the	NH stand by its previous comments that the Schedule 16	The Applicant notes this comment and refers to its response

Reference	Theme	Issue	Comments at Deadline 3	Applicant's Response at Deadline 3	NH Response	Applicant's Response
			Documents and Plans):- NH raises a specific concern that amendments to approved documents are left to the planning authority to assess, without NH being consulted. NH points to a precedent from the Green Hill Solar Farm DCO examination (same Applicant), where it was	draft DCO on the Green Hill Solar Farm was to update the definition of "requirement consultee" in Schedule 16 to include, for applications made under Requirement 3 to update an approved document, any consultee in relation to the original approval of that document. This update was included in the draft	change does not resolve NH's concerns regarding certified documents being amended and hence NH also require to be a named consultee in Requirement 3 itself. In addition, the definition of requirement consultee specifically refers to any body or authority named in a requirement as a body to be consulted by the relevant planning authority or in relation to an application made under requirement 3, any body or authority that was required to be consulted in	to DCO2.15 in the Applicant's Response to the Examining Authority's Second Written Questions [EN010168/EXAM/9.54].

Reference	Theme	Issue	Comments at Deadline 3	Applicant's Response at Deadline 3	NH Response	Applicant's Response
			agreed that any body consulted on the original approval must be reconsulted on amendments. NH seeks the same amendment for the Lime Down DCO which would mean that in relation to an application made under requirement 3 to amend an approved document, any body or authority that	DCO submitted at Deadline 1. The Applicant is confident that this approach is preferable to listing National Highways as a consultee within Requirement 3, as this would mandate consultation with National Highways on any amendment to any approved document,	relation to that approval. If NH are not named as an approving body in the requirement, then it will not come within the definition of requirement consultee and will not be consulted. Accordingly, NH maintain that it must be added as a consultee to the requirements noted below (7, 8, 10, 11, 13, 15, 16 and 20) to protect its position.	

Reference	Theme	Issue	Comments at Deadline 3	Applicant's Response at Deadline 3	NH Response	Applicant's Response
			was required to be consulted in relation to the approval of that approved document is required again to be consulted. The inclusion of such wording would mean that should an application be made to amend the CTMP, highways authorities are consultees and would need to be	whether or not National Highways was consulted on the original document, and irrespective of whether the proposed amendments relate to any part of the Scheme near or capable of affecting the strategic road network. The update made to Schedule 16 not only ensures that National Highways will		

Reference	Theme	Issue	Comments at Deadline 3	Applicant's Response at Deadline 3	NH Response	Applicant's Response
			consulted. This change alone however does not meet NH's concerns regarding certified documents being amended and hence NH also require to be a named consultee in Requirement 3 itself.	be consulted on amendments to documents that may affect it, but ensures that any named consultee is properly consulted on changes to documents they have a confirmed interest in.		
NH-012	Description and DCO Process	Consultee Status	2.12 Other Requirements Where NH Seeks Consultee	The Applicant does not consider it appropriate for NH to be	The Applicant has not provided a rationale for its rejection of NH's suggested amendment to	Requirement 5(4) provides that Work No. 5 must be carried out in accordance with Table 2-4 of the

Reference	Theme	Issue	Comments at Deadline 3	Applicant's Response at Deadline 3	NH Response	Applicant's Response
			Status: NH seeks to be consulted on a wide range of Requirements relating to its statutory function, including: - Requirement 5 – Details of Works Nos. 1, 2, 3 and 5a (amendments as per Relevant Representations). - Requirement 7 – Landscape and	a mandatory consultee on the Requirements listed. NH will be consulted in relation to the detailed construction traffic management plan where they are the relevant highway authority, under Requirements 15, 16 and 20. There is only limited interaction between the Scheme and	Requirement 5 so that Works 5a are included. NH note that the Outline CEMP and Outline Operational Environmental Management Plan are Outline only. It is anticipated that the information may be limited. NH will need to be consulted and approve the final versions of these documents. It is very likely that an outline document will be subject to amendments which will require NH's approval. NH's position on the requirements listed is set out in the draft	design principles and parameters. Work No. 5A is part of Work No. 5. It is therefore already included within Requirement 5. The Applicant also notes that National Highways must approve the plans for the cable crossing of its assets under the protective provisions for National Highways in Part 5 of Schedule 15 to the draft DCO [REP4-004], providing it with full oversight and control over Work No. 5A in the vicinity of the SRN.

Reference	Theme	Issue	Comments at Deadline 3	Applicant's Response at Deadline 3	NH Response	Applicant's Response
			ecological management plan – NH requires the opportunity to review the landscape and ecological management plan, arboricultural assessment /tree protection measures, and any replanting proposals in respect of NH's soft estate.	the SRN, and the nature of NH's concerns are such that they can be adequately addressed through Protective Provisions. National Highways' solicitors have confirmed agreement in principle with the draft Side Agreement and form of protective provisions subject to further	SOCG [REP2-030]. NH's comments on the draft SOCG were provided on 23 April 2026. A response from the Applicant is awaited.	

Reference	Theme	Issue	Comments at Deadline 3	Applicant's Response at Deadline 3	NH Response	Applicant's Response
			- Requirement 8 – Ecological protection and mitigation strategy. - Requirement 10 - Means of enclosure near the SRN - NH requires the opportunity to review the details for reasons of safety, liability, maintenance, and compliance with DfT	discussion between the parties on a select number of outstanding points. Negotiations in respect of these points remain ongoing.		

Reference	Theme	Issue	Comments at Deadline 3	Applicant's Response at Deadline 3	NH Response	Applicant's Response
			Circular 01/2022). Requirement 11 – Surface Water Drainage Scheme - NH requires an opportunity to review to protect SRN drainage infrastructure, ensure plans accord with DfT Circular 01/2022, to prevent any discharge into SRN systems and to			

Reference	Theme	Issue	Comments at Deadline 3	Applicant's Response at Deadline 3	NH Response	Applicant's Response
			ensure no new third party drainage connections are permitted. • Requirement 13 - CEMP, to ensure safeguards for the SRN. • Requirement 14 - Operational Environmental Management Plan - NH requires the opportunity to review the			

Reference	Theme	Issue	Comments at Deadline 3	Applicant's Response at Deadline 3	NH Response	Applicant's Response
			operational environmental management plan to ensure the management of long-term environmental risks associated with the site and ongoing protection of the SRN. • Requirement 15 – Final Construction Traffic Management Plan (not just the outline).			

Reference	Theme	Issue	Comments at Deadline 3	Applicant's Response at Deadline 3	NH Response	Applicant's Response
			NH's consultee role as relevant highway authority is understood to have been agreed however we are unable to identify the corresponding change in the latest dDCO [REP1-007]. Requirement 16 - Public rights of way and permissive paths. NH's			

Reference	Theme	Issue	Comments at Deadline 3	Applicant's Response at Deadline 3	NH Response	Applicant's Response
			consultee role as relevant highway authority is understood to have been agreed however we are unable to identify the corresponding change in the latest dDCO [REP1-007]. • Requirement 20 – Final Decommissioning Strategy (not just the outline).			

Reference	Theme	Issue	Comments at Deadline 3	Applicant's Response at Deadline 3	NH Response	Applicant's Response
			NH's consultee role as relevant highway authority is understood to have been agreed and a change has been made to the dDCO [REP1-007].in this regard.			
NH-013	Description and DCO Process	Schedule 16	2.13 Schedule 16 (Discharge of Requirement s): It is noted that the latest dDCO [REP1-007]	The Applicant notes this comment and confirms that the change requested was included in the Draft	Noted	The Applicant considers this matter to be resolved.

Reference	Theme	Issue	Comments at Deadline 3	Applicant's Response at Deadline 3	NH Response	Applicant's Response
			includes the change NH requires.	Development Consent Order [REP1-007] submitted at Deadline 1.		
NH-014	Transport and Access	Requirement 15	2.14 Traffic and Transport: NH accepts that no further capacity assessment of the SRN is required but maintains its position on the need for the CTMP under Requirement 15 and the rationale for	The Applicant confirms that Requirement 15 (Construction traffic management plan) of Schedule 2 (Requirements) to the Draft Development Consent Order [REP1-007] provides that a construction traffic	Noted.	The Applicant considers this matter to be resolved.

Reference	Theme	Issue	Comments at Deadline 3	Applicant's Response at Deadline 3	NH Response	Applicant's Response
			its proposed changes to that Requirement.	management plan must be approved by Wiltshire Council as relevant planning authority in consultation with National Highways (as relevant highway authority) prior to the commencement of the authorised development. A minor clarificatory change was made to Requirement 15 at		

Reference	Theme	Issue	Comments at Deadline 3	Applicant's Response at Deadline 3	NH Response	Applicant's Response
				Deadline 1 (to ensure consultees were included in the same subparagraph) and no further changes are currently being considered. The Applicant welcomes ongoing engagement with National Highways should any further changes be required in the future.		

4.4 National Highways – Comments on the Applicant's Response to Question 1.44 of the ExA's First Written Questions

Table 4-4

Reference	Theme	Question	Applicant's Response to WQ	NH Response	NH Further Comment	Applicant's Response
CO1.44	The Applicant National Highways	Requirement 15 - Construction traffic management plan Should Requirement 15(3), which requires the relevant planning authority to consult with South Gloucestershire Council and the relevant highway authority before approving the Construction	Requirement 15 is required to be approved by the relevant planning authority in consultation with South Gloucestershire Council and the relevant highway authority. This reflects that South Gloucestershire Council, as the relevant planning authority for	Yes. NH is responsible for the safe and efficient operation of the Strategic Road Network. Construction traffic can materially affect the capacity, safety, and physical integrity of that network. Being consulted on the CTMP enables NH to assess and	1) A definition of relevant highway authority is required. 2) The ExA's question relates to the CTMP but the Applicant's response refers to the CEMP. Clarity is required, particularly given the reference to either a single CEMP or	Please refer to the Applicant's response to DCO2.2 in the Applicant's Response to the Examining Authority's Second Written Questions [EN010168/EXAM/9.54] Highway authority is defined in article 2(1) of the draft DCO [REP4-004] .

Reference	Theme	Question	Applicant's Response to WQ	NH Response	NH Further Comment	Applicant's Response
		Traffic Management Plan, also include the requirement to consult with National Highways?	some of the highway improvement works, would ordinarily be the discharging authority. However, it has been agreed that Wiltshire Council will discharge this requirement in full, including those parts that apply to South Gloucestershire Council's area. Additionally, the relevant highway	mitigate risks arising from increased HGV movements, abnormal loads, and cumulative impacts at critical junctions and links on the SRN. Consultation with NH is essential to ensure that construction-phase impacts arising from the development are properly managed through	separate CEMPs.	The relevant highway authority will be one or all of: Wiltshire Council Highway Authority; South Gloucestershire Council Highway Authority; and National Highways. Given that all construction routes use the strategic road network NH will be consulted on all final CTMPs.

Reference	Theme	Question	Applicant's Response to WQ	NH Response	NH Further Comment	Applicant's Response
			authority must be consulted. This will be one or all of: Wiltshire Council Highway Authority; South Gloucestershire Council Highway Authority; and National Highways. Precisely which highway authorities are relevant will depend on whether a single CEMP is submitted for approval, or separate	appropriate routing, timing, and traffic management measures.		The reference to CEMP in the Applicant's response (see column 3) is a typographical error and should refer to the CTMPs.

Reference	Theme	Question	Applicant's Response to WQ	NH Response	NH Further Comment	Applicant's Response
			CEMPs for individual parts of the Scheme.			

4.5 Stop Lime Down – Comments on Deadline 3 Submissions

Table 4-5

Reference	Theme	Issue	Comments	Applicant's Response
SLD1-001	Landscape and Visual	Mitigation	3.1.Landscape Wiltshire Council Comments on Other Submissions at Deadline 2 [REP3-141] 3.1.1. Under the heading Point 4: The Benefits of Mitigation, at §4.23 the Council states, and SLD's landscape expert agrees, that "mitigation measures are not a benefit of the scheme. Mitigation is highlighted to be necessary to reduce the magnitude of visual effects. Whereas genuine landscape and visual enhancement would be considered a benefit of the scheme".	The Applicant notes these comments and directs SLD to the Applicant's Response to Stop Lime Down Issue Specific Hearing 2 Post Hearing Summary [REP4-085] In response to the ExAs Second Questions, the Applicant will submit a Plan which shows the areas considered to be mitigation and enhancement whilst noting that some mitigation of visual effects includes landscape enhancements, for example: strengthening existing landscape fabric components i.e. native field boundary

Reference	Theme	Issue	Comments	Applicant's Response
			3.1.2. Para. 4.24 goes on to say that "the scheme includes landscape enhancement by strengthening some existing landscape fabric components i.e. native field boundary hedgerows and planting new hedgerow trees, woodland, riparian corridor planting etc." 3.1.3. However, LVIA Table 8-18 indicates that these measures are mitigation, not enhancement, and care should be taken to distinguish between the two.	hedgerows and planting new hedgerow trees, woodland, riparian corridor planting etc.
SLD1-002	Landscape and Visual	CNL	CNL Board Comments on Other Submissions [REP3-154] 3.1.4. Among other things, SLD's landscape expert agrees with the CNL Board's comments and concerns under PMIE 4, about tranquillity, the Scheme's effects upon it, and the Applicant's approach to assessing the effects. 3.1.5. Appendix B to SLD's WR at [REP1-170] deals with this matter at §§6.2.6 – 6.2.18. 3.1.6. notes that aspects of tranquillity include a sense of security, and feeling	The Applicant notes these comments and directs SLD to the Applicant's Response to Stop Lime Down Issue Specific Hearing 2 Post Hearing Summary [REP4-085] The Applicant has undertaken a Tranquillity Assessment which will be submitted at Deadline 5.

Reference	Theme	Issue	Comments	Applicant's Response
			safe, which is very relevant to consideration of the effects of construction traffic using quiet lanes through the CNL which are regularly used for informal recreation.	
SLD1-003	Transport and Access	HGV Movements	3.2.Traffic and Transport 3.2.1. The Applicant submitted an updated Transport Assessment at Deadline 3 [REP3-066]. SLD notes that Table 13-12 has been amended to include a 50% uplift in total HGV movements. As discussed further below, previously the 50% uplift was applied to the daily HGV movements to represent day-to-day variation. Further, §1.5.12 asserts that a 50% uplift is being applied to reflect a peak day – however (again as discussed further below), the Applicant relies upon the 50% uplift as representing a variety of assumptions.	The Applicant makes note of this comment. The comment is correct in its assumption that the 50% uplift was added to represent day-to-day variation and to show the likely peak traffic generation on a single day. However, the assessment within ES Volume 1 Chapter 13: Transport and Access [REP4-014] uses the daily peak flows and therefore effectively tests a 50% uplift in total HGV movements. It is therefore important to bring this point out. In addition to the above, ES Volume 1 Chapter 13: Transport and Access [REP4-014] assumes that the peak daily traffic flows will occur on every day throughout the two-year construction phase. However, as an example, the construction of Lime Down A will only

Reference	Theme	Issue	Comments	Applicant's Response
				last for approximately 9 months. For clarity, the peak daily flows for the 9-month construction period have applied to each day of the two-year construction period rather than spread across the two-year construction period. This very much presents a worst-case assessment and allows for a considerable buffer in traffic movements. Further to the above, the Applicant has submitted revised trip generation calculations in the same format as the SLD calculations at Deadline 5. This document is titled 'Highways Technical Note in response to Appendix A of the SLD Deadline 4 submission' [EN010168/EXAM/9.64]. The resulting trip generation results in no uplift to the AADTs assessed within ES Volume 1 Chapter 13: Transport and Access [REP4-014]. It is therefore concluded that the Scheme still results in no significant effects in terms of transport and access.

Reference	Theme	Issue	Comments	Applicant's Response				
SLD1-004	Transport and Access	HGV Movements	Applicant's Response to SLD WR – Appendix D Transport Report [REP3-133] 3.2.2. The below comments are also informed by a meeting that took place between the Applicant's expert and on 23 June 2026. <table><tr><th>Para</th><th>Response</th></tr><tr><td>2.1.3: Weight of Mounting Structures</td><td>The Applicant clarifies that the figures within the analysis were derived from a detailed breakdown of construction activities provided by a contractor based on the draft layouts designs provided by the Applicant. However, concern is that</td></tr></table>	Para	Response	2.1.3: Weight of Mounting Structures	The Applicant clarifies that the figures within the analysis were derived from a detailed breakdown of construction activities provided by a contractor based on the draft layouts designs provided by the Applicant. However, concern is that	The Applicant has submitted revised trip generation calculations in the same format as the SLD calculations at Deadline 5. This document is titled 'Highways Technical Note in response to Appendix A of the SLD Deadline 4 submission' [EN010168/EXAM/9.64]. These calculations have now been discussed with SLD's transport consultant and clearly sets out the allowance for concrete footings.
Para	Response							
2.1.3: Weight of Mounting Structures	The Applicant clarifies that the figures within the analysis were derived from a detailed breakdown of construction activities provided by a contractor based on the draft layouts designs provided by the Applicant. However, concern is that							

Reference	Theme	Issue	Comments			Applicant's Response
				allowing 18kg per solar panel does not allow for concrete footings. No justification has been provided for this approach. The Applicant is relying on estimates provided by a potential contractor based on preliminary drawings.		
SLD1-005	Transport and Access	HGV Movements				The Applicant has submitted revised trip generation calculations in the same format as the SLD calculations at Deadline 5. This document is titled ' Highways Technical Note in response to Appendix A of the SLD Deadline 4 submission ' [EN010168/EXAM/9.64]. This sets out module densities and how they compare to other solar farm sites
			Para	Response		
			2.1.7: Calculation of Numbers of Solar Panels	The Applicant states that there will be 469 ha (1,159 acres) of panels although		

Reference	Theme	Issue	Comments		Applicant's Response
				the source of this figure is not made clear. Para. 2.10.17 of NPS EN-3 states that 2-4 acres of solar farm are required for each MW of output and a typical 50MW solar farm will consist of 100,000 to 150,000 panels covering between 125 and 200 acres. This equates to between 750 and 800 panels per acre or between 1,853 and 1,977 panels per ha. An area of 469	and the assumed densities set out in EN-3. These calculations have now been discussed with SLD's transport consultant.

Reference	Theme	Issue	Comments			Applicant's Response		
				ha would contain 927,138 panels on the basis of 800 panels per acre. The Applicant is assuming 600,000 modules. The Applicant therefore bases its calculations of transport movements on only 65% of the number of modules that would be calculated using the figures in EN-3.				
SLD1-006	Transport and Access	HGV Movements	<table><tr><td>Para</td><td>Response</td></tr></table>			Para	Response	The Applicant makes note of this comment. The comment is correct in its assumption that the 50% uplift was added to represent day-to-day variation
Para	Response							

Reference	Theme	Issue	Comments			Applicant's Response
			2.1.8 Meaning of 50% buffer:	Reference is made in the Applicant's response to the 50% buffer allowance in relation to solar panels, mounting structures, BESS containers, access track aggregate, construction machinery and equipment, removal of spoil and the CTMP as a whole. Para. 1.5.4 of the TA makes it quite clear that the 50% uplift is not to allow for increased numbers of trips		and to show the likely peak traffic generation on a single day. However, the assessment within ES Volume 1 Chapter 13: Transport and Access [REP4-014] uses the daily peak flows and therefore effectively tests a 50% uplift in total HGV movements. It is therefore important to bring this point out. In addition to the above, ES Volume 1 Chapter 13: Transport and Access (Rev 4) [REP4-037] assumes that the peak daily traffic flows will occur on every day throughout the two-year construction phase. However, as an example, the construction of Lime Down A will only last for approximately 9 months. For clarity, the peak daily flows for the 9-month construction period have applied to each day of the two-year construction period rather than spread across the two-year construction period. This very much presents a worst-case assessment and allows for a considerable buffer in traffic movements.

Reference	Theme	Issue	Comments		Applicant's Response
				but to allow for day-to-day variation in trips: "it is acknowledged that there will be small peaks throughout the construction phase, especially during preparation of the Order Limits. To account for this, a 50% uplift has been applied for the purposes of assessment". The Applicant is now saying that the 50% uplift covers underestimates of predicted trip generation. This	Further to the above, the Applicant has submitted revised trip generation calculations in the same format as the SLD calculations at Deadline 5. This document is titled 'Highways Technical Note in response to Appendix A of the SLD Deadline 4 submission' [EN010168/EXAM/9.64]. These calculations have now been discussed with SLD's transport consultant. The resulting trip generation results in no uplift to the AADTs assessed within ES Volume 1 Chapter 13: Transport and Access [REP4-014]. It is therefore concluded that the Scheme still results in no significant effects in terms of transport and access.

Reference	Theme	Issue	Comments			Applicant's Response
				would mean that what was originally a "worst case" day, is now the average day. The implication is that the worst case day would therefore require a further 50% uplift. At the meeting between experts the Applicant's transport expert did not make it clear whether or not there had been a change in the approach to the buffer but referred to aspects of the calculations where a worst		

Reference	Theme	Issue	Comments			Applicant's Response
				case had been adopted (cable route and solar PV areas constructed simultaneously, over-estimate of density of aggregate).		
SLD1-007	Transport and Access	HGV Movements				The Applicant has submitted revised trip generation calculations in the same format as the SLD calculations at Deadline 5. This document is titled ' Highways Technical Note in response to Appendix A of the SLD Deadline 4 submission ' [EN010168/EXAM/9.64]. These calculations have now been discussed with SLD's transport consultant and clearly sets out an allowance for the delivery of 270 BESS units.
			Para	Response		
			2.1.12 BESS Containers:	It is stated that each BESS could be transported as two parts, each on a standard articulated vehicle. It is stated that a reasonable worst case of 425 containers has been		

Reference	Theme	Issue	Comments		Applicant's Response
				assumed. A total of 270 BESS units would generate 540 deliveries plus 16 HGVs for cabling – 556 HGVs in total. The Applicant has not assessed a worst case and relies on the 50% uplift.	
SLD1-008	Transport and Access	BESS Foundations			The Applicant has submitted revised trip generation calculations in the same format as the SLD calculations at Deadline 5. This document is titled ' Highways Technical Note in response to Appendix A of the SLD Deadline 4 submission ' [EN010168/EXAM/9.64].
			Para	Response	
			2.1.14 Depth of BESS and Substation Foundations:	The point is made that not all of the area will require foundations so 0.3m is a reasonable average. It is	

Reference	Theme	Issue	Comments			Applicant's Response
				stated that the BESS is subject to detailed design. This introduces uncertainty into the assessment and requires a reasonable worst case that could require far more aggregate because of the need for fire water retention. The latest ES Appendix 3-1 states that foundations could be up to 12m deep (§1.2.11).		

Reference	Theme	Issue	Comments			Applicant's Response				
				Equally, applying the "reasonable average" is a failure to apply the reasonable worst case. The Applicant ought to have based calculations of depth on the worst-case scenario.						
SLD1-009	Transport and Access	Allowance for Electrical Components	<table><tr><th>Para</th><th>Response</th></tr><tr><td>2.1.16: Allowance for electrical components:</td><td>The Applicant suggests that the only components in the BESS and</td></tr></table>			Para	Response	2.1.16: Allowance for electrical components:	The Applicant suggests that the only components in the BESS and	The Applicant has submitted revised trip generation calculations in the same format as the SLD calculations at Deadline 5. This document is titled ' Highways Technical Note in response to Appendix A of the SLD Deadline 4 submission ' [EN010168/EXAM/9.64]. These calculations have now been discussed with SLD's transport
Para	Response									
2.1.16: Allowance for electrical components:	The Applicant suggests that the only components in the BESS and									

Reference	Theme	Issue	Comments			Applicant's Response
				substations are BESS units and transformers. This does not reflect the extent and complexity of the 046 Stop Lime Down Deadline 4 substation structure. Para. 1.3.1 of Appendix 3-1 [REP3-041] identifies the following components:		consultant and clearly set the allowance for BESS and substation structure and components required.
				• 400/132/33 kV power transformers and switchgear bays; • Circuit breakers, disconnectors		

Reference	Theme	Issue	Comments		Applicant's Response
				and earth switches; • High-level and low-level busbars; • 400 kV, 132 kV and 33 kV cable connection systems; and • Current transformers, voltage transformers, earthing transformers and auxiliary apparatus.	
SLD1-010	Transport and Access	HGV Movements	Para	Response	The Applicant makes note of this comment. Please see response to para 2.1.8 (SLD1-006) in relation to the comment on the 50% uplift.
			2.1.18 Allowance for	This is also assumed to be within the	

Reference	Theme	Issue	Comments			Applicant's Response				
			Conversion Units:	"buffer" of 50%. The same comments in respect of this above apply here.						
SLD1-011	Transport and Access	HGV Movements	<table><tr><th>Para</th><th>Response</th></tr><tr><td>2.1.19 Transport of Machinery and Equipment</td><td>The Applicant's response states that "no specific allowance has been made for the delivery or movement of construction machinery and equipment, as these activities are already captured within the</td></tr></table>			Para	Response	2.1.19 Transport of Machinery and Equipment	The Applicant's response states that "no specific allowance has been made for the delivery or movement of construction machinery and equipment, as these activities are already captured within the	The Applicant has submitted revised trip generation calculations in the same format as the SLD calculations at Deadline 5. This document is titled 'Highways Technical Note in response to Appendix A of the SLD Deadline 4 submission' [EN010168/EXAM/9.64]. These calculations have been discussed with SLD's transport consultant and clearly set the allowance for construction machinery and equipment. Please see response to para 2.1.8 (SLD1-006) in relation to the comment on the 50% uplift.
Para	Response									
2.1.19 Transport of Machinery and Equipment	The Applicant's response states that "no specific allowance has been made for the delivery or movement of construction machinery and equipment, as these activities are already captured within the									

Reference	Theme	Issue	Comments			Applicant's Response		
				conservative assumptions applied to HGV activity” and that an allowance for the transport of machinery and equipment also falls within the 50% “uplift.” Again, this confirms that no allowance made and, in view, the Applicant has failed to assess the reasonable worst-case scenario.				
SLD1-012	Transport and Access	HGV Movements	<table><tr><td>Para</td><td>Response</td></tr></table>			Para	Response	The Applicant has submitted revised trip generation calculations in the same format as the SLD calculations at Deadline 5. This document is titled ‘ Highways Technical
Para	Response							

Reference	Theme	Issue	Comments		Applicant's Response
			2.1.20 Construction and Removal of Compounds:	An indicative 50m x 50m compound layout is provided. has concerns that this would not work because minibuses could not get into and out of spaces, the car park has insufficient aisle width to allow cars to manoeuvre, there is no area for equipment and machinery (only delivery storage area), generator, skips/waste containers,	Note in response to Appendix A of the SLD Deadline 4 submission' [EN010168/EXAM/9.64]. These calculations have now been discussed with SLD's transport consultant and clearly set the allowance for compounds.

Reference	Theme	Issue	Comments			Applicant's Response
				fuel storage, wheel washing or a compactor		
SLD1-013						The Applicant has submitted revised trip generation calculations in the same format as the SLD calculations at Deadline 5. This document is titled 'Highways Technical Note in response to Appendix A of the SLD Deadline 4 submission' [EN010168/EXAM/9.64] . These calculations have now been discussed with SLD's transport consultant and clearly set the allowance for spoil.
			Para	Response		
			2.1.22 Spoil:	The Applicant suggests that all spoil will remain within the site, but also that traffic movements on account of spoil will be assessed within the 50% uplift. At the meeting it was stated that the assumption		

Reference	Theme	Issue	Comments		Applicant's Response
				was that 10% of the 139,666m3 of excavated soil would be removed and that there would be no backfilling of aggregate vehicles. This, by itself, would require around 700 HGVs (1,400 HGV movements).	
SLD1-014	Transport and Access	Off-Site Highway Works			The Applicant makes note of this comment. The Applicant has prepared and submitted a Permitted Preliminary Works Environmental Management Plan at Deadline 5 to address this point.
			Para	Response	
			2.1.24 Off-site Highway Works:	It is stated that off-site highway works	

Reference	Theme	Issue	Comments			Applicant's Response
				would be completed before the construction period. This suggests that there has been no assessment of the potential impact of these works within the Applicant's transport assessment, notwithstanding those being a clear effect of the Scheme		

Reference	Theme	Issue	Comments		Applicant's Response
SLD1-015	Transport and Access	HGV Types	Para	Response	The Applicant makes note of this comment. However, the HGV movements associated with the Network Rail site are considered relevant and clearly set out a baseline president for the use of Alderton Road and the Fosse Way.
			2.1.28 HGV Types:	Reference is made to the HGV movements associated with the Network Rail site and it is suggested that HGVs have used the Fosse Way "without issue". It is not known whether this has been the case. Those works are associated	

Reference	Theme	Issue	Comments			Applicant's Response
				with a single compound.		
SLD1-016	Transport and Access	Substation Construction Period				The Applicant has submitted revised trip generation calculations in the same format as the SLD calculations at Deadline 5. This document is titled ' Highways Technical Note in response to Appendix A of the SLD Deadline 4 submission' [EN010168/EXAM/9.64].
			Para	Response		
			2.1.30 400kV Substation Construction Period:	It is stated that the 6-month construction timetable is adopted as a "worst case" for the construction of this substation. This is not the case because, if the period were longer, it would lead to cumulative		

Reference	Theme	Issue	Comments			Applicant's Response
				impacts with Lime Down E. A simple internet search elicits the response "2.5-3.5 years" for the construction of such a substation. At the meeting the 048 Stop Lime Down Deadline 4 transport expert conceded that the timescale for the 400kV substation construction would likely be similar to		

Reference	Theme	Issue	Comments			Applicant's Response
				the BESS, around 2 years. This means that the 400kV substation will be constructed concurrently with Lime Down D and E and the BESS.		
SLD1-017	Transport and Access	HGVs on Fosse Way				The Applicant makes note of this comment.
			Para	Response		
			2.1.34 Chances of HGVs meeting on Fosse Way:	It is suggested that there would be a 1 in 8 chance of HGVs meeting on the 3.1km		

Reference	Theme	Issue	Comments			Applicant's Response
				section of road between Grittleton and the access to Lime Down C. A vehicle travelling at 25mph (40kph) takes 4.65 minutes to travel 3.1km. If there are 5 HGVs travelling south and 6 HGVs travelling south there would be, on average 2.3HGVs meeting		

Reference	Theme	Issue	Comments			Applicant's Response
				every hour. It was agreed at the meeting that calculations would be exchanged with a view to agreeing the level of interaction. Following discussions between the transport experts, it was agreed that a figure of 2.3 HGVs meeting per hour is correct.		

Reference	Theme	Issue	Comments		Applicant's Response
SLD1-018	Transport and Access	HGVs on Road to Bradfield Cottages	Para	Response	The Applicant makes note of this comment.
			2.1.35 Chances of HGVs meeting on Road to Bradfield Cottages:	It is suggested that there would be a 1 in 26 chance of HGVs meeting on the 0.98km section of road between The Street, Hullavington to Lime Down D. A vehicle travelling at 25mph (40kph) takes 1.47 minutes to travel	

Reference	Theme	Issue	Comments			Applicant's Response
				0.98km. If there are 3 new HGVs and 7 existing HGVs travelling in the opposite direction, there will be one HGV every 6 minutes. There would be, on average, 1.7HGVs meeting every hour. The length of constrained road is more than 0.98km since it		

Reference	Theme	Issue	Comments			Applicant's Response
				extends around the bends to the south of The Street. It was agreed at the meeting that calculations would be exchanged with a view to agreeing the level of interaction. Following discussions between the transport experts, it was agreed that the figure of 1.7 HGVs meeting per		

Reference	Theme	Issue	Comments			Applicant's Response
				hour is correct.		
SLD1-019	Transport and Access	Access to Lime Down E				The Applicant makes note of this comment. The use of tractor and trailer seeks to minimise impacts by removing HGVs on the links in Lime Down E.
			Para	Response		
			2.1.37 Access to Area E south of Railway:	It is stated that all transport of materials and equipment to areas south of the railway would be by tractor and trailer. It is not clear how items such as compound construction, the delivery of large machinery etc, could be achieved in this way. It would also		

Reference	Theme	Issue	Comments		Applicant's Response				
				mean that the number of vehicle movements would be greatly increased, thus increasing the impacts on users of the lanes and rights of way					
SLD1-020	Transport and Access	Traffic Management and Monitoring Systems	<table><tr><th>Para</th><th>Response</th></tr><tr><td>2.1.39 Traffic Management and Monitoring System ("TMMS"):</td><td>It is stated that a TMMS will be "considered" for implementation as part of the final CTMPs. If the</td></tr></table>		Para	Response	2.1.39 Traffic Management and Monitoring System ("TMMS"):	It is stated that a TMMS will be "considered" for implementation as part of the final CTMPs. If the	The Traffic Management and Monitoring System (TMMS) is set out in the Outline CTMP which is secured Confirmation of the Traffic Management and Monitoring system will be agreed as part of the final CTMP. The preparation, approval and implementation of the final CTMPs, substantially in accordance with the Outline CTMP [REP4-057] , are secured through Requirement 15 of Schedule 2 of the Draft DCO [REP4-004] .
Para	Response								
2.1.39 Traffic Management and Monitoring System ("TMMS"):	It is stated that a TMMS will be "considered" for implementation as part of the final CTMPs. If the								

Reference	Theme	Issue	Comments		Applicant's Response				
				TMMS is considered to be essential to mitigate the adverse impacts of construction traffic, the Applicant should commit to delivering an effective TMMS.					
SLD1-021	Transport and Access	Visibility	<table><tr><th>Para</th><th>Response</th></tr><tr><td>2.1.44 Forward Visibility along Road East of Hullavington:</td><td>Reference is made to Drawing 51A. The intervisibility distances do not demonstrate</td></tr></table>		Para	Response	2.1.44 Forward Visibility along Road East of Hullavington:	Reference is made to Drawing 51A. The intervisibility distances do not demonstrate	Updated swept-path drawings and road width drawing showing geometries and proposed highway improvements are provided in Annex I and K of ES Volume 3 Appendix 13-1: Transport Assessment (Rev 4) [REP4-037] . These drawings have been undertaken using topographical survey data and demonstrate regular opportunities for two HGVs to pass on the proposed construction routes. The Applicant has issued SLD and WC with 'flattened'
Para	Response								
2.1.44 Forward Visibility along Road East of Hullavington:	Reference is made to Drawing 51A. The intervisibility distances do not demonstrate								

Reference	Theme	Issue	Comments		Applicant's Response
				that HGVs will not meet on narrow sections. At the meeting it was requested that the Applicant forward separate files showing swept paths of vehicles on the narrow sections of road. The latest drawings cannot be interrogated because the file crashes and the topographical survey lines	versions of the pdf drawings prior to Deadline 5. This should make the drawings easier to view.

Reference	Theme	Issue	Comments			Applicant's Response
				are too thick to allow relative locations to be judged with confidence. A further site visit has been undertaken to measure road widths and intervisibilities where the applicant suggests that HGVs can safely pass. This confirms that the current plans do not provide sufficient confidence		

Reference	Theme	Issue	Comments			Applicant's Response
				that construction vehicles can safely use the proposed routes.		
SLD1-022	Transport and Access	Road Safety				The accident study included in ES Volume 1, Chapter 13: Transport and Access (Rev 4) [REP4-014] takes account of this. It was concluded that the low level of construction traffic associated with the Cable Route Corridor is unlikely to materially affect road safety on this link, and the effects on accidents and safety from the Scheme's construction phase will be temporary and negligible (not significant).
			Para	Response		
			2.1.45 Accident Blackspots	SLD identifies two locations yet only one is discussed in the Applicant's response. The cluster of accidents at the junction of Sheldon Corner with the A420 is not discussed.		

Reference	Theme	Issue	Comments		Applicant's Response
SLD1-023	Transport and Access	Acton Turville School	Para	Response	The Applicant makes note of this comment. However, the school is not adjacent to the construction route and is located on the opposite side of the village. The construction access routes do not pass Acton Turville School. The construction access routes show vehicles routing from the A46 to the west towards Acton Turville on the B4040 and through it via the B4039/Burton Road. Construction vehicles do not turn onto Littleton Drew Road where Acton Turville Primary School is located. The school is over 250m along Littleton Drew Road from the junction with the construction route The B4039 already accommodates HGV traffic, and the medium classification of the link is considered appropriate.
			2.1.46 School Acton Turville:	The Applicant excludes the school since the route does not pass it directly. There will, however, be children crossing the construction route to and from the school. A site visit confirmed that school pupils do cross the B4039 in Acton Turville. An	

Reference	Theme	Issue	Comments			Applicant's Response
				elderly resident was also observed crossing in both directions.		
SLD1-024	Transport and Access	B4039				The Applicant makes note of this comment. An increase in HGV traffic is recognised in ES Volume 1, Chapter 13: Transport and Access (Rev 4) [REP4-014] and is taken for further assessment as per the methodology.
			Para	Response		
			2.1.48 Burton:	It is stated that the B4039 is already well used by HGVs. This fails to recognise the fact that against this relatively high baseline, the proposed development will lead to at		

Reference	Theme	Issue	Comments			Applicant's Response
				least a 100% increase in daily HGVs		
SLD1-025	Transport and Access	Road Width and Sensitivity				The Applicant makes note of this comment. The ISEP guidance does not define sensitivity by road geometry, instead it focuses on people and land use affected by traffic. Road width is a physical road characteristic so is not considered in the receptor sensitivity but is considered under magnitude of impact and baseline conditions. Put simply, sensitivity is defined by who is affected and magnitude is how big the change is.
			Para	Response		
			3.2.2 Road Width and Sensitivity:	The Applicant states that road width is not considered in receptor sensitivity. Paragraph 2.7 of the ISEP Guidelines states: "2.7 The perception, experience and health effects of changes in traffic by humans, and the impact of		

Reference	Theme	Issue	Comments			Applicant's Response
				traffic changes on various ecological systems will also vary according to such factors as: • Existing traffic levels • The location of traffic movements • The time of day • Temporal and seasonal variation on traffic • Design and layout of the road and pavement		

Reference	Theme	Issue	Comments			Applicant's Response
				• crossing points • Landscape/to wnscape character. Designated status, land use and activities adjacent to the route • Ambient conditions of adjacent land uses." This confirms the obvious point that the sensitivity of vulnerable road users does depend upon the characteristics of the road or		

Reference	Theme	Issue	Comments			Applicant's Response
				footway. At the meeting the Applicant's transport expert stated that road width was allowed for in the magnitude of impact. does not agree with this approach. Where changes in the magnitude of flows (either total flows or HGV flows) exceed the thresholds set out in the ISEP Guidance (Rules 1 and 2) it is necessary to consider the		

Reference	Theme	Issue	Comments		Applicant's Response
				impact on sensitive receptors and the sensitivity of those receptors to changes in flows will depend, to some extent, on the nature of the road environment.	
SLD1-026	Transport and Access	Sensitivity of B Roads	Para	Response	Acton Turville and Burton are both located on the B4039 and already well used by existing HGVs. The medium classification of the link is considered appropriate.
			3.2.5 Sensitivity of B Roads:	The Applicant states that B roads are classified as having low sensitivity except in the CNL or through	

Reference	Theme	Issue	Comments			Applicant's Response
				residential areas. Both Acton Turville and Burton are residential areas and both are sensitive to changes in traffic flows (vulnerable highway users, narrow or absent footways, lack of pedestrian crossings) yet these areas have not been avoided.		
SLD1-027	Transport and Access	Vulnerable Users	Para	Response		The Applicant will undertake updated NMU surveys following ISH 3. The Applicant intends to submit the results at Deadline 6.
			3.2.6 Vulnerable Users:	The Applicant confirms that the		

Reference	Theme	Issue	Comments			Applicant's Response
				assessments have been undertaken on the basis that "there was not a large concentration of vulnerable users on the construction access routes." SLD has produced evidence in respect of vulnerable road users, and has observed such road users when on site visits. has concerns that this substantially underplays		

Reference	Theme	Issue	Comments			Applicant's Response		
				the presence of such users. The Applicant's surveys of vulnerable highway users have been undertaken at non-representative times and, following discussions at ISH3, the Applicant proposes to repeat the surveys over the summer				
SLD1-028	Transport and Access	Severance	<table><tr><td>Para</td><td>Response</td></tr></table>			Para	Response	The Applicant makes note of this comment. There are no predictive formulae which give simple relationships between traffic factors and levels of significance. Nevertheless, there are a
Para	Response							

Reference	Theme	Issue	Comments			Applicant's Response
			3.2.10 Severance:	The Applicant quotes the definition of severance in the ISEP Guidelines (at §3.13): "the perceived division that can occur within a community when it becomes separated by major transport infrastructure" that "separate people from places and other people". The Applicant goes on to state that severance is to do with		range of indicators for determining the significance of the relief from severance. The ISEP Guidelines (Ref 13-1) state "changes in traffic flow of 30%, 60% and 90% are regarded as producing slight, moderate and substantial changes in severance respectively" (Paragraph 3.16). Changes in total traffic flows on all roads taken forward for further assessment are below 30%, which relates to a 'slight' change in 'severance' in line with Paragraph 3.16 on the ISEP guidelines. The guidance also suggests "very low baseline flows are unlikely to experience severance impacts even with high percentage changes in traffic".

Reference	Theme	Issue	Comments			Applicant's Response		
				gaps between vehicles and is not, therefore affected by HGVs. The Applicant has overlooked the clear requirement to consider the "perceived division that can occur". The Applicant has therefore failed to undertake an acceptable assessment.				
SLD1-029	Transport and Access	Non-Motorised Users	<table><tr><td>Para</td><td>Response</td></tr></table>			Para	Response	The Applicant makes note of this comment. The two surveys provide a good understanding of NMU usage throughout different periods of the year. This is relevant as the construction
Para	Response							

Reference	Theme	Issue	Comments		Applicant's Response
			3.2.15 NMU Amenity/ Fear and Intimidation:	The Applicant dismisses this on the basis that there are "low numbers of NMU movements". At the meeting requested the raw data from the recent NMU surveys. The transport expert stated that the recent surveys confirmed the findings of the January 2024 surveys. SLD has set out its concerns in respect of the NMU surveys in its post-hearing submissions	phase will take place over two years and through all seasons. The Applicant intends to submit further NMU data and analysis at Deadline 6 further to the ExA's request.

Reference	Theme	Issue	Comments			Applicant's Response
				for ISH3 above. The Applicant agreed at ISH3 to retake these surveys.		
SLD1-030	Transport and Access	Highway Code				While there would be a small margin between the vehicle nearside edge, it has been demonstrated that passing places are available within the usable carriageway width for pedestrians. In addition, the Outline CTMP (Rev 4) [REP4-057] provides for road traffic condition surveys and rectification of any damage caused by construction traffic. The inclusion of key highway links requested by WC have been included in Section 6.12. The Applicant is therefore bound by Requirement 15 in Schedule 2 to the Draft DCO [REP4-004] to rectify any damage to the highways. As accepted by WC it is also considered that pedestrians will be able to use suitable flat verges where available
			Para	Response		
			3.3.4 Highway Code	The Applicant presents an interpretation of the safe passing widths for NMU/HGVs. The Applicant adopts the same dimensions as adopted by but omits to allow any clearance between the		

Reference	Theme	Issue	Comments		Applicant's Response
				off-side edge of the HGV and the side of the road. This is not safe. If the HGV allow any clearance the minimum safe margins around the NMU are reduced.	
SLD1-031	Transport and Access	PRoW Measures	Para	Response	The Applicant makes note of this comment. The text should refer to paragraph 7.18 of SLD's Transport Report at Appendix D of SLD's WR [REP1-172].
			3.4.1 PRoW Measures:	The Applicant's reference does not correspond to the content of SLD's Transport Report (at	

Reference	Theme	Issue	Comments			Applicant's Response
				Appendix D of SLD's WR [REP1-172]).		
SLD1-032	Transport and Access	HGV Numbers				Chapter 13: Transport and Access [REP4-037] assumes that the peak daily traffic flows will occur on every day throughout the two-year construction phase. However, as an example, the construction of Lime Down A will only last for approximately 9 months. For clarity, the peak daily flows for the 9-month construction period have applied to each day of the two-year construction period rather than spread across the two-year construction period. This very much presents a worst-case assessment and allows for a considerable buffer in traffic movements, which would also Further to the above, the Applicant has submitted revised trip generation calculations in the same format as the SLD calculations at Deadline 5. This document is titled ' Highways Technical Note in response to Appendix A of
			Para	Response		
			3.5.2 HGV Trip Numbers:	It is stated that the calculation of construction vehicle numbers assumes that all solar PV sites and the cable route corridor are constructed concurrently. This is not correct since the cable route trips are not accounted for on the routes where they		

Reference	Theme	Issue	Comments		Applicant's Response
			combine with PV traffic. The Applicant will provide details to explain how the cumulative impact has been assessed.		the SLD Deadline 4 submission' [EN010168/EXAM/9.64]. The resulting trip generation results in no uplift to the AADTs assessed within ES Volume 1 Chapter 13: Transport and Access (Rev 4) [REP4-037]. It is therefore concluded that the Scheme still results in no significant effects in terms of transport and access.
SLD1-033	Transport and Access	Cumulative Impact	Para Response 3.5.3 Cumulative Impact: It is stated that the calculation of construction vehicle numbers assumes that all solar PV sites and the cable route corridor are		ES Volume 1, Chapter 13: Transport and Access [REP4-037] assumes that the peak daily traffic flows will occur on every day throughout the two-year construction phase. However, as an example, the construction of Lime Down A will only last for approximately 9 months. For clarity, the peak daily flows for the 9-month construction period have applied to each day of the two-year construction period rather than spread across the two-year construction period. This very much presents a worst-case assessment and allows for a

Reference	Theme	Issue	Comments		Applicant's Response
				constructed concurrently. This is not correct since the cable route trips are not accounted for on the routes where they combine with PV traffic. The Applicant will provide details to explain how the cumulative impact has been assessed.	considerable buffer in traffic movements, which would also make allowance for trips associated with the Cable Route Corridor. Further to the above, the Applicant has submitted revised trip generation calculations in the same format as the SLD calculations at Deadline 5. This document is titled 'Highways Technical Note in response to Appendix A of the SLD Deadline 4 submission' [EN010168/EXAM/9.64]. The resulting trip generation results in no uplift to the AADTs assessed within ES Volume 1 Chapter 13: Transport and Access (Rev 4) [REP4-037]. It is therefore concluded that the Scheme still results in no significant effects in terms of transport and access.
SLD1-034	Transport and Access	HGV Trip Calculations	Para	Response	The Applicant makes note of this comment. All access tracks are all

Reference	Theme	Issue	Comments			Applicant's Response
			Table 3-1 HGV Trip Calculations:	It is stated that a compactor will be provided on site. The latest Outline CEMP ([REP3-093], p.67) states that waste compactors will be located within each solar PV site. It is stated that some compound material will be retained on site for maintenance access tracks. No access tracks are identified connecting the maintenance access points		clearly included as elements of the site within the trip generation calculations. The applicant maintains that spoil will only be removed from site if it is contaminated and the Applicant has included a 10% allowance for this within the trip generation calculations. Further to the above, the Applicant has submitted revised trip generation calculations in the same format as the SLD calculations at Deadline 5. This document is titled 'Highways Technical Note in response to Appendix A of the SLD Deadline 4 submission' [EN010168/EXAM/9.64]. The resulting trip generation results in no uplift to the AADTs assessed within ES Volume 1 Chapter 13: Transport and Access (Rev 4) [REP4-037]. It is therefore concluded that the Scheme still results in no significant effects in terms of transport and access.

Reference	Theme	Issue	Comments			Applicant's Response
				with the solar array areas. If tracks are to be laid, they should be included as elements of the site. The "general" category includes compounds, waste, spoil, fencing and landscaping. It appears to be a "catch-all" for anything that has been overlooked. It is stated that spoil will only be removed from site if it is contaminated. This has not been		

Reference	Theme	Issue	Comments			Applicant's Response
				suggested before and does not appear to be consistent with other statements about the possibility of spoil being removed from site.		
SLD1-035	Transport and Access	Non-Motorised User Surveys				The Applicant makes note of this comment. The two surveys provide a good understanding of NMU usage throughout different periods of the year. This is relevant as the construction phase will take place over two years and through all seasons. The Applicant intends to submit further NMU data and analysis at Deadline 6 further to the ExA's request.
			Para	Response		
			3.6.2 NMU Surveys:	It is stated that the Applicant has undertaken its own surveys of NMU on Alderton Road, Fosse Way,		

Reference	Theme	Issue	Comments			Applicant's Response
				unnamed road opposite The Street and Rodbourne. See comments above.		
SLD1-036	Transport and Access	Outline CTMP	Outline Construction Traffic Management Plan [REP3-109] 3.2.3. At Deadline 3, the Applicant submitted an updated outline construction traffic management plan [REP3-109]. 3.2.4. Para. 2.2.10 states that all solar PV accesses will be retained in their altered state/size. This may lead to difficulties as the site accesses generally comprise wide areas of hard surfacing that will be treated as informal lay-bys, encouraging drivers to pull into places that may not be appropriate for parking.			The Applicant makes note of this comment. Any driver parking in or obstructing an access will be causing a highway obstruction offence.

Reference	Theme	Issue	Comments	Applicant's Response
SLD1-037	Transport and Access	Acton Turville School	3.2.5. Para. 3.2.7 states that deliveries to and from access points 123 to 127 (Gastard to Melksham substation) will avoid school start and finish times. This appears to be to avoid impacting on the Shaw Primary School that is located on the eastern side of the A365 south of Whitley. Para. 3.4.3 states that workers will also be advised not to travel past the school at start and finish times. The Applicant has not, however, sought to avoid routeing HGVs through Acton Turville at school finishing times.	The Applicant makes note of this comment. However, unlike the school in Shaw, the school in Acton Turville is not located adjacent to the construction route and is located on the opposite side of the village. The construction access routes do not pass Acton Turville School. The construction access routes show vehicles routing from the A46 to the west towards Acton Turville on the B4040 and through it via the B4039/Burton Road. Construction vehicles do not turn onto Littleton Drew Road where Acton Turville Primary School is located. The school is over 250m along Littleton Drew Road from the junction with the construction route.
SLD1-038	Transport and Access	HGV Management	3.2.6. In respect of HGV management, §4.7.2 states that incoming vehicles would contact the site manager when approaching the site and departing HGVs would be held back. This would mean that HGVs would need to be held back from all compounds that were operational at the time. This significantly increases the logistical difficulties in	The Applicant makes note of this comment. The logistics of deliveries will be internally communicated and managed by the site managers.

Reference	Theme	Issue	Comments	Applicant's Response
			implementing an effective HGV management system.	
SLD1-039	Transport and Access	HGV Holding Locations	3.2.7. In respect of HGV holding locations, figure 4.3 now shows possible holding locations on construction routes. These include two lay-bys on the B4044/B4039 route. These are relatively small lay-bys. If one other vehicle is in the lay-by the HGV would not be able to stop. This is likely to lead to HGVs pulling into inappropriate places. Two lay-bys are identified on the A429 just north of the M4 Junction 17. These are larger but would also become inaccessible if a small number of other vehicles were using the lay-bys. There are 13 Google Maps image of the northbound lay-by and every image shows the lay-by being used by at least 1 vehicle and often many more. There are 14 Google Maps images of the southbound lay-by and all show more than 1 vehicle parked in the lay-by. Leigh Delamere services is identified. This would not be viable for many journeys. An HGV travelling west on the	The Applicant makes note of this comment and maintains that a holding area for traffic travelling to the site the site is not required as exiting vehicles can be held back if required. However, the Applicant has identified areas that can be used, which are considered within a workable and manageable distance of the site. The final details of proposed holding areas will be confirmed as part of the final Outline CTMP.

Reference	Theme	Issue	Comments	Applicant's Response				
			M4 would be 20 miles from Areas A, B and C, and 25 miles from Areas D and E. The holding locations would not guarantee that HGVs could successfully and safely stop. At the meeting the Applicant's transport expert stated that the main location to hold HGVs would be the M4 services, which raises the concerns set out above.					
SLD1-040	Transport and Access	Depth of BESS and Substation Access Tracks	Applicant's Response to Comments Received at Deadline 2 [REP3-129] <table><tr><th>Para</th><th>Response</th></tr><tr><td>WCD1-087 Depth of BESS and Substation Access Tracks</td><td>The depth will vary between 0.35 and 0.65m depending on soil conditions. A depth of 0.5m has been used as a "reasonable assumption". It is not, however, a likely worst</td></tr></table>	Para	Response	WCD1-087 Depth of BESS and Substation Access Tracks	The depth will vary between 0.35 and 0.65m depending on soil conditions. A depth of 0.5m has been used as a "reasonable assumption". It is not, however, a likely worst	The Applicant has submitted revised trip generation calculations in the same format as the SLD calculations at Deadline 5. This document is titled 'Highways Technical Note in response to Appendix A of the SLD Deadline 4 submission' [EN010168/EXAM/9.64]. This includes information on the assumed based depths.
Para	Response							
WCD1-087 Depth of BESS and Substation Access Tracks	The depth will vary between 0.35 and 0.65m depending on soil conditions. A depth of 0.5m has been used as a "reasonable assumption". It is not, however, a likely worst							

Reference	Theme	Issue	Comments			Applicant's Response
				case assumption		
SLD1-041	Transport and Access	Vulnerable Road Users				The Applicant confirms that the January 2024 surveys did not include any bank holidays. The Applicant intends to submit further NMU data and analysis at Deadline 6 further to the ExA's request.
			Para	Response		
			WCWR-038 Impact on Vulnerable Road Users	The TRICS database and National Travel Survey have been used to estimate the number of walk trips on Bradfield Cottages (17 per day). Although this methodology identifies the likelihood that there would be walking trips, no judgement is made as to the impact of		

Reference	Theme	Issue	Comments			Applicant's Response
				construction vehicles on them. It is suggested that surveys of cyclists on Bradfield Cottages in January 2024 included bank holiday peaks. This appears mistaken (unless it included the New Year Bank Holiday), and is also in the depths of winter.		
SLD1-042	Ecology and Biodiversity	Outline EPMS	3.3.Ecology and Biodiversity Outline Ecological Protection and Mitigation Strategy [REP3-103] 3.3.1. A recurring question from the ExA during the hearing, raised when referring to the lack of species-specific			The Applicant notes this comment regarding the ExA's questioning during the hearing.

Reference	Theme	Issue	Comments	Applicant's Response
			surveys within the CRC in favour of a mitigation-based approach with input from general habitat condition and desk-based data, was: (outside of encountering EPS species) where works cannot proceed without securing a licence beforehand, what are the risks and issues with proceeding under this EcoCoW-led mitigation basis?	
SLD1-043	Ecology and Biodiversity	Impact and Mitigation	3.3.2. Two important considerations arise: practical limitations in being able to effectively identify and address sources of impact (and, therefore adjust the mitigation measures accordingly even when carrying these out within individual 'microsites'), and limitations, oversights or inadequacies with the current schedule of mitigation measures of this approach.	The Applicant notes this comment and provides response to the considerations raised by Stop Lime Down in the relevant responses below.
SLD1-044	Ecology and Biodiversity	Ecological Impact	3.3.3. Limitations identifying sources of ecological impact: As already raised during the hearing, the most obvious limitation of a pre-clearance lead approach is the relatively short amount of time afforded to data gathering, often	The Applicant notes this comment relating to pre-clearance checks and Stop Lime Down's concerns relating to seasonal and weather-related constraints. The Applicant provides

Reference	Theme	Issue	Comments	Applicant's Response
			limited to a single site inspection shortly prior to construction works commencing. This approach is susceptible to changes in seasonal behaviour for different species being monitored, as well as effects of weather conditions.	response to these issues in the below response SLD1-045.
SLD1-045	Ecology and Biodiversity	Impact and Mitigation	3.3.4. Weather in particular can have a significant impact on the effectiveness of individual searches. Rainfall, even within the days directly preceding the inspection, can wash away critical identification features such as tracks, feeding remains and droppings. Temperatures and sunlight will instead dictate the times of day where reptile basking behaviour, concealment or torpor will be at their highest. A mitigation decision (such as trench route selection, in the case of the proposal) informed exclusively by a brief inspection under outlier weather/seasonal conditions for a particular species can result in disproportionate impacts and/or legal infractions during works.	Details of proposed construction-phase mitigation measures are set out within the Outline Ecological Protection and Mitigation Strategy [REP4-055], including pre-commencement surveys and pre-clearance checks. For several species, such as otter, water vole and badger, pre-commencement surveys are proposed to inform detailed design and micro-siting of the cable. These surveys will be undertaken prior to the commencement of construction works and will be undertaken during optimal weather conditions and with consideration of potential seasonal constraints to ensure the findings are suitably robust to inform detailed design. If required, multiple survey visits may be undertaken, if limitations are identified during the initial survey. Further details

Reference	Theme	Issue	Comments	Applicant's Response
				of pre-commencement survey timings and methodologies will be provided in the detailed Ecological Protection and Mitigation Strategy, to be secured via DCO requirements. For further species, including birds, dormice, and reptiles, pre-clearance checks immediately preceding construction works are proposed. Pre-clearance checks are a widely recognised construction-phase measure designed to determine the presence/absence of protected species within a particular area, i.e. a section of hedgerow to be removed, at the time of construction in order to avoid direct impacts such as injury/killing of individuals or destruction/disturbance of resting places, that may contravene wildlife legislation. Consideration would be given to the seasonal timing of pre-clearance checks by the EcoCoW and how this may affect animal behaviour. The impact of weather on these checks is likely to vary between species – for example, heavy rain would not

Reference	Theme	Issue	Comments	Applicant's Response
				significantly impact the ability of a surveyor to identify a flock of wintering birds within a grassland field but may impact the likelihood of identifying nesting behaviour during a check for breeding bird activity. The appointed EcoCoW would be suitably experienced to identify such limitations, and allowances exist within the construction programme to delay pre-clearance checks until weather conditions are suitable. The Applicant is aware of the risk of delay associated with adopting pre-clearance checks as a mitigation measure and will respond appropriately to weather conditions under guidance from the EcoCoW to ensure pre-clearance checks are not limited in their efficacy and ensure wildlife legislation is not contravened.
SLD1-046	Ecology and Biodiversity	Off-Site Impacts	3.3.5. Another major limitation, raised during the hearing, is in fully identifying and addressing off-site impacts. In the case of the Applicant's proposal, and the CRC in particular, the features where this would be most relevant	The Applicant notes this comment relating to the assessment of potential off-site impacts, in relation to the Cable Route Corridor in particular. The potential impacts of fragmentation, pollution and habitat degradation, which

Reference	Theme	Issue	Comments	Applicant's Response
			would be hedgerows, tree lines and watercourses, which form part of a wider linking parcels of woodland, streams, ditches and ponds within the wider landscape. Possible example of sections which link potentially sensitive features east and west of the corridor include crossing points: 23, 25, 26, 27, 31, 34, 35, 38, 40 in the Hedgerow Removal Plans rev A [REP3-103]. 3.3.6. An example of where this limitation becomes apparent can be seen within the Applicant's precautionary avoidance approach to ditches within the CRC (see §7.5.1 of [REP3-103]. The decision as to whether use HDD or not to avoid impacts will rely on factors such as identifying a protected species which would be impacted.	are considered most likely to result in impacts to habitats and species present in the landscape immediately surrounding the Order Limits, are assessed in Chapter 9: Ecology and Biodiversity [REP4-010]. Measures to avoid and mitigate for potential impacts of habitat fragmentation within the Zone of Influence of the Scheme, as defined in Paragraph 9.5.2 of ES Chapter 9 : Ecology and Biodiversity [REP4-010], include avoidance of habitat loss, e.g. through use of existing hedgerow gaps for access tracks, minimising width of crossings where habitat loss is required, and protection of potential commuting corridors through implementation of protective buffers during construction and within Scheme design. Construction-phase measures and management of connective corridors during operation (at the Solar PV Sites) are set out within the Outline EPMS [REP4-055] and Outline LEMP [REP3-100]. In relation to the Cable Route Corridor, impacts to connectivity within the wider

Reference	Theme	Issue	Comments	Applicant's Response
				landscape have potential to arise primarily through loss of linear habitat such as hedgerows. The majority of hedgerow losses within the Cable Route Corridor will be reinstated following the completion of cable works, and any associated impacts on off-site receptors have therefore been considered temporary. The assessment of hedgerow impacts accounts for the delay in hedgerow establishment following re-planting, and a significant adverse effect on hedgerows at the Local level anticipated in the short to medium term is transparently reported in Chapter 9: Ecology and Biodiversity [REP4-010]. Measures for temporary habitat removal and reinstatement within the Cable Route Corridor are set out within Method Statement 7 of the Outline EPMS [REP4-055] and include measures to avoid potential impacts to protected species, include off-site impacts resulting from sediment release, flooding etc., arising from open cut trenching of ditches. Pollution

Reference	Theme	Issue	Comments	Applicant's Response
				prevention measures are also set out within Method Statement 3 of the Outline EPMS [REP4-055] .
SLD1-047	Ecology and Biodiversity	Search Area	3.3.7. While preliminary habitat appraisal within the CRC has accounted for a wider buffer than required, due to the linear nature of the cable works these can only account for limited sections of a particular ditch being crossed over. While these can be searched to identify protected species, it would not be able to directly observe or identify sensitive species located further downstream, and therefore gauge whether standard good practice sediment/silt trapping alone would be appropriate over more specialised measures or avoidance entirely.	The Applicant notes this comment. Pre-commencement surveys for riparian species are proposed to search for signs of protected and notable species within the watercourse network within the Cable Route Corridor, alongside other construction-phase mitigation measures set out within the Outline Ecological Protection and Mitigation Strategy [REP4-055]. Surveys for riparian mammals will comprise inspection of accessible habitat at least 50m upstream and downstream of the proposed crossing location, as set out within Method Statement 9. Further to the pre-commencement surveys, including of sections of the watercourse upstream or downstream potentially outside of the Order Limits, the mitigation measures for riparian species have been proposed on a precautionary basis assuming presence of protected and notable species in

Reference	Theme	Issue	Comments	Applicant's Response
				areas of suitable habitat. The Applicant therefore considers confirmation of species presence up or downstream of the proposed crossing location would not materially alter the impact assessment, the avoidance and mitigation strategy, or the conclusions of ES Volume 1 Chapter 9: Ecology and Biodiversity [REP4-010]. For aquatic / riparian species under Natural England's remit for which licences may be required (namely GCN, white-clawed crayfish, water voles and otters), the approach to these species has been agreed between the Applicant and Natural England as reflected in the Statement of Common Ground with Natural England [REP4-064].
SLD1-048	Ecology and Biodiversity	Ditches	3.3.8. Similarly, the approach opens itself to a risk of underestimating the value of individual, seasonally wet ditches; atypical weather patterns can result in a dry condition for a ditch that is otherwise a critical commute route or breeding feature.	Ditches within the Order Limits have been surveyed under UKHabitat Classification methodology and assessed for Biodiversity Net Gain calculations. As set out within The Statutory Biodiversity Metric User Guide (last updated July 2026), ditches are classified as 'wet' ditches and therefore

Reference	Theme	Issue	Comments	Applicant's Response
				recorded within the watercourse tab of the Statutory Biodiversity Metric under the following definition: <i>'(features) which are less than 5 metres wide; and are likely to retain water for more than 4 months of the year'</i>. The potentially for ditches to comprise seasonally wet features has therefore been considered during baseline surveys, with connectivity to the wider watercourse network, presence of aquatic plants, and composition of in-channel vegetation used to determine whether a feature is likely to hold water for more than 4 months. It is considered unlikely that ditches that do not meet the criteria for classification as a wet ditch comprise critical commuting or breeding features for riparian species, particularly species such as white-clawed crayfish and water vole which typically require consistent water levels throughout the year. It is recognised however that dry or seasonally wet ditches can still provide

Reference	Theme	Issue	Comments	Applicant's Response
				commuting features, particularly for species such as otter. The Applicant does therefore not consider that the evaluation of importance for ditches, and their potential to support protected and notable species, presented in Chapter 9: Ecology and Biodiversity [REP4-010], underestimates the value ditches within the Order Limits.
SLD1-049	Ecology and Biodiversity	Mitigation	3.3.9. Limitations with current schedule of mitigation measures: It is important to caveat that comments on the adopted mitigations are significantly constrained by the lack of baseline data available for many species of conservation interest; depending on actual levels of activity, population size and species presence across the various work areas, it may be that some of the working approaches and measures being proposed are still adequate and proportionate to the actual degree of risks present. By the same token, it may be that measures that would be otherwise reasonable and proportionate for similar works	The Applicant notes this comment. The Applicant considers the embedded and additional mitigation measures proposed in Chapter 9: Ecology and Biodiversity [REP4-010] and detailed within Outline Ecological Protection and Mitigation Strategy [REP4-055] to be sufficiently robust and proportionate. It is the view of the Applicant that additional baseline survey information would not materially alter the impact assessment, the avoidance and mitigation strategy, or the conclusions of Chapter 9: Ecology and Biodiversity [REP4-010].

Reference	Theme	Issue	Comments	Applicant's Response
			elsewhere are inappropriate within the context of Lime Down, when concerning species where no targeted surveys have been carried out yet.	
SLD1-050	Ecology and Biodiversity	Birds	3.3.10. Birds: No specific bird surveys were carried out within the CRC. Instead, results from the Solar PV site surveys were assumed to apply as well, due to similarities in the broad rural character of the two development areas. 3.3.11. As no surveys have been carried out within the fields or those adjacent to the CRC's order boundaries, it is currently unknown whether these temporary disruptions and exclusions from fields may force them into adjacent areas already at full carrying capacity. While rural bird species are mobile, and can adapt to disturbances, this is relevant in the context of the development due to the requirement for undeveloped fields and pastures for many species. If developed these may be surrounded by less suitable, actively worked crop fields or woodland habitats which cannot support the species. The	The Applicant notes this comment. The Applicant considers that a suitably precautionary and reasonable assessment of impacts for breeding and wintering birds has been undertaken pertaining to the Cable Route Corridor and does not consider it necessary or proportionate to have undertaken detailed surveys for these taxa to underpin the impact assessment. This is on account of the short-term, temporary, and progressive nature of the works associated with this element of the Scheme, whereby habitat will be reinstated on completion of works in any one area, following a relatively short construction period. It is entirely conceivable that potentially adverse impacts on breeding and wintering birds, including on ground-nesting species and birds of prey, will occur within the Cable Route Corridor,

Reference	Theme	Issue	Comments	Applicant's Response
			degree of these habitat loss impacts will depend on the duration of the CRC works, particularly if subject to unexpected delays. 3.3.12. While this is notable for skylark and similar ground-nesting birds, this can also have implications on the foraging behaviour for declining, BTO Red- and Amber-listed birds of prey as well, which are similarly territorial. This is notable in the context of this proposal due to the number of these species identified within the solar PV sites, including notably merlin.	as reported in Chapter 9: Ecology and Biodiversity [REP4-010]. However, no permanent habitat removal will occur within the Cable Route Corridor, and it is noted that the habitat type of any one field can change both during and between years in response to typical rotational agricultural practices (and thereby the suitability for birds). As such, detailed surveys for breeding or wintering birds are considered highly unlikely to have shaped the siting of the Cable Route Corridor, or the determination of appropriate avoidance or mitigation measures. Appropriate avoidance and mitigation measures for both breeding and wintering birds, to minimise impacts resulting from cable installation works, have been considered and detailed within the Outline EPMS [REP4-055], which is secured by Requirement 8 of the draft DCO [REP4-004].

Reference	Theme	Issue	Comments	Applicant's Response
SLD1-051	Ecology and Biodiversity	Operational Impacts	3.3.13. also has concerns about the framing of operational impacts (in the oOEMP [REP3-095]) as being solely from a point of view of local foraging benefits, when effectively the degree of displacement even in ideal conditions of post-development enhancement will see a significant loss of habitat for over 70% of the local breeding population for the scheme's duration.	The Applicant notes this comment relating to skylark displacement at the Solar PV Sites. Given the nature of solar development and the extent of the footprint required for panel installation, provision of suitable breeding habitat within panelled areas at the Solar PV Sites is not possible. Mitigation habitat is proposed in un-panelled areas to provide both breeding and foraging opportunities for ground-nesting species such as skylark. However, within the solar array itself, mitigation is proposed through increased value of habitat for foraging through creation of low-input grassland. This habitat is considered likely to support a greater diversity of invertebrate prey, compared to the intensively farmed arable baseline across much of the Solar PV Sites, and provide local foraging benefits to skylark territories in the surrounding landscape. Whilst this increased foraging resource is anticipated to provide some degree of mitigation for the adverse effects of the

Reference	Theme	Issue	Comments	Applicant's Response
				Scheme on skylark, it is acknowledged that these impacts are not mitigated fully. This is transparently reported within ES Volume 1, Chapter 9: Ecology and Biodiversity [REP4-010] , which identifies significant residual adverse effects on skylark at a Local level and on other ground-nesting bird species at a Site level. Delivery and management of proposed mitigation habitat is described in the Outline LEMP [REP3-100] , to be secured via DCO Requirement.
SLD1-052			3.3.14. Dormice: Due to the lack of surveys, dormouse presence has been assumed by the Applicant across all suitable habitat within the order limits. The mitigation measures outline the carrying out of single-stage clearance preceded by a pre-commencement search for all works which affect these habitats, adhering to relevant Mammal Society guidance. Hedgerow gaps will be maintained up to 12m width on average, and up to 10m within the Wiltshire Impact Zones for Bat Species.	The Applicant notes this comment relating to the proposed approach to dormouse mitigation.

Reference	Theme	Issue	Comments	Applicant's Response
SLD1-053	Ecology and Biodiversity	Dormouse	3.3.15. Public Records from the Wiltshire and Swindon Biological Records Centre show two records of dormouse nests being found north of Grittleton (ST 85150 81450). Habitats within this area are linked to the woodland parcels adjacent to Gauze Brook, and are adjacent to a proposed highway improvement area along Alderton Road. These linked habitats are adjacent to proposed crossing points 23, 24 and sections of 25. While relatively more distant, this population may also be relevant for hedgerow clearances at parcel 9, which is both adjacent to wooded habitat along the railway line, with the solar PV field enclosing a number of small woodland parcels within its boundary.	The Applicant notes this comment relating to local species records of hazel dormouse and connectivity to the Order Limits. A local species record of dormouse was recorded in the desk study undertaken for the Scheme, returned by Wiltshire and Swindon Biological Records Centre, and is presented in ES Volume 3, Appendix 9-1: Ecological Baseline Report [REP4-019]. The record reported in ES Appendix 9-1 [REP4-019] corresponds with the location of the records referenced in Stop Lime Down's comment. Given the presence of local species records and in the absence of species-specific surveys for dormice, presence of dormice has been assumed in all areas of suitable habitat within the Order Limits on a precautionary basis, including all hedgerows, woodland and scrub, and an assessment of potential impacts to dormice on this basis is presented in Chapter 9: Ecology and Biodiversity [REP4-010]. No residual

Reference	Theme	Issue	Comments	Applicant's Response
				significant adverse effects are anticipated on this species.
SLD1-054	Ecology and Biodiversity	Mammal Society Guidance	3.3.16. Under Mammal Society guidelines for single-stage clearances, the approach to be adopted limits works to May (accounting for potential clashes with nesting birds) and from mid-September to October in order to not result in significant impacts. This gives a window of at most 2.5 months a year where these single-stage clearances can be carried out. These can also be further restricted by changes in seasonal weather, such as an especially cold autumn or an early summer.	The Applicant notes this comment relating to Mammal Society guidance for single-stage clearance of suitable dormouse habitat.
SLD1-055	Ecology and Biodiversity	Highway Improvement Works	3.3.17. While highway improvement works will not require hedgerow clearances, partial cutting back will be included for safety and visibility splays (see at §1.1.17 of [REP3-101]). Partial clearances of sensitive hedgerow such as this, while less impactful in the autumn prior to winter hibernation, can result in a significant decrease in available nesting and foraging habitat	The Applicant notes this comment relating to potential impacts to dormice resulting from proposed highway improvement works, namely cutting back of hedgerows. The Applicant confirms that appropriate mitigation measures will be implemented during these works to avoid potential impacts to protected species, including dormice. The Outline EPMS [REP4-055] will be

Reference	Theme	Issue	Comments	Applicant's Response
			for dormice if carried out in the spring/summer, affecting local population. This is relevant for the proposal, as the necessary extent of these partial clearances along the various highway improvement areas are yet to be defined, and may be more extensive than the individually smaller gaps associated with the trench CRC and Solar PV sites. The north Grittleton highway improvement section is particularly sensitive in this case, as it is directly adjacent to the location of past dormouse nest records.	updated at Deadline 5 to provide further clarification on this matter.
SLD1-056	Ecology and Biodiversity	Dormouse Mitigation	3.3.18. The submitted dormouse mitigation measures note the requirement of pre-clearance searches for all works affecting suitable dormouse habitat, the above timing considerations should be factored as well for the associated traffic works within the wider landscape.	The Applicant notes this comment and provides response to the considerations raised by Stop Lime Down in the relevant response above.
SLD1-057	Ecology and Biodiversity	Impacts and Mitigation	3.3.19. While individual hedgerow clearance gaps will be limited where feasible, the scope of the scheme and	The extent of field boundary habitat removed at boundary crossings has been minimised as far as is reasonably

Reference	Theme	Issue	Comments	Applicant's Response
			linear nature of the CRC results in impacts and disruption taking place across a lengthy portion of the landscape. therefore questions the assessment of direct harm being limited to the Site level, and not at the higher Local level. Even the temporary impacts on the species, currently assessed to be at the Local level, can be argued to be towards the higher end of this category given the scope of the corridor being considered; the linear requirements of the cuts result in clearances separating hedgerow sections at both the northern and southern boundaries of the majority of individual fields, increasing the cumulative degree of fragmentation.	practicable across the Scheme. The proposed width of hedgerow crossings within the Cable Route Corridor (up to a maximum of 12m as set out in Section 2.4 of the Outline EPMS [REP4-055]) are not considered to constitute significant physical barriers to dormouse movement within the hedgerow network, as dormice are known to regularly cross gaps of this size. Further measures will be adopted to avoid and mitigate impacts on species present or potentially present in accordance with mitigation hierarchy. Prior to removal of all sections of field boundary habitat where required for cable installation, the habitat will be thoroughly inspected for protected / notable species and will only progress under the presence of a suitable experienced and licensed Ecological Clerk of Works (EcoCoW) as set out in, and secured by, the Outline EPMS [REP4-055]. This document also contains specific method statements designed to manage impacts of field boundary removal on dormice and other

Reference	Theme	Issue	Comments	Applicant's Response
				protected species which may inhabit field boundary habitat (including nesting birds). Such measures include sensitive timing of works and working methodologies, and the necessary course of action should protected / notable species be encountered during works. This approach is considered appropriate and proportionate for the Scheme, particularly given the relatively small extent of field boundary habitat requiring removal in any one location. Nonetheless, the cumulative effect of multiple hedgerow gaps on habitat fragmentation throughout the Cable Route Corridor, and potential increased risk of predation when crossing such gaps, has been considered in the assessment presented in Chapter 9: Ecology and Biodiversity [REP4-010]. Given the temporary nature of the majority of hedgerow removal within the Cable Route Corridor and the minimised width of hedgerow gaps, the Applicant maintains that the conclusion of no significant adverse effects on dormice set out in ES Chapter 9 [REP4-010] is

Reference	Theme	Issue	Comments	Applicant's Response
				appropriate and sufficiently robust given the mitigation measures proposed.
SLD1-058	Ecology and Biodiversity	Dormouse	3.3.20. Assuming dormouse presence across all hedgerows, woodland and scrub within the scope of the proposal, factoring alongside the limited seasonal window available for up to 1.7km of total hedgerow clearances, with possibly additional supervision required for associated highway improvement works, the proposal affords very limited flexibility in implementing its dormouse mitigation schedule. The proposal risks being in a position of requiring either long delays (which may clash with timing requirements outside the scope of ecology as well) or carrying out clearances at suboptimal times of year, significantly increasing the degree of disturbance and risk of injury/killing dormice and thus necessitating a licence beforehand regardless.	The Applicant notes this comment relating to the delivery of dormouse mitigation measures during construction. Works at the Solar PV Sites and within the Cable Route Corridor will be carried out in accordance with the Outline EPMS [REP4-055] to ensure the risk of potential impacts to dormice is minimised as far as possible. The Applicant is aware of timing constraints associated with a number of proposed mitigation measures and will ensure that concurrent works across the Scheme are sufficiently resourced during optimal time periods, to ensure works during sub-optimal times of year are avoided.
SLD1-059	Ecology and Biodiversity	Dormouse	3.3.21. Assuming consistent dormouse presence at all required hedgerow crossings, the proposal is at risk of	The Applicant notes this comment relating to the proposed approach to dormouse mitigation.

Reference	Theme	Issue	Comments	Applicant's Response
			requiring further surveys and potentially a licence mid-works during the development. As the species is particularly elusive, and factoring in seasonal/weather limitations to pre-clearance searches previously raised, the main risk of this approach over carrying these out as a full baseline survey prior to works is the higher likelihood of discovering an infringement only once it has been accidentally committed, particularly injury or killing. Halting mid-works has also a knock-on effect on other aspects of ecological mitigation such as birds or reptiles, potentially requiring further re-surveys and amendments to other mitigation strategies with strict seasonal/timing requirements.	The Applicant maintains that taking a pre-cautionary, non-licensed approach to dormouse mitigation, assuming presence of the species in all areas of suitable habitat, is a proportionate and sufficiently robust mitigation strategy. The mitigation measures set out within the Outline EPMS [REP4-055] follow best-practice guidance and have been designed to primarily avoid and to minimise potential adverse impacts to dormice. The Applicant considers additional baseline survey information would not materially alter the impact assessment or the conclusions of Chapter 9: Ecology and Biodiversity [REP4-010]. The Applicant acknowledges the risk of delay associated with adopting pre-clearance checks as a mitigation measure should a licence be required, and the association between mitigation measures for multiple species. Allowances exist within the construction programme to facilitate the licence application process, to ensure works remain legally compliant, as well as to

Reference	Theme	Issue	Comments	Applicant's Response
				ensure mitigation for multiple species is implemented in accordance with the Outline EPMS [REP4-055] .
SLD1-060	Ecology and Biodiversity	White-Clawed Crayfish	3.3.22. White-clawed Crayfish: While no species-specific surveys or trapping have been carried out within the solar PV fields or the CRC, presence of WCC has been assumed within all wet ditches and streams within the order limits. Precautionary mitigation methods will include pre-commencement searches prior to any works which will require sections of the ditch and watercourse to be removed.	The Applicant notes this comment.
SLD1-061	Ecology and Biodiversity	White-Clawed Crayfish	3.3.23. The species is noted to be sensitive to pollution impacts from silt and sediment deposition. Associated run-off prevention measures of measures will include use of silt fencing, temporary attenuation and siting of washdown and chemical storage areas, detailed in full within the oCEMP [REP3-093].	The Applicant notes this comment, and also notes pollution prevention measures are also detailed with the Outline LEMP [REP3-100] .

Reference	Theme	Issue	Comments	Applicant's Response
SLD1-062	Ecology and Biodiversity	Buffer Zones	3.3.24. When considering appropriate buffer zone widths from water features, such as those outlined in the context of BPF installation (in the oEPMS [REP3-103] at §3.3.8), these specify 8m minimum buffers from ditches, and wider buffers 10m-15m in width for minor watercourses depending on their ecological value. When the buffer specification widths were discussed at the hearing, it was noted that the 8m width specifically was decided in a context of BNG riparian zone definitions and flooding prevention.	The Applicant notes this comment.
SLD1-063	Ecology and Biodiversity	White-Clawed Crayfish	3.3.25. queries why, if WCC presence is assumed within all suitable water features, the more ample 10-15m buffer was not considered for the majority of wet ditches, or at least when these risked being associated with access and haul routes where risk of dust and sediment entering the feature are higher. If buffer width is instead to be amended upon discovery of a WCC during the pre-commencement search shortly prior to works, is concerned that	Suitable habitat for white-clawed crayfish comprises permanently wet watercourses/waterbodies, with generally good water quality, adequate food supply and availability of refuges. The majority of drainage ditches throughout the Scheme are considered sub-optimal for the species, due to water levels, silted channels and limited refuge opportunities. Suitable habitat at the Solar PV Sites comprises Gauze Brook and Gabriel's Well watercourses

Reference	Theme	Issue	Comments	Applicant's Response
			impacts within said watercourse will have likely already arisen by then in order for machinery and crews to access the area. This is relevant within the context of the project, as access requirements will entail a degree of permanent culverting across watercourses, which in turn could be a source of further silting throughout the construction and decommissioning phases, and to a lesser extent during operational maintenance.	in Lime Down D and E as well as a small number of wet ditches directly connected to these watercourses, and a small number of watercourses, including Pudding Brook, Byde Mill Brook and directly connected tributaries of these streams, provide suitable habitat in the Cable Route Corridor. Baseline conditions across the Scheme for white-clawed crayfish are set out in ES Volume 3, Appendix 9-1: Ecological Baseline Report [REP4-020]. The majority of suitable habitat for white-clawed crayfish comprises minor watercourses where a minimum protective buffer of 15m is proposed. The small number of wet ditches directly connected to the minor watercourses identified above, considered potentially suitable to support white-clawed crayfish, are protected by a minimum buffer of 8m during construction and operation. Standing advice provided by Natural England for avoidance, mitigation and compensation measures relating to white-clawed crayfish does not specify appropriate buffer sizes, but

Reference	Theme	Issue	Comments	Applicant's Response
				advises works are avoided in or near the watercourses/waterbodies in the first instance. The Applicant considers the proposed minimum 8m buffer sufficient to avoid direct or indirect adverse impacts to white-clawed crayfish potentially present within the wet ditches identified as suitable, in combination with further proposed mitigation measures. Further measures for the avoidance of impacts on white-clawed crayfish (assuming presence in all suitable habitat) include the implementation of good practice pollution prevention measures, which will seek to avoid degradation of suitable habitat during construction and are secured within the Outline EPMS [REP4-055]. It is the Applicant's view that the assessment of potential effects on this species and the identification of appropriate avoidance and mitigation measures, including the proposed watercourse buffers, are in accordance

Reference	Theme	Issue	Comments	Applicant's Response
				with the Natural England standing advice.
SLD1-064	Ecology and Biodiversity	White-Clawed Crayfish	3.3.26. This is also an example of how assuming presence can lead to underestimating impacts, as the lack of a precise location data/population size makes it difficult to apply mitigation measures that are not practical. This can lead to mitigation measures that are excessive where not required, and insufficient where they should be focused on.	The Applicant notes this comment, and maintains that the assessment of potential impacts to white-clawed crayfish presented in ES Volume 1, Chapter 9: Ecology and Biodiversity [REP4-010] is sufficiently robust, and the mitigation measures proposed within the Outline EPMS [REP4-055] are sufficiently precautionary to ensure adverse impacts to the species do not arise.
SLD1-065	Ecology and Biodiversity	Outline CEMP	Outline Construction Environmental Plan [REP3-093] 3.3.27. Table 3 discusses the need for construction site lighting during the winter months, with the EcoCoW to be consulted to determine best luminary specifications and locations to minimise light spill impacts. The Applicant has further outlined a preliminary ecologically sensitive lighting strategy, conscious of the sensitivity of light disturbance within Lime Down C and	The Applicant notes this comment.

Reference	Theme	Issue	Comments	Applicant's Response
			within the Wiltshire Impact Zones for Bats within the CRC.	
SLD1-066	Landscape and Visual	Lighting	3.3.28. In respect of Table 3 of the oCEMP, queries the approach to lighting and has concerns about the extent to which this lighting will be required within the CRC. Works within this section will be taking place at the same time at various points along the corridor. Seasonal restrictions for hedgerow clearance, and preferable avoidance when crossing undeveloped fields, suggests that the bulk of works would need to be carried out in autumn or late spring.	The Applicant notes this comment and provides response to the concerns raised in relation to construction-phase lighting in the Cable Route Corridor in the below response SLD1-067.
SLD1-067	Ecology and Biodiversity	Lighting	3.3.29. Given the extent of the CRC and number of individual ongoing construction areas within it, questions whether there could be a risk of cumulative lighting impacts within the CRC. Mitigation states precautionary measures such as directing mobile lighting towers away from hedgerows, woodland and watercourses as possible (see at §5.2.3 of [REP3-103]). ,	The assessment of potential impacts of increased artificial lighting at night during construction on protected and notable species, including particularly light-sensitive species such as horseshoe bats, is set out within Chapter 9: Ecology and Biodiversity [REP4-010] . As stated within Paragraph 9.10.186, no construction-phase artificial lighting is considered likely to be

Reference	Theme	Issue	Comments	Applicant's Response
			however, would question the proximity and frequency of these towers between different work sections; while ideally lighting specifications will help limit lux levels on flight corridors, if low levels of disturbance are consistently present across multiple adjacent sections of the CRC this could still represent a lengthy flight barrier across the landscape for particularly sensitive species, such as lesser horseshoe bats.	required outside of the winter months, with the potential exception in localised areas where horizontal directional drilling (HDD) is undertaken. This reflects the proposed construction hours of work, set out within Paragraph 3.4.20 of Chapter 3: The Scheme [APP-055] . Where artificial lighting is required, appropriate mitigation measures, including implementation of a sensitive lighting strategy, are proposed to minimise potential light spill onto ecologically sensitive habitat as far as is reasonably practicable. It is also noted in Paragraph 9.10.186 that bat activity is greatly reduced during winter months, and therefore the risk of significant impacts to foraging/commuting activity from artificial lighting during this period is low. No significant adverse effects on bats are anticipated as a result of increases in artificial lighting during construction, as set out within Chapter 9: Ecology and Biodiversity [REP4-010] .

Reference	Theme	Issue	Comments	Applicant's Response
SLD1-068	Cultural Heritage Transport and Access	Rodbourne Road	3.4.Heritage 3.4.1. At [REP3-129], the Applicant has provided comments on the submissions made by SLD at Deadline 2. At SLD-071, the Applicant provides a response to SLD's submission that the specific condition relating to highway improvements and site access southwest of Rodbourne to be a relevant requirement to assist in mitigating the effects identified by the Council and SLD on that heritage asset. It is noted that the Applicant has updated the Outline CEMP to include provision that the Wiltshire Council Conservation Officer should be consulted on the approval of design for the access. However, SLD's heritage expert remains concerned over the ability of the conservation officer to comment and control the Outline Construction Traffic Management Plan to mitigate against harm to the Rodbourne Conservation Area, particularly where heritage concerns conflict with highway operational needs.	As stated in 3.1 Draft DCO [REP4-004] the detailed design of the scheme must be submitted and approved by Wiltshire Council prior to the commencement of construction (see Requirement 5). As stated in Requirement 15 "No part of the authorised development may commence until a construction traffic management plan for that part has been submitted to and approved by the relevant planning authority." As stated in the Outline CTMP [REP1-112] the approval of highway improvement works to the track to the southwest of Rodbourne Road (Works Number 8b) by Wiltshire Council must be done so in consultation with the Wiltshire Council Conservation Officer. The Applicant therefore considers the appropriate mechanisms are in place whereby the detailed design for any part of the Scheme will be submitted to and approved by Wiltshire Council prior to its implementation. A safeguard has been put in place for Works Number 8b, to ensure the sign off from Wiltshire

Reference	Theme	Issue	Comments	Applicant's Response
				Council is done so in consultation with the Conservation Officer.
SLD1-069	Cultural Heritage	Winter Views	3.4.2. At SLD-118, the Applicant responds to SLD's concern that the letter from Historic England confirms that winter views may reveal more of the development. SLD note that both Historic England and Wiltshire are now in agreement with the approach taken and the accuracy of the visualisations. While SLD has some remaining concerns, it is accepted that these are relatively minor and SLD does not take a further point on this.	The Applicant notes SLD do not take further point on the methodology of the visualisations produced to support the assessment on Bradfield Manor.
SLD1-070	Cultural Heritage	Conservation Area	3.4.3. At [REP3-141], Wiltshire Council has provided comments on the other submissions received at Deadline 2. SLD agrees with the concern expressed by the Council's heritage officer at §4.31: <i>"The council has commented [REP2-048] that it is unclear what the mechanisms would be for ensuring this occurs, how much ability the Conservation Officer would have to</i>	See response to 3.4.1 above (SLD1-067).

Reference	Theme	Issue	Comments	Applicant's Response
			<i>influence the design and / or what would happen if there was any conflict of opinion. Whilst the provision is welcomed and has potential to allow some influence over the nature of the works, it clearly cannot necessarily reduce the potential impact to the character and appearance of the Conservation Area."</i>	
SLD1-071	Other Environmental Matters	Glint and Glare	3.5.Glint and Glare 3.5.1. To contextualise the information that has been provided by the Applicant, this section refers to a meeting took place between the Applicant's glint and glare experts, Pager Power () and SLD's expert (of Straten CSL) on 25 June 2026. During that discussion, the parties explored the Applicant's Photovoltaic Glint and Glare Study [APP-261] and the accompanying Glint and Glare Modelling Outputs Part 1 and 2 which had been submitted at Deadline 3 [REP3-137] and [REP3-138].	The Applicant notes this comment and responds to the relevant matters below.

Reference	Theme	Issue	Comments	Applicant's Response
SLD1-072	Other Environmental Matters	Glint and Glare	3.5.2. The methodology relied upon for assessing impact significance in Annex D was explored. sought to clarify how the set of thresholds were determined for impact significance. Pager Power explained that they were derived through their experience and from publicly available guidance they had drafted. SLD has now been provided a copy of this guidance, but notes that it includes a confidentiality clause; SLD consider the Applicant should secure confirmation that the guidance can be submitted to the Examination and then submit it as soon as possible.	The Applicant notes this comment and will consider whether it is appropriate to submit the Glint and Glare Guidance to the examination.
SLD1-073	Other Environmental Matters	Glint and Glare	3.5.3. SLD would question the integrity of relying upon this guidance given it was produced solely internal to Pager Power, as opposed to being industry verified. is unable to verify the integrity of the thresholds relied upon by Pager Power in the absence of verifiable information being provided. This includes understanding how both sensitivity of receptors but also magnitude of effect is assessed.	Pager Power's Glint and Glare Guidance was produced in the absence of any national guidance or legislation with the aim of filling a gap with regard to best practice for the assessment of Glint and Glare. This guidance has been used in the production of over 1,800 Glint and Glare Assessments, including other solar DCOs and the scale of this scheme

Reference	Theme	Issue	Comments	Applicant's Response
			Additionally, given the scale of the proposed scheme, standard guidance is not sufficient for properly assessing the scheme. Consideration must also be made to the size and disaggregated nature of the proposed development.	does not render the guidance any less applicable.
SLD1-074	Other Environmental Matters	Glint and Glare	3.5.4. In relation to cumulative and multi-directional effects, the size and scale of the proposed development was again raised and how the quantitative thresholds were evaluated against their own guidance. The Pager Power reports do not provide any clear evidence of expanding the cumulative or multi-directional aspect of this proposed development. The Applicant explained that the reality is that solar reflection was recorded for each receptor and the latest modelling outputs (Parts 1 and 2) provided that data. stated that this data was not available in the original submission and that verifying the textual content of the report against actual data made validation impossible. Pager Power explained that they used their own software, as opposed to ForgeSolar	Cumulative and multi-directional effects are inherently captured within the Glint and Glare Assessment but are not considered separately as it is not necessary to do so. Where the modelling predicts that solar reflections are possible from multiple directions, it is typically the case that reflections would only occur from one direction at a time (e.g. reflections may occur from the east in the morning and from the west in the evening). This does not present any additional effect which is not already considered through analysis of the duration or location of effect (depending on the relevant receptor). Glint and Glare modelling has been conducted using both Pager Power's internal modelling software and Forge Solar's software. Cross-checks have

Reference	Theme	Issue	Comments	Applicant's Response
			which is widely used internationally. again queried whether the Pager Power software had been independently validated; it would appear it has been adopted internally at Pager Power rather than being assessed in the industry	been conducted between the modelling outputs, and the results are very similar between the two models. Small differences between the modelling results are explained by different approaches to incorporating surface roughness, but the differences are minor and this would not affect the conclusions of the report.
SLD1-075	Other Environmental Matters	Glint and Glare	3.5.5. In view, Pager Power's approach causes concerns for the reliability of the data and understanding the conclusions reached. Pager Power has produced an extensive report using software that has not been validated and without providing a full set of data. That is inconsistent with industry expectations (as per ForgeSolar software) that allow for independent checking of results and the interpretation of these results.	The Applicant has provided all software inputs and outputs through data included in the Glint and Glare Assessment in Chapter 20 Other Environmental Matters [APP-072] and 9.37 Glint and Glare Modelling Outputs [REP3-137, REP3-138] . Cross checking has also been carried out between Pager Power's model and the Forge Solar model to ensure that the results are accurate.
SLD1-076	Other Environmental Matters	Glint and Glare	3.5.6. queried whether the Applicant's accepts that a receptor may experience glare from multiple arrays during the same flight or journey. Pager Power explained that they considered it unlikely	For aviation receptors, the most relevant guidance which is used worldwide for Glint and Glare is the FAA 2013 guidance, which incorporated the SGHAT glare intensity model. This

Reference	Theme	Issue	Comments	Applicant's Response
			that two arrays would cause solar reflection at the same time. disputes this. The proposed development surrounds a large area rather than being to one side. As a result, some receptor points are subject to multiple arrays (one behind another), and a moving receptor would result in arrays impacting at different points in the transit.	guidance states that there should be "No potential for glare or "low potential for after-image" [...] along the final approach path for any existing landing threshold or future landing thresholds". This guidance is therefore clear that the duration of glare or the potential for multi-directional glare is not a consideration for aviation receptors. This guidance is widely used within the industry and is the standard that solar developments in the UK are typically expected to meet by aerodromes and planning authorities. Where two solar arrays are directly adjacent (and therefore have the potential to produce a single glarespot) they have been modelled as a single area in order to prevent effects being underrepresented. Where panel areas are not adjacent, even if reflections occur at the same time, they would appear as two distinct areas of glare and the intensity of each would not be affected by the other.

Reference	Theme	Issue	Comments	Applicant's Response
SLD1-077	Other Environmental Matters	Glint and Glare	3.5.1. SLD note that technical modelling was not completed for local roads. At the meeting, Pager Power explained that local roads were excluded on the basis of low use and the likelihood of a multi-car pile up as a result. disputes this approach. The probability of an occurrence is not calculated on volume but on an event occurring. A narrow, local road with a similar speed limit (60 mph) to regional or national roads could result in a higher potential for an accident especially given the narrow road/lane environment often shared with other road users (cyclists, walkers, horses). The Pager Power reports discounted local roads on the basis of frequency without evidence of what volume of traffic is considered applicable. The assumption is that local roads are not busy but that is not validated in the Pager Power reports. Overall, it is considered that the apparent conclusion that the sensitivity of local roads is low is an underassessment given the susceptibility of the receptor and the	The potential impact upon a receptor is influenced by sensitivity and the magnitude of effect. For local roads, it is considered that the sensitivity is low due to the anticipated volume of road traffic and other factors relating to driver workload. Solar reflections have the potential to temporarily distract a driver, which is more likely to lead to a road traffic incident if a driver is already otherwise distracted or is dealing with a complex road environment. Similarly, the consequences of momentary distraction are likely to be more significant if there is a high volume of traffic, as any action or inaction by the driver would have a lower room for error and could potentially impact many road users. For this reason, it is considered that potential effects are greatest on regional or national roads and the impact upon local roads would be considered no greater than low impact in the worst case.

Reference	Theme	Issue	Comments	Applicant's Response
			severity of any effect that might an eventuate	
SLD1-078	Other Environmental Matters	Glint and Glare	3.5.2. In relation to aviation, asked whether Pager Power accept that pilots at uncontrolled airfields rely entirely on visual separation. Pager Power explained that their guidance applies additional considerations for these types of airfields. reiterated that, given the size and spread of the proposed development, the guidance should form part of the analysis, but the cumulative and multi-directional nature of the environment needs to be the primary areas of focus to determine impact.	The Applicant fully acknowledges that pilots at uncontrolled airports rely on visual separation. This is why visual circuits are also modelled for general aviation airfields, in addition to the 2-mile approach paths, but the FAA 2013 guidance remains relevant in terms of quantifying the intensity of glare and the resultant effect. Multi-directional glare is not a relevant separate consideration, as there is an inherent acceptance within the guidance that any duration of 'green' glare is acceptable, as it is unlikely to cause after-image which would disable a pilot.
SLD1-079	Other Environmental Matters	Glint and Glare	3.5.3. Pager Power stated that the probability of an aircraft being impacted by visual impairment is low. stated that this mistakes the proper approach to aviation safety management; a proper hazard and risk assessment must be considered on the assumption that glare is encountered consistently with the	The probability of aircraft experiencing glare is a relevant consideration, which is considered alongside other factors such as the predicted duration and location of glare in determining the overall level of impact. The FAA guidance remains the most relevant

Reference	Theme	Issue	Comments	Applicant's Response
			probability not evidenced at number of flights but the probability of glare (size and direction) be considered together with consideration towards severity. This case is not the straight application of FAA guidance due to the size and disaggregated nature of the proposed development.	guidance material for aviation impacts, as detailed in the above response.
SLD1-080	Other Environmental Matters	Glint and Glare	3.5.4. In respect of the quantitative thresholds applied by Pager Power in their reports, these thresholds focus purely on visual disturbance to a receptor without providing clear evidence of the cumulative and multi-directional impact of this particular proposed development. Solar farms must use guidance in a proportionate and reasonable manner reflecting the magnitude of the development. Applying a single guidance mechanism to a single roof array to a development the size of Lime Down requires extensive analysis and robust arguments with an evidence-based approach	The quantitative thresholds vary by receptor type but do inherently consider cumulative effects from multiple panel areas, as the modelling outputs are presented for all panel areas. Pager Power's guidance was developed primarily for use on ground-mounted solar farms rather than rooftop developments, but the fundamental safety and amenity considerations are similar, as they are based on levels of effect at the receptor location. This means that all developments are assessed against the same thresholds, but larger developments will typically have a larger zone of effect and/or a greater magnitude of effect on particular receptors.

Reference	Theme	Issue	Comments	Applicant's Response
SLD1-081	Other Environmental Matters	Glint and Glare	3.5.5. In conclusion, considers that the Pager Power report and modelling outputs lack sufficient data and robust evidence specifically around quantitative thresholds, hazard and risk analysis, sufficient evidence demonstrating impact as a result of cumulative and multi-directional impact of solar reflections. The fact that this study was undertaken using Pager Power developed software that has not been independently validated brings into question the validity of the results together with the interpretation of these results. The Pager Power guidance is essentially their own internal guidance made available to others as requested. Given the safety-critical nature of this issue, such guidance needs to be independently assessed against industry-recognised criteria. does not consider it is enough to point to the use of the guidance in the past without it being tested by external expertise. This guidance has apparently not been peer-reviewed; the acceptance of the guidance by clients must not be	The Applicant notes this comment and has responded to the relevant matters above.

Reference	Theme	Issue	Comments	Applicant's Response
			perceived as expert acceptance. The Pager Power report and supporting modelling outputs provide more of an opinion-based paper, based on Pager Power guidance and software, than industry accepted systems and processes (e.g. safety assessment). For a peer review to be effective, it must follow an evidence-based approach.	
SLD1-082	Other Environmental Matters	Glint and Glare	3.5.6. SLD would welcome written confirmation of Pager Power's responses to the following questions: • Have the relevant qualitative thresholds been published, and if so where?	The relevant qualitative thresholds are included within the Glint and Glare Assessment, in Section 7 and within the flowcharts in Appendix D.
SLD1-083			• What quantitative thresholds separate "No Impact", "Low", "Moderate" and "High" impact?	This varies according to the receptor type, and is set out within the relevant flowcharts, in Appendix D of the Glint and Glare Assessment.
SLD1-084	Other Environmental Matters	Glint and Glare	• How many minutes of green glare or yellow glare would trigger a Moderate or High impact within Pager Power's guidance?	Any duration of green glare towards approach paths is considered to be a low impact in accordance with FAA guidance, therefore there is no duration

Reference	Theme	Issue	Comments	Applicant's Response
				of green glare which would trigger a moderate or high impact. Under FAA guidance, even a single minute of yellow glare may be considered a significant impact. In practice, Pager Power's guidance suggests that where yellow glare is predicted, other relevant factors can be considered to determine the level of impact, including a consideration of where the glare originates from relative to the receptor. This may then be considered either High, Moderate or Low impact depending on the circumstances of the glare scenario.
SLD1-085	Other Environmental Matters	Glint and Glare	• If no thresholds exist, is the assessment ultimately based on professional judgement rather than objective criteria?	Professional judgement is indeed a component of this assessment, particularly where a duration of yellow glare is predicted towards approach paths. Professional judgement is exercised with reference to prior project experience and industry best practice.
SLD1-086	Other Environmental Matters	Glint and Glare	• Has Pager Power assessed cumulative glare from all arrays	Pager Power's modelling considers glare from all arrays within the output charts, rather than producing separate

Reference	Theme	Issue	Comments	Applicant's Response
			combined or largely on an array-by-array basis?	charts for each array. For glare intensity modelling, areas are combined where they are directly adjacent (or in very close proximity, i.e. within 50-100m) in order to capture the potential for adjacent areas to produce a single glarespot with a greater intensity than would be predicted from any single array. This is considered to be a conservative approach.
SLD1-087	Other Environmental Matters	Glint and Glare	How was the overall scale of this solar development accounted for?	The overall scale of the solar development is inherently accounted for within the methodology and modelling of the assessment. The spread of the development contributes to a large study area, as this is constructed as a fixed distance (dependant on receptor type) from the closest panel area. As the duration/intensity thresholds are considered at the location of receptors, a larger panel area can produce a greater degree of impact compared to smaller developments (though this is not necessarily the case). This is captured within the modelling and mitigation has

Reference	Theme	Issue	Comments	Applicant's Response
				been implemented where effects were deemed to be potentially significant.
SLD1-088	Other Environmental Matters	Glint and Glare	What is the cumulative/ multi-directional threshold that triggers a Moderate or High impact?	There is no specific cumulative or multi-directional threshold for impact, and instead these considerations are captured within the existing thresholds, as outlined in the above responses. For example, cumulative effects upon a dwelling from multiple panel areas would lead to an increase in the duration of effects, which could then result in a moderate or high impact rather than a low impact, but this would depend on whether the relevant duration thresholds had been breached.
SLD1-089	Other Environmental Matters	Glint and Glare	How is cumulative/multi-directional exposure incorporated into the significance assessment?	This question is addressed in the above response.
SLD1-089	Other Environmental Matters	Glint and Glare	Why is low traffic volume considered a factor indicating local roads are low sensitivity given the context of such roads and when the consequence of visual impairment could still be severe?	Low traffic volume is one factor in a consideration of why local roads are considered to have a low sensitivity, further details are provided in response SLD1-076 above.

Reference	Theme	Issue	Comments	Applicant's Response
SLD1-090	Other Environmental Matters	Glint and Glare	• Pager Power frequently argues that glare occurs when the sun is already low and therefore pilots or drivers are already exposed to bright sunlight. Can they provide evidence showing the reflected glare and the sun occupy the same visual sector given the expanse of the proposed development? Can they demonstrate this geometrically rather than through qualitative statements?	This data is available within the results charts, where the time and date of any predicted glare is identified along with the locations of reflecting panel areas.
SLD1-091	Other Environmental Matters	Glint and Glare	• At Badminton Airfield, how many annual minutes of yellow glare are predicted? - o In which months and at what times of day does it occur? - o Why was the impact classified as "Low" given the cumulative/multidirectional nature of the glare? - o What evidence supports the statement that effects can be "operationally accommodated"? - o Has Pager Power consulted Badminton Airfield pilots regarding operational acceptability?	The greatest duration of yellow glare predicted towards any single receptor at Badminton Airfield is 499 minutes (8.32 hours) per year for fixed panels and 611 minutes (10.2 hours) for tracking panels. The maximum duration towards any single receptor is the most relevant value as summing glare towards all receptors risks significantly overstating the potential durations through multiple-counting of glare towards nearby receptors. Yellow glare occurs between mid-March to mid-May and late-July to mid-October between approximately 6am and 7am GMT.

Reference	Theme	Issue	Comments	Applicant's Response
				This glare would occur towards receptors in visual circuits (which are not referenced within FAA 2013 but have been assessed to reflect the nature of operations at uncontrolled aerodromes), rather than approach paths, and would occur from behind the pilot when they are looking towards the airfield (which is not considered to be a sensitive location). The duration of yellow glare is short, and this glare is predicted to occur early in the day, when the sun is relatively low in the sky. It is for this combination of reasons that this glare is considered to constitute a low impact and is expected to be operationally accommodatable through briefing pilots of the possibility of glare at these times. The Applicant did not receive any feedback from Badminton Airfield during the non-stat or statutory consultations. However, the Applicant will reach out to them directly to see if they have any final comments.

Reference	Theme	Issue	Comments	Applicant's Response
SLD1-092	Other Environmental Matters	Glint and Glare	• At Bowldown Farm Airfield: o Did Pager Power assess cumulative glare across all contributing arrays? - o Does Pager Power consider over 12,000 minutes of annual green glare to be insignificant? - o What evidence supports that conclusion?	Bowldown Farm Airfield was considered at a high-level within the Glint and Glare Assessment, due to the distance and location relative to the solar arrays. Pager Power's professional judgement based on prior experience and knowledge of glare modelling was that yellow glare would not be possible considering the distance between the solar arrays and receptors. Under FAA guidance, any duration of green glare is considered not to constitute a significant impact and therefore 12,000 minutes of green glare is not considered significant as the primary consideration for pilots is the intensity of glare, and whether this breaches the green/yellow threshold. It is relevant to note that there is no classification below green, and as such any visible reflection would fall into that category no matter how faint it may appear in practice; as a result, the presence of green glare presents no evidence that there would be any

Reference	Theme	Issue	Comments	Applicant's Response
				potential for pilot distraction or after-image.
SLD1-093	Hydrology, Flood Risk and Drainage Gound Condition	Further clarity on detailed assessments where groundwater may be encountered	3.6.Hydrology 3.6.1. At Deadline 3, the Applicant made various revisions to Chapter 11 of the ES in response to questions raised by the ExA and the Environment Agency [REP3016]. It is noted that at §11.9.2 the Applicant provides further information around watercourse crossings, provision of SuDS and sediment control measures and the Water Management Plan. Under "Drainage and Surface Water Management" it is clarified that pre-commencement ground investigation will inform any subsequent detailed assessment construction methodology "where groundwater may be encountered." Given groundwater may be encountered anywhere, SLD seeks further clarity as to when such investigations will be conducted.	The Applicant does not agree that the wording implies that groundwater investigation will only be undertaken where groundwater is already known to be present. Intrusive ground investigation will be undertaken, as appropriate, prior to the commencement of construction to characterise soil and groundwater conditions across the Order Limits. Additional investigation will be undertaken in areas affected by identified geohazards, where permanent structures are proposed and where the conceptual site model identifies potential sources of contamination. The findings will inform the detailed construction methodology, including any requirements for groundwater management, dewatering and measures

Reference	Theme	Issue	Comments	Applicant's Response
				to prevent uncontrolled discharges. Should previously unidentified risks to groundwater receptors emerge during detailed design or construction, a detailed Hydrogeological Risk Assessment will be undertaken in consultation with the Environment Agency. This approach is set out in Chapter 19: Ground Conditions [REP3-023] and secured through the 7.12 Outline Construction Environmental Management Plan [REP4-049].
SLD1-094			3.6.2. Within the Applicant's Flood Risk and Drainage Strategy Covering Report [REP3-048], the Applicant characterises infrastructure into four types with different levels of drainage: 1. Large infrastructure requiring formal drainage; 2. Permeable structures like tracks; 3. Small infrastructure where gravel-filled	The Applicant does not agree that a separate formal drainage system is required for the Solar PV Panel areas. The Solar PV Panels are elevated above ground and do not form a connected impermeable drainage catchment. Rainfall will continue to reach the ground beneath and between

Reference	Theme	Issue	Comments	Applicant's Response
			soakaways are sufficient; and 4. Panel areas, which will have no drainage. While this information assists in understanding the Applicant's approach to the drainage strategy, SLD's criticism persists in respect of the lack of drainage strategy for panel runoff.	the panel rows. While the panels may redistribute rainfall locally at the drip line, this does not in itself generate an equivalent increase in runoff leaving the field. The hydrological performance of the panel areas is instead governed by the condition of the underlying soil and vegetation, the maintenance of existing ground levels and flow pathways, and the avoidance of erosion and compaction. These matters are addressed in Chapter 11: Hydrology, Flood Risk and Drainage [REP4-012], the site-specific Flood Risk Assessment and Drainage Strategy appendices [REP4-023 to REP4-035], the 7.12 Outline CEMP [REP4-049] and the updated 7.15 Outline Soil Resources Management Plan [EN010168/APP/7.15]. Formal drainage is therefore provided for impermeable infrastructure where it is required, while the panel areas are managed through soil, vegetation, erosion and runoff-pathway controls.

Reference	Theme	Issue	Comments	Applicant's Response
SLD1-095	Hydrology, Flood Risk and Drainage Gound Condition	Updated flood risk and drainage strategies for individual sites	3.6.3. At Deadline 3, the Applicant has provided updated flood risk and drainage strategies for the individual sites [REP3-050], [REP3-052], [REP3-054], [REP3-056], [REP3-058], [REP3-060], and [REP3-062]. It is noted that the design event assessment as shown in the FRAs is still the 0.1% AEP plus climate change Manning's assessment which produces absurd results. Additionally for all sites (save for E2), an identical summary has been provided of flood risk: "During the construction phase, temporary works and construction activities will be managed to maintain existing floodplain storage, floodplain capacity and overland flood flow routes. Temporary compounds, plant and material storage will be located outside areas identified as potentially susceptible to flooding where reasonably practicable, and construction activities will be undertaken in accordance with the Outline CEMP	The Applicant does not agree that the 0.1% AEP plus climate change Manning's assessment produces "absurd results". The Manning's method has been applied proportionately to estimate flood levels associated with minor watercourses and drainage features where detailed hydraulic data are not available. The assessment uses the relevant channel geometry, roughness, gradient and design flow assumptions to provide a conservative indication of potential flood behaviour. The 0.1% AEP plus climate change scenario is an extreme sensitivity assessment. It is not the sole basis for the Scheme design or the assessment of development resilience. Its purpose is to provide additional information on residual flood behaviour during a very low probability event.

Reference	Theme	Issue	Comments	Applicant's Response
			[REP2-019] to ensure flood risk is not increased elsewhere."	The repeated construction-phase wording within the individual ES Volume 3, Appendices 11-2 to 11-8: Flood Risk Assessment and Drainage Strategies [REP4-023 to REP4-035] sets out a common Scheme-wide requirement that temporary works and construction activities must maintain floodplain storage, conveyance and existing overland flow routes and must not increase flood risk elsewhere. That wording does not replace the site-specific assessment within each appendix. The individual Flood Risk Assessment and Drainage Strategies [REP4-023 to REP4-035] separately identify the relevant watercourses, flood risk sources, overland flow routes, local topography and drainage constraints for each part of the Scheme. The detailed construction controls will be developed through the 7.12 Outline CEMP [REP4-049], informed by the relevant site-specific Flood Risk Assessment and Drainage Strategy

Reference	Theme	Issue	Comments	Applicant's Response
				[REP4-023 to REP4-035] . The specific issue regarding the location of construction compounds, stored plant and materials is addressed in the Applicant's response to paragraph 3.6.4.
SLD1-096	Hydrology, Flood Risk and Drainage	Storage of material outside flood-susceptible areas	3.6.4. This raises the question as to what would happen when it is not "reasonably practical" to store material outside flood-susceptible areas, and whether there should not be a commitment to design the scheme so that construction compounds and significant material storage is always outside such areas	The Applicant confirms that construction compounds, stockpiles and significant material storage areas will be located outside Flood Zone 3b. Outside Flood Zone 3b, construction compounds and storage areas will be located outside areas susceptible to flooding where reasonably practicable, having regard to the final construction sequence, land availability and the temporary nature of the works. Where temporary activities are required within another area of mapped flood risk, the detailed construction arrangements will ensure that floodplain storage, conveyance and existing overland flow routes are maintained and that flood risk is not increased elsewhere.

Reference	Theme	Issue	Comments	Applicant's Response
				Plant will not be stored within Flood Zone 3b when not in use. Any short-term access by mobile plant required to construct the authorised development will be managed through the detailed CEMP, including monitoring of weather forecasts and flood warnings, removal of plant and materials in advance of a forecast flood event, provision of temporary cross-drainage where required, and reinstatement of affected drainage pathways following completion of the works. These measures will be developed through the 7.12 Outline CEMP [REP4-049], informed by the relevant site-specific ES Volume 3, Appendices 11-2 to 11-9: Flood Risk Assessment and Drainage Strategies [REP4-023 to REP4-035].
SLD1-097	Hydrology, Flood Risk and Drainage	Appendix 11-6 for Lime Down D BESS [REP3-058] and Appendix 11-8	3.6.5. SLD note that Appendix 11-6 for Lime Down D BESS [REP3-058] and Appendix 11-8 for Lime Down E2 [REP3-062] have changes relating to	The Applicant notes this comment. The wording quoted by SLD distinguishes between the physical Solar PV Panel and the sensitive electrical equipment mounted on or

Reference	Theme	Issue	Comments	Applicant's Response
		for Lime Down E2 [REP3-062]	equipment resilience in flooded areas and the BESS. The Applicant explains: “For both fixed and tracker panels, all sensitive electrical equipment mounted on the Solar PV Panels will be elevated by the supporting legs or frame so that it is no less than 0.6 m above the design flood level, including the appropriate climate change allowance. The lowest leading edge of the panel itself does not comprise sensitive electrical equipment and may sit lower depending on the final fixed or tracker arrangement.” 3.6.6. SLD notes that the panels could therefore sit below 0.6m above the design flood level.	associated with it. The Deadline 3 position required sensitive electrical equipment to be positioned no less than 0.6 m above the design flood level, including the applicable climate change allowance. The position relating to the lowest leading edge of the Solar PV Panels was subsequently clarified at Deadline 4 through ES Volume 3, Appendix 11-6: Flood Risk Assessment and Drainage Strategy Lime Down D / BESS [REP4-031] and ES Volume 3, Appendix 11-8: Flood Risk Assessment and Drainage Strategy Lime Down E2 [REP4-035]. The Applicant confirms that, following the Deadline 4 updates, the lowest leading edge of Solar PV Panels within the modelled flood extent will be raised above the 1% AEP plus climate change design flood level. Sensitive electrical equipment mounted on or associated with the Solar PV

Reference	Theme	Issue	Comments	Applicant's Response
				Panels will be positioned no less than 0.6 m above that design flood level. This approach ensures that the Solar PV Panels remain above the design flood level and do not present an additional inundation, blockage or flood flow conveyance risk during the design event. The requirements are set out in ES Volume 3, Appendix 11-6: Flood Risk Assessment and Drainage Strategy Lime Down D / BESS [REP4-031] and ES Volume 3, Appendix 11-8: Flood Risk Assessment and Drainage Strategy Lime Down E2 [REP4-035].
SLD1-098	Hydrology, Flood Risk and Drainage	Fluvial and Surface Water Flood TRisk Maps	3.6.7. The Applicant has also updated its site fluvial and surface water flood risk maps [REP3-027] to [REP3-033]. The Flood Risk maps have been updated to show fluvial and surface water risks on the same map (two separate maps previously). Additionally, 2m contour intervals and the direction of	The principal overland flow directions shown on ES Figures 11-1 to 11-7: Fluvial and Surface Water Flood Risk [REP4-023 to REP4-033] were derived from the available LiDAR and topographic information, the 2 m contour data, mapped surface water flood

Reference	Theme	Issue	Comments	Applicant's Response
			overland flow routes have been added. However, there is no statement of how the overland flow routes have been calculated. Additionally the Rodbourne Brook is mis-labelled "Sutton Benger Brook" on Figs. 11-6 [REP3-032] and 11-7 [REP3-033].	extents and the identified local drainage network. The arrows are intended to illustrate the principal direction of overland flow based on the surrounding landform. They are not presented as discrete hydraulically modelled flow paths. The underlying assessment of surface water flood risk remains based on the Environment Agency's mapped surface water flood information, reviewed against the available topographic and site-specific evidence. The Applicant acknowledges that Rodbourne Brook was incorrectly labelled as Sutton Benger Brook on ES Figure 11-6: Lime Down E1 Fluvial and Surface Water Flood Risk [REP4-0312] and ES Figure 11-7: Lime Down E2 Fluvial and Surface Water Flood Risk [REP4-033]. This is a labelling error only and does not affect the underlying flood mapping or conclusions of the assessment.

Reference	Theme	Issue	Comments	Applicant's Response
SLD1-099	Hydrology, Flood Risk and Drainage	Table 1 of Appendix F1 to SLD's WR [REP1-174]	3.6.8. In respect of the table at FHW1.2-1 in [REP3-128] representing the Applicant's response to Table 1 of Appendix F1 to SLD's WR [REP1-174], SLD has produced a table in response at Appendix C to this document.	The Applicant has reviewed Appendix C in full. It raises a number of matters concerning hydrology, flood risk and drainage that have already been considered in the submitted assessments and addressed through the Applicant's previous examination submissions. The Applicant has not identified any new evidence or material technical issue within Appendix C that alters its assessment or conclusions. To maintain a proportionate and focused examination record, the Applicant therefore relies on the evidence and responses already before the ExA rather than repeating those matters on a point by point basis.
SLD1-100	Other Environmental Matters – Major Accidents and Disasters	Battery Safety Management Plan	3.7.BESS Fires 3.7.1. At [REP3-107], the Applicant has provided an updated outline battery safety management plan. The following comments are made. 3.7.2. Clarity is sought as to whether a BESS supplier has been identified. At §1.2.2 of [REP3-041] (the Applicant's updated Appendix 3-1 Substations and	As stated in Section 1.1.10 of the Applicant's Outline BSMP [REP3-106], the illustrative Sungrow BESS design was selected as being representative a high energy density LFP BESS system (which is currently commercially available), crucially this design had undertaken Large Scale Fire Testing (LSFT) to establish minimum equipment

Reference	Theme	Issue	Comments	Applicant's Response
			BESS Description), the Applicant explains that it anticipates using "the Sungrow 'ST5015UX-3H 314 Ah' BESS Containers or similar." At §§4.1.30-4.1.36, the Applicant has referred to several possibilities and criteria for the identification of an appropriate BESS. The Applicant should clarify why the Sungrow model is considered to meet its criteria for safe BESS design.	spacing distances. The Applicant was also able to access information defining operating noise levels to help validate illustrative site design noise attenuation requirements. LFP is currently the dominant BESS chemistry and as defined in the Outline BSMP this provides reasonable worst-case data to assess explosion risks and toxic gas emissions. Because the illustrative current BESS design utilised for Outline BSMP drafting and fire emission modelling demonstrated that a fire did not propagate during Large Scale Fire Testing (LSFT) then the Applicant has demonstrated that the loss of a single BESS enclosure is a credible worst-case event for the safety and risk assessment documentation submitted for the DCO. Major BESS suppliers generally release a new BESS design within 18-month timeframes, therefore the referenced Sungrow model will be obsolete at the detailed design stage. It is never

Reference	Theme	Issue	Comments	Applicant's Response
				possible to select a BESS design at the DCO stage because all current BESS designs will be obsolete by the time planning is granted and the procurement process begins. Section 6 of the Outline BSMP documents the safety and testing standards the BESS system must adhere and critical risk assessment reports together with detailed consequence modelling which must validate both BESS and final site design layout.
SLD1-101	Other Environmental Matters – Major Accidents and Disasters Air Quality	Plume Study	3.7.3. SLD is concerned by the Applicant's proposal to defer a further Plume Study to the detailed design stage. It is unclear why a Plume Study cannot be carried out at this stage, given the location of the BESS and the likely model have been identified. Plainly, the conclusions of such a Plume Study will detail relevant effects of a BESS fire incident which the ExA should take into account at the DCO stage. It would also provide the Applicant with the opportunity to model ultrafine	A detailed assessment of BESS fire emissions has been undertaken as detailed in Environmental Statement Volume 3 Appendix 15-2 BESS Fire Emissions Modelling [REP2-013]. The Applicant does not agree that a further Plume Analysis Study can or should be undertaken at this stage. The assessment presented within the Environmental Statement has been undertaken using a precautionary, worst-case and technology-neutral approach and demonstrates that

Reference	Theme	Issue	Comments	Applicant's Response
			particulates and address some of the other criticisms made below.	predicted concentrations of all assessed pollutants are comfortably below relevant health-based thresholds at the nearest receptors. Sensitivity testing, including doubling emission rates, did not alter this conclusion. The detailed BESS technology, manufacturer, enclosure design, system configuration, Large Scale Fire Testing (LSFT) results and associated emissions characterisation data will not be known until the detailed design stage. Any plume study undertaken now would therefore be based on generic assumptions rather than the actual BESS system to be installed and would not provide a more reliable assessment than that already presented. The Plume Analysis Study secured through the Outline BSMP [REP3-106] will be undertaken using LSFT data and emissions characterisation from the selected BESS technology. The study will provide a system-specific assessment of plume behaviour and potential effects at sensitive receptors,

Reference	Theme	Issue	Comments	Applicant's Response
				and will inform the detailed consequence modelling, risk assessment and Emergency Response Plan developed at the detailed design stage. It is not intended to identify previously unassessed significant effects. The Environmental Statement has already demonstrated that, under conservative assumptions, no likely significant air quality effects are predicted. The Applicant is not “deferring” a further Plume Study. As explained in response to point 3.7.2 above, the specific BESS technology cannot be fixed during the DCO examination process because the technology ultimately procured at the detailed design stage may differ from that currently available. The requirement for a technology-specific Plume Analysis Study is secured through the Outline BSMP [REP3-106]. Section 5.5.14 of the Outline BSMP [REP3-106] stipulates “at the detailed design stage a BESS system and site specific Plume Analysis study will be

Reference	Theme	Issue	Comments	Applicant's Response
				conducted to assess the environmental impact of a site incident to sensitive receptors within a 1 km radius. Toxic gas emissions to sensitive receptors must be below relevant public health exposure limit guidelines when the battery system of a BESS is fully consumed (burnt out), production of Particulate Matter (PM) and a visibility impact assessment on any transport links within a 1 km radius of the BESS area will also be included. The ERP produced at the detailed design stage (template outlined in Section 5.4.4) will incorporate all necessary emergency response procedures and actions based upon thermal runaway test data supplied by the BESS system provider." Further safeguards are provided in Section 6.1.7 of the Outline BSMP [REP3-106], namely: "If the BESS system supplied differs from the specification considered for risk assessments and consequence modelling, then a full safety audit will be repeated for the new BESS system

Reference	Theme	Issue	Comments	Applicant's Response
				specification. These studies will be completed and signed off before construction commences." This ensures that any Plume Study is undertaken using emissions data and system characteristics from the BESS design installed on site, enabling a robust assessment of potential impacts at sensitive receptors under credible BESS failure scenarios. The Applicant's response regarding ultrafine particles is set out separately below in response to paragraph 3.7.17.
SLD1-102	Other Environmental Matters – Major Accidents and Disasters Air Quality	SLD's Deadline 1 submission on BESS fire emissions	3.7.4. At [REP2-042] the Applicant has provided a detailed response to SLD's Deadline 1 submission on BESS fire emissions. SLD's response is provided in turn below.	The Applicant has responded below.
SLD1-103	Other Environmental Matters – Major	Thermal Runaway Effect	Only One Container Affected (2.1) 3.7.5. The original risk assessment [APP-239] modelled a "fire" (thermal	As set out in the Applicant's response to AQ1.1 (Applicant's Response to the Examining Authority's First Written Questions [REP3-128]), the Applicant

Reference	Theme	Issue	Comments	Applicant's Response
	Accidents and Disasters Air Quality		runaway event) in only one container. SLD's Appendix I2 to its WR [REP1-181] submitted that a worst-case scenario should involve all 270 containers. The detailed response explains that modern BESS systems are designed to restrict the fire to one container and these have been proved to work using Large Scale Fire Testing. Use of such systems will be secured in the DCO. A fire involving all containers (or even more than one) is thus not a credible worst-case scenario. It is asserted that the two incidents cited from 2025 did not have these modern protections and are thus not relevant. SLD maintains its position is a reasonable worst case as at the least account must be taken of the very measures to stop spread failing, and thus a fire involving a reasonable number of containers should be modelled.	does not consider a multi-container fire to represent a credible reasonable worst-case scenario. A reasonable worst-case should be based on physically plausible outcomes informed by empirical evidence, testing and current standards. Modern BESS installations are required to undergo Large Scale Fire Testing (LSFT), which is specifically intended to demonstrate whether thermal runaway can propagate beyond the initiating enclosure. The selected BESS design will be required to successfully complete LSFT and demonstrate that fire propagation is prevented through validated design measures and equipment spacing secured through the Outline BSMP [REP3-106] . The Applicant does not consider it appropriate to define the reasonable worst-case by assuming failure of all tested and validated fire prevention and propagation controls. Such a scenario would be speculative and is not supported by available LSFT evidence for modern compliant BESS

Reference	Theme	Issue	Comments	Applicant's Response
				installations. As explained in response to AQ1.1, the assessment has therefore been based on the credible worst-case scenario evidenced by current testing and industry standards. Real world, worst-case scenario BESS fires have involved fires that have generally consumed two BESS enclosures i.e. fire has propagated from one BESS to another BESS unit. The worst-case propagation of four BESS enclosures occurred in Lyme, New York which involved battery systems integrating Nickel-Manganese-Cobalt (NMC) pouch cells in air cooled modules, these battery systems will not be considered for the Scheme. These worst-case real-world incidents have involved legacy BESS systems which had not undertaken LSFT, many systems were not NFPA 855 or UL 9540 compliant. There simply is no credible failure scenario that would result in fire propagation to every BESS enclosure. Because the illustrative current BESS design utilised for Outline BSMP drafting

Reference	Theme	Issue	Comments	Applicant's Response
				and fire emission modelling demonstrated that a fire did not propagate during LSFT then the Applicant has demonstrated that the loss of a single BESS enclosure is a credible worst-case event for the safety and risk assessment documentation submitted for the DCO. LSFT involves deliberately burning a complete BESS enclosure to evaluate thermal exposure, heat release rates, burn duration, maximum temperatures and, critically, the potential for fire propagation to adjacent BESS or associated equipment. The purpose of this testing is expressly to validate minimum equipment spacing and to demonstrate that cascading or multi container ignition does not occur where tested layouts and mitigation measures are implemented. These tests therefore explicitly address the type of multi-BESS fire propagation risks, including scenarios observed in real world incidents, by requiring evidence that propagation risk is controlled through

Reference	Theme	Issue	Comments	Applicant's Response
				design rather than reliance on emergency intervention. Sections 6.1.3, 6.1.4 and 6.1.5 of the Outline BSMP [REP3-106] mandate the key risk analysis reports which consider how to prevent and mitigate a multi-BESS failure incident. These reports must be provided at the detailed design stage and are BESS system and site layout specific. These types of risk analysis provide confidence to demonstrate that under day-to-day operation there is a low risk of a BESS failure incident, and in the event of an incident the credible hazards are understood and have been evaluated both at the illustrative and detailed design stages to demonstrate that the risk to site operatives, first responders, and the local population remains very low. As outlined in section 6.1.6 of the Outline BSMP the Applicant will also commission site specific heat flux and flame tilt consequence modelling to account for site topography and wind

Reference	Theme	Issue	Comments	Applicant's Response
				conditions to establish final equipment spacing distances for the Scheme.
SLD1-104	Other Environmental Matters – Major Accidents and Disasters Air Quality	Moss Landing Incident	3.7.6. The Applicant's assertion that even at the Moss Landing fire "air quality impacts in the surrounding area were generally transient and below public health thresholds" (§2.1.15) is doubtful. Although monitoring of gas concentrations in the area started remarkably quickly, it was still the day after the fire started, and monitoring understandably concentrated on places where people lived rather than the position of the pollutant plume (see Applicant's Ref 8). A few exceedances of the PM2.5 standard were in fact detected. Technically it is very difficult to capture localised effects from an acute pollutant event in real time, but it does not follow that effects do not occur	The Applicant does not agree that the Moss Landing incident undermines the conclusions of the assessment. Moss Landing involved a significantly larger-scale event than the credible worst-case scenario assessed for the Scheme and is therefore not directly comparable. Furthermore, the Scheme will be required to utilise a BESS design that has successfully completed Large Scale Fire Testing (LSFT) and demonstrated that thermal runaway propagation beyond the initiating enclosure is prevented. The Applicant acknowledges that monitoring of acute incidents is inherently challenging and may not capture all localised short-term effects. However, the available monitoring data following the Moss Landing incident indicated that air quality impacts in surrounding communities were generally

Reference	Theme	Issue	Comments	Applicant's Response
				transient and that EPA air monitoring results did not exceed applicable public health standards. The webpage detailing Moss Landing air quality monitoring/sampling results is available at: https://experience.arcgis.com/experience/0045660d4525482588730b41260c1004/page/Dashboard The possibility that localised short-term effects may occur does not invalidate the project-specific assessment undertaken for the Scheme. The Applicant has already confirmed that the air cooled, Nickel Manganese Cobalt (NMC) pouch cell battery systems integrated into the Moss Landing site will not be considered for the Scheme. The assessment conclusions are based on dispersion modelling of a credible worst-case fire scenario for the Proposed Development, rather than observations from Moss Landing. As set out in the Applicant's response to AQ1.1 (Applicant's Response to the Examining

Reference	Theme	Issue	Comments	Applicant's Response
				Authority's First Written Questions [REP3-128]), the assessed scenario is considered representative of the credible worst case, having regard to current industry standards, LSFT evidence and the controls secured through the Outline BSMP [REP3-106].
SLD1-105	Other Environmental Matters – Major Accidents and Disasters Air Quality	Fire Risk Assessment	3.7.7. The Applicant's relies upon an assessment by the Fire and Risk Alliance in 2025 at Reference 9, entitled "Assessment of Potential Impacts of Fires at BESS Facilities." SLD have been unable to identify this paper. SLD requests this paper be provided to SLD outside of the Examination (or submitted to the Examination), as well as all the references referred to in the detailed response are provided by the Applicant. Reference 9, in particular, is relied upon by the Applicant at seven points, and is clearly an important reference for the ExA to be aware of.	All documents referred to in the Applicant's Detailed Response to Stop Lime Down Deadline 1 Submission on BESS Fire Emissions [REP2-042] can be found online. Links to the documents are as follows: National Fire Protection Association (NFPA) (2026) <i>NFPA 855: Standard for the Installation of Stationary Energy Storage Systems</i> . Quincy, MA: NFPA. Available at: https://www.nfpa.org/codes-and-standards/nfpa-855-standard-development/855 Western Electricity Coordinating Council (WECC) (2025) <i>Moss Landing BESS Fire Report</i> . Available at: https://www.wecc.org/sites/default/files/d

Reference	Theme	Issue	Comments	Applicant's Response
				ocuments/progress_report/2025/Moss%20Landing%20BESS%20Fire%20Report%2012.17.2025.pdf Cotswold District Council (2026) <i>Planning portal</i>. Available at: https://www.cotswold.gov.uk/residents/planningbuilding/planning/planning-applications-register/ National Fire Chiefs Council (NFCC) (2026) <i>Grid scale energy storage system planning – Guidance for fire and rescue services</i>. Available at: https://nfcc.org.uk/our-services/building-safety/grid-scale-energy-storage-system-planning-guidance-for-fire-and-rescue-services/ Energy Storage News (2025) <i>Fluence, Hithium, Canadian Solar BESS units undergo Large-Scale Fire Testing without flames spreading</i>. Available at: https://www.energy-storage.news/fluence-hithium-canadian-solar-bess-units-undergo-large-scale-fire-testing-without-flames-spreading/ PV Magazine (2026) <i>Sunwoda completes large-scale fire test for '5</i>

Reference	Theme	Issue	Comments	Applicant's Response
				<i>MWh Liquid Cooling ESS</i>'. Available at: https://www.pvmagazine.com/2026/05/09/sunwoda-completes-large-scale-fire-test-for-5mwh-liquid-cooling-ess/ County of Monterey (2026) <i>Moss Landing Vistra Power Plant Fire: Testing and Monitoring</i>. Available at: https://www.readymontereycounty.org/emergency/2025-moss-landing-vistra-power-plant-fire/testing U.S. Environmental Protection Agency (EPA) (2025) <i>Battery Energy Storage Systems: Main Considerations for Safe Installation and Incident Response</i>. Available at: https://www.epa.gov/system/files/documents/2025-08/battery_energy_storage_systems_fact_sheet.pdf Fire & Risk Alliance (2025) <i>Assessment of Potential Impacts of Fires at BESS Facilities</i>. Available at: https://cleanpower.org/wp-content/uploads/gateway/2025/03/Assessment-of-Potential-Impacts-of-Fires-at-BESS-Facilities.pdf

Reference	Theme	Issue	Comments	Applicant's Response
				Cambridge Environmental Research Consultants Ltd (2023) <i>ADMS 6 Atmospheric Dispersion Modelling System User Guide Version 6.0</i>. Available at: https://www.cerc.co.uk/environmental-software/assets/data/doc_userguides/CERC_ADMS_6_User_Guide.pdf Claassen, M., Bingham, B., Chow, J.C., Watson, J.G., Chu, P.B., Wang, Y. and Wang, X.L. (2024) 'Characterization of lithium-ion battery fire emissions—Part 2: Particle size distributions and emission factors', <i>Batteries</i>, 10(10), 366. Available at: https://www.mdpi.com/2313-0105/10/10/366
SLD1-106	Other Environmental Matters – Major Accidents and Disasters	BESS Fire Emission Modelling	3.7.8. SLD's Appendix I2 to its WR [REP1-181] criticised the original BESS Fire emission modelling for restricting the analysis distance to 1 km from the source, when it was clear that the pollutants would travel further, and the concentration peak could well be further	The 1 km study area is not based solely on precedent. As set out in the Applicant's Detailed Response to Stop Lime Down Deadline 1 Submission on BESS Fire Emissions [REP2-042] , the 1 km radius aligns with the latest National Fire Chiefs Council

Reference	Theme	Issue	Comments	Applicant's Response
	Air Quality		than 1 km. In response several points are made: • At §2.3.3, the Applicant explains that “a 1 km study area was selected based on professional judgement and precedent from similar schemes, including published assessments for comparable BESS developments, such as Green Hill Solar Farm.” This is not a response to the concerns raised and an objective and reasoned justification for this approach should be provided. Additionally, at §2.3.3 the Applicant explains that “the NFCC’s latest guidance (Ref 4) identifies a 1 km distance as appropriate for emergency planning purposes”. The NFCC guidance mandates that sensitive receptors within 1 km must be mapped, not that the analysis should be restricted to this distance.	(NFCC) guidance for BESS emergency planning and the BESS fire emissions assessment methodology was reviewed by UKHSA, which confirmed it was satisfied with the assessment approach and conclusions. The Applicant agrees that NFCC guidance identifies a 1 km radius for the identification and mapping of sensitive receptors and does not, in itself, prescribe the extent of any dispersion modelling assessment. However, the 1 km study area adopted for the assessment was not based solely on the NFCC guidance. As set out in Section 2.3 of the Applicant's Detailed Response to Stop Lime Down Deadline 1 Submission on BESS Fire Emissions [REP2-042], a sensitivity check was undertaken using a 5 km × 5 km receptor grid centred on the simulated BESS fire. This sensitivity modelling demonstrated that maximum pollutant concentrations occur within 1 km of the source and decrease rapidly with

Reference	Theme	Issue	Comments	Applicant's Response
				distance due to atmospheric dispersion and dilution. The study area was therefore selected on the basis of both NFCC guidance and site-specific modelling evidence. The sensitivity assessment confirmed that extending the assessment beyond 1 km would not identify higher concentrations than those already assessed and that the highest ground-level concentrations occur within the 1 km study area. Given that predicted concentrations at receptors within 1 km were below the relevant health-based assessment criteria, concentrations at greater distances would be lower and would not alter the conclusions of the assessment.
SLD1-107	Other Environmental Matters – Major Accidents and Disasters Air Quality	BESS Fire Emissions Modelling	3.7.9. At Annex A the Applicant provides a contour plot of pollutant concentrations round the modelled fire, per SLD's suggestion in Appendix I2. The plot shows modelled 1-hour hydrogen fluoride ("HF") concentrations resulting from a fire in one BESS container, using meteorological data for	The Applicant agrees that the key consideration is whether receptors are exposed to concentrations that could result in adverse effects. However, this issue is addressed through the sensitivity assessment discussed in the response to point 3.7.8 above and as detailed in Section 2.3 of the Applicant's

Reference	Theme	Issue	Comments	Applicant's Response
			5 years. The Applicant uses the data to show that "the contours demonstrate that modelled HF concentrations peak within 1km of the BESS and decrease rapidly with distance beyond this ... The modelling therefore focuses on the zone where concentrations are highest and most relevant to exposure, which is in close proximity to the source" (§2.3.4). That concentrations are highest closest to the source is not surprising for a fire at ground level. Rather, the crucial point is whether receptors are being put at risk, whatever distance from the area. Restricting the analysis distance to 1 km prevents this question from being answered, whereas the contour plot allows an analysis	Detailed Response to Stop Lime Down Deadline 1 Submission on BESS Fire Emissions [REP2-042]. As explained in the response to point 3.7.8 above, a 5 km × 5 km receptor grid was modelled to examine the extent of pollutant dispersion. The resulting contour plot demonstrates that the highest ground-level concentrations occur within 1 km of the BESS and decrease with distance from the source. The purpose of this analysis was to confirm whether the 1 km study area captured the area of greatest potential exposure. The sensitivity assessment confirmed that it does and extending the detailed receptor assessment beyond 1 km would not identify higher concentrations than those already assessed. Given that predicted concentrations at receptors within 1 km were below the relevant health-based assessment criteria, concentrations at greater distances would be lower and would not alter the conclusions of the assessment.

Reference	Theme	Issue	Comments	Applicant's Response
SLD1-108	Other Environmental Matters – Major Accidents and Disasters Air Quality	BESS Fire Emissions Modelling	3.7.10. The plot shows that concentrations around the source are about 400 µg m ⁻³ . The concentrations at the nearest permanently-occupied receptors are around 55-70 µg m ⁻³ (Bradfield Manor, Townleaze Farm and houses in Hill Hayes Lane). Hullavington Primary School also appears to be within this range, although it is difficult to tell because the base photograph is of poor quality.	The purpose of Annex A Figure 1 in Applicant's Detailed Response to Stop Lime Down Deadline 1 Submission on BESS Fire Emissions [REP2-042] was to demonstrate the spatial extent of dispersion and confirm that the highest ground-level concentrations occur within the 1 km study area, rather than to determine concentrations at individual receptor locations. Concentrations at worst case sensitive receptors are presented in Environmental Statement Volume 3 Appendix 15-2 BESS Fire Emissions Modelling [REP2-013], which provides the maximum predicted concentrations at receptor locations. The contour plot is a graphical representation of modelled concentrations across a wider 5 km × 5 km grid and its purpose is not to infer precise concentrations at individual receptors. In regard to Hullavington Primary School, the maximum modelled 1-hour mean hydrogen fluoride concentration at receptor R9 (Newtown), which is closer

Reference	Theme	Issue	Comments	Applicant's Response
				to the BESS than Hullavington Primary School, is 65.8 µg/m ³ (including background concentrations). This is substantially below the Acute Exposure Guideline Level 1 (AEG1-1) criterion of 818 µg/m ³ used in the assessment.
SLD1-109	Other Environmental Matters – Major Accidents and Disasters Air Quality	BESS Fire Emissions Modelling	3.7.11. In this instance, concentrations of HF outside the 1 km zone do not exceed exposure standards, given emissions from only one module. It does not follow that this could have been deduced a priori. Analysis needed to be done at a greater distance in order to demonstrate this. The Applicant also claims (§2.3.4) “The characteristics of dispersion (relationship between concentration and distance from the fire) is the same for every pollutant emitted...”. This is unlikely to be true. HF is very reactive and very soluble in water. It will thus deposit more quickly, and under wet conditions, be rained out more effectively, than less reactive pollutants such as CO and NO ₂ . These will therefore travel further than HF relative to their concentrations close to	The Applicant agrees that hydrogen fluoride (HF), carbon monoxide (CO) and nitrogen dioxide (NO ₂) have different chemical and physical properties and therefore may exhibit different atmospheric behaviours. HF is more reactive than CO and NO ₂ and can be subject to deposition and removal processes that do not apply to the same extent to those pollutants. The statement in Section 2.3.4 of Applicant's Detailed Response to Stop Lime Down Deadline 1 Submission on BESS Fire Emissions [REP2-042] was intended to refer to the general relationship between concentration and distance from the source within the dispersion modelling, rather than to suggest that all pollutants exhibit identical atmospheric chemistry or deposition characteristics. However,

Reference	Theme	Issue	Comments	Applicant's Response
			the source. It is the low concentrations close to the source (relative to health standards) which imply, in this case, that it is not necessary to investigate concentrations further afield.	the conclusions of the assessment do not rely on HF being representative of all pollutants. HF was used in the sensitivity assessment because it is one of the pollutants of principal concern from lithium-ion battery fires and has the lowest AEGL-1 assessment criterion of the pollutants assessed. The purpose of the wider 5 km × 5 km modelling exercise was to confirm whether the 1 km study area captured the area of greatest potential exposure. As set out in the response to point 3.7.8 above, the sensitivity assessment demonstrated that the highest ground-level concentrations occurred within the 1 km study area. Furthermore, the detailed receptor assessment presented in Environmental Statement Volume 3 Appendix 15-2 BESS Fire Emissions Modelling [REP2-013] shows that predicted concentrations of all assessed pollutants at the worst-case receptors are below the relevant health-based assessment criteria. Consequently, even if certain pollutants disperse differently from HF, the assessment

Reference	Theme	Issue	Comments	Applicant's Response
				demonstrates that concentrations at receptors within the zone of highest exposure are below levels of concern and concentrations at greater distances would not alter the conclusions of the assessment.
SLD1-110	Air Quality	BESS Fire Emissions Modelling	Selection of Assessment Criteria (2.5) 3.7.12. This concerns particulate matter ("PM10"). It is agreed between SLD and the Applicant's consultants that there is no directly-applicable short-term standard for PM10 comparable to the AEGL values used in the rest of the assessment. The Applicant therefore substitutes an occupational health guideline of 4000 µg m⁻³ for respirable particles. SLD suggested in SLD WR Appendix I2 [REP1-181] that occupational health standards were inappropriate because (a) they assume healthy adults; (b) they assume exposure only during the 8-hour working day; and (c) they assume a degree of worker acceptance of the conditions. For (a) people who may be more vulnerable to pollution because they are	The Applicant disagrees that the WHO 24-hour particulate matter less than 10 microns (PM₁₀) guideline value or the UK 24-hour PM₁₀ air quality objective provide a more appropriate assessment criterion for a BESS fire scenario. As explained in Section 2.5 of Applicant's Detailed Response to Stop Lime Down Deadline 1 Submission on BESS Fire Emissions [REP2-042], these standards were developed for ambient air quality management and assessment of everyday population exposure, whereas the BESS fire assessment relates to a rare, short-term accidental event. Such events are more appropriately considered against acute exposure criteria where available. The Applicant acknowledges that there is currently no acute, health-based

Reference	Theme	Issue	Comments	Applicant's Response
			unwell, children or elderly; (b) potentially exposed for more than the working day and (c) having the pollution imposed on them; a more restrictive standard is needed. SLD suggested the World Health Organisation ("WHO") 24-hour standard of 45 µg m³ was more appropriate, noting that 3 exceedances a year are allowable. Alternatively, the UK National Air Quality Objectives, which are slightly less stringent, could be used (50 µg m⁻³ with 35 exceedances in England, 7 in Scotland). The Applicant disagrees, stating "The main purpose of the air quality objectives and WHO guideline levels is to protect the population over their lifetime" (§2.5.5). This is incorrect. The purpose of a 24-hour standard is to protect the population over 24 hours. If it is necessary to hold concentrations below 45 µg m⁻³ to protect people over 24 hours it is inconceivable that concentrations can be allowed to reach 4000 µg m⁻³, almost 2 orders of magnitude higher, over an 8- hour period and still be protective. While it is	assessment criterion for PM₁₀ equivalent to the Acute Exposure Guideline Levels (AEGs) available for other pollutants. In the absence of such a criterion, the Health and Safety Executive (HSE) Workplace Exposure Limit (WEL) for respirable dust was adopted as a pragmatic proxy. Importantly, the conclusions of the assessment do not depend solely on the choice of PM₁₀ criterion. The assessment applied a precautionary framework, including modelling of peak fire conditions, use of five years of meteorological data, worst-case BESS fire locations, and the assumption that maximum hourly concentrations are sustained for comparison with longer exposure periods. In addition, sensitivity testing demonstrated that even if emissions were doubled, the conclusions remained unchanged. Furthermore, PM₁₀ was not assessed in isolation. The assessment also considered pollutants for which recognised acute health-based criteria

Reference	Theme	Issue	Comments	Applicant's Response
			accepted that there is no appropriate standard, the 24-hour standards are a much closer approximation to what is needed. Given that BESS fires often burn for longer than 24 hours, a 24-hour average is not unrealistic.	exist, including hydrogen fluoride, hydrogen chloride, hydrogen cyanide, formaldehyde and nitrogen dioxide. Predicted concentrations of all assessed pollutants were below the relevant health-based thresholds at the modelled receptors. The Applicant therefore considers that the methodology provides a proportionate and precautionary assessment of a rare accidental event, whilst recognising the current absence of an established acute public-health assessment criterion for PM₁₀.
SLD1-110	Air Quality	Pollutant Concentrations Assessment in Hill Hayes Lane	Assessment of Near-Field Receptors (2.6) 3.7.13. SLD queried why there was no assessment of pollutant concentrations in Hill Hayes Lane and the main line railway, given that that these are the closest receptors involving people. The Applicant explained (§2.6.2) "Human health receptors were not included in the model on Hill Hayes Lane because it has no pavement...". The lack of a pavement is not a basis to exclude this receptor. Hill Hayes Lane is	The concern regarding Hill Hayes Lane has previously been raised in Written Representation, Appendix I2 (Air Pollution Modelling from a BESS Fire at Lime Down) [REP1-181] and has been subsequently addressed through the provision of modelled pollutant concentrations at the Hill Hayes Lane receptor locations in Section 2.6 and Table 1 of the Applicant's Detailed Response to Stop Lime Down Deadline 1 Submission on BESS Fire

Reference	Theme	Issue	Comments	Applicant's Response
			used frequently by dog walkers out from Hullavington and also by cyclists seeking a quieter road than the one through Norton. In response to Appendix I2 [REP1-181], the Applicants have supplied an assessment of the concentrations due to a single-container BESS fire (Table 1). The PM₁₀ concentrations are below the 4000 µg m⁻³ occupational health guideline, but as noted above, this is not an appropriate standard to use. The modelled concentrations are considerably higher than the 24-hour standard of 45 or 50 µg m⁻³, and as noted in Appendix I2, the modelled fire could be generated for 24 hours to obtain a 24-hour mean for a valid comparison. Although no-one will be present on the road for 24 hours, there are residential receptors not far away	Emissions [REP2-042]. These receptor locations were already included within the modelling for the visibility assessment and the corresponding pollutant concentrations have now been reported. It should be noted that the BESS fire emissions assessment, as presented in Environmental Statement Volume 3 Appendix 15-2 BESS Fire Emissions Modelling [REP2-013], already included the nearest residential receptors to the BESS and reported pollutant concentrations at those locations. The predicted concentrations at these receptors were below the relevant health-based assessment criteria adopted for the assessment. Comments relating to the appropriateness of the PM₁₀ assessment criterion are addressed separately in response to point 3.7.12 above and do not alter the conclusions of the assessment.

Reference	Theme	Issue	Comments	Applicant's Response																		
SLD1-111	Air Quality	Pollutant Concentration Assessment Receptors	3.7.14. The Applicant states (§2.6.4) “The railway was not included as a human receptor for pollutant concentration assessment because it is not a publicly accessible location where individuals would reasonably be present for sustained periods, and any interaction between a passing train and a buoyant fire plume would be brief and transient in nature.” This is acknowledged, but trains do stop, not least because there is a fire in a BESS adjacent to the line. Assessing a stationary train in the railway cutting adjacent to the BESS would be a properly precautionary approach.	The Applicant acknowledges that, in certain circumstances, a train could be stationary on the railway line during a BESS fire incident. For this reason, the Applicant has reviewed the modelled concentrations at the railway receptor locations used within the visibility assessment (RAIL1 to RAIL5). The maximum hourly mean concentrations (including backgrounds) for the worst-case modelled railway receptor location (RAIL2) are presented in the table below. <table><tr><th>Pollutant</th><th>Maximum Hourly Mean Concentration (µg/m³)</th></tr><tr><td>Carbon monoxide</td><td>16769.7</td></tr><tr><td>Formaldehyde</td><td>466.5</td></tr><tr><td>Hydrogen Chloride</td><td>798.0</td></tr><tr><td>Hydrogen Cyanide</td><td>281.3</td></tr><tr><td>Hydrogen Fluoride</td><td>2199.3</td></tr><tr><td>Ammonia</td><td>80.8</td></tr><tr><td>Nitrogen Dioxide</td><td>348.8</td></tr><tr><td>PM₁₀</td><td>1190.1</td></tr></table>	Pollutant	Maximum Hourly Mean Concentration (µg/m³)	Carbon monoxide	16769.7	Formaldehyde	466.5	Hydrogen Chloride	798.0	Hydrogen Cyanide	281.3	Hydrogen Fluoride	2199.3	Ammonia	80.8	Nitrogen Dioxide	348.8	PM ₁₀	1190.1
Pollutant	Maximum Hourly Mean Concentration (µg/m³)																					
Carbon monoxide	16769.7																					
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PM ₁₀	1190.1																					

Reference	Theme	Issue	Comments	Applicant's Response
				The concentrations indicate that, at the worst-case railway receptor location, the predicted maximum one-hour mean PM₁₀ concentrations was well below the 8-hour WEL (4000 µg/m³) and the predicted maximum one-hour mean CO concentrations was well below the 1 hour WHO guideline value (35,000 µg/m³). All other maximum one-hour mean concentrations were well below their respective AEGL level 1 for 1-hour, 4-hour and 8-hour exposure periods with the exception of hydrogen fluoride. The hydrogen fluoride concentration exceeds AEGL-1 but remains below the AEGL-2 and AEGL-3 criteria (detailed in Environmental Statement Volume 3 Appendix 15-2 BESS Fire Emissions Modelling [REP2-013]). AEGL-1 relates to notable discomfort, irritation, or certain asymptomatic non-sensory effects that are transient and reversible upon cessation of exposure, whereas AEGL-2 relates to irreversible or other serious, long-lasting

Reference	Theme	Issue	Comments	Applicant's Response
				adverse health effects, or an impaired ability to escape. The modelling therefore does not indicate the potential for serious or irreversible health effects at the railway receptor locations. In addition, outdoor concentrations adjacent to the railway would not necessarily be representative of in-carriage exposure. It should be noted that the assessed railway scenario represents a highly conservative combination of multiple independent worst-case assumptions. Specifically, it assumes: (a) a BESS fire occurs; (b) the fire occurs at the location closest to the railway line; (c) meteorological conditions coincide with those that result in the highest modelled pollutant concentrations towards the railway, noting that the reported concentrations represent the maximum concentrations predicted from five years of meteorological data; and (d) a train is present and remains stationary at the location of maximum predicted exposure during the period of plume impact. Whilst each of these assumptions has

Reference	Theme	Issue	Comments	Applicant's Response
				been adopted to ensure a precautionary assessment, the likelihood of all of these circumstances occurring simultaneously is considerably lower than the likelihood of any individual event occurring in isolation. The assessment therefore represents an extreme upper-bound scenario rather than a realistic prediction of likely conditions. It should also be noted that the closest section of the railway lies to the south and south-south-west of the BESS. Meteorological data used within the assessment indicates that wind directions from the north and north north-east, which would be required to transport emissions toward the railway, occur for a relatively small proportion of the time (approximately 7%). Whilst the assessment has appropriately assumed worst-case meteorological conditions for the purposes of dispersion modelling, this provides additional context that the alignment of plume direction and receptor location is of low likelihood in practice i.e. for risk assessment

Reference	Theme	Issue	Comments	Applicant's Response
				purposes probability is classified as low risk. The Outline BSMP [REP3-106] also includes measures requiring the site operator to determine wind direction and notify Network Rail should a BESS fire occur in proximity to the railway. The Applicant therefore considers that, even if a stationary train scenario is assumed, the assessment does not indicate the potential for serious adverse effects and does not alter the overall conclusions of the assessment.
SLD1-112	Air Quality	Emissions Data and Assumptions	Emissions Data and Assumptions (2.7) 3.7.15. In Appendix I2 [REP1-181], SLD criticised the use of a diesel fire as a proxy for a Li-ion battery fire as a source of particulates, and pointed out that there were data which allowed the calculation of particulate emissions from Li-ion battery fires directly. These gave emissions which were 2.5 to 4.66 times greater than the Applicant's method. The Applicant notes that the direct measurements were based on cell-level	The Applicant acknowledges the uncertainties associated with published particulate emissions data for lithium-ion battery fires. As explained in Section 2.7 of the Applicant's Detailed Response to Stop Lime Down Deadline 1 Submission on BESS Fire Emissions [REP2-042], the particulate emission factors cited by SLD are derived from cell-level testing and are not necessarily representative of emissions from a complete BESS enclosure, where

Reference	Theme	Issue	Comments	Applicant's Response
			testing rather than a whole BESS container, which would probably generate different concentrations. While this is acknowledged to be very likely, it still seems better to us to use data from real Li-ion fires rather than a surrogate. The Applicant concludes (§2.7.10) "Final risk assessments, consequence modelling, and Emergency Response Plans can only be developed once the selected BESS design is defined, including system configuration, operating parameters, and test data." SLD would suggest that there should now be enough information to select a detailed BESS design and test it appropriately, which would resolve some of these issues.	combustion behaviour, thermal containment, ventilation and enclosure design materially influence emissions. The Applicant therefore considered it more appropriate to adopt an enclosure-scale assessment approach informed by the advice of its Battery Safety and Testing Consultant. As reported in Environmental Statement Volume 3 Appendix 15-2 BESS Fire Emissions Modelling [REP2-013], the Applicant recognised the uncertainty associated with available emissions data and therefore undertook sensitivity testing. Even if particulate emissions are increased significantly above the values adopted in the assessment, predicted concentrations remain below the assessment criteria used and the overall conclusions of the assessment remain unchanged. The sensitivity testing therefore demonstrates that the assessment conclusions are robust to reasonable variations in particulate emission assumptions.

Reference	Theme	Issue	Comments	Applicant's Response
				As outlined in the response to point 3.7.3 above, the Applicant does not agree that a final BESS design can or should be selected at the DCO stage. Consistent with other DCO applications, the assessment has been undertaken using a representative worst-case design envelope. The final BESS manufacturer, enclosure configuration, battery chemistry, operating parameters and Large Scale Fire Testing (LSFT) data will not be confirmed until detailed design. As secured through the Outline BSMP [REP3-106], further plume analysis, risk assessment and emergency response planning will be undertaken once the final BESS technology has been selected and project-specific test data are available. This approach ensures that the final assessments are based on the actual installed system rather than assumptions regarding a technology that has not yet been procured. The Applicant therefore considers that the assessment adopts a proportionate and precautionary approach, whilst

Reference	Theme	Issue	Comments	Applicant's Response
				recognising the current limitations in available BESS fire emissions data and the stage of project development.
SLD1-113	Other Environmental Matters – Major Accidents and Disasters Air Quality	ADMS Model	3.7.16. SLD suggested in Appendix I2 [REP1-181] that ADMS was not a suitable model for situations such as a cloud of heavy vapour being produced in humid conditions and sinking into the adjacent railway cutting. The Applicant agrees (§2.8.3) but states that such conditions are unlikely for various reasons including thermal plume rise and wind direction. They state (§2.8.10) “evidence from realworld BESS fire incidents indicates that emissions are short-lived, highly dispersed, and localised to the vicinity of the fire, with no empirical evidence of hazardous vapour clouds forming or accumulating in low-lying areas at distances relevant to public exposure”. However, the majority of BESS installations are in warm, dry places. A conceivable scenario is a release on a misty night in the Cotswolds, when the HF dissolves in the mist to form the even more toxic	The Applicant acknowledges the hypothetical scenario described by SLD. However, the suggestion that hydrogen fluoride (HF) emissions would dissolve into atmospheric moisture, lose buoyancy and accumulate within the railway cutting is not supported by the available evidence. As explained in Section 2.8 of the Applicant's Detailed Response to Stop Lime Down Deadline 1 Submission on BESS Fire Emissions [REP2-042] , BESS fire emissions are generated within a high-temperature combustion plume characterised by strong thermal buoyancy, vertical momentum and rapid entrainment of ambient air, which promotes dispersion and dilution. Whilst HF is highly reactive and readily interacts with atmospheric moisture, this process reduces its persistence and potential to remain as a concentrated

Reference	Theme	Issue	Comments	Applicant's Response
			hydrofluoric acid, rapidly loses its thermal buoyancy, and flows into the adjacent railway cutting.	airborne plume at distance from the source. Furthermore, as set out in Sections 2.6 and 2.8 of Applicant's Detailed Response to Stop Lime Down Deadline 1 Submission on BESS Fire Emissions [REP2-042], the Applicant is not aware of any empirical evidence from real-world BESS fire incidents demonstrating hazardous vapour cloud accumulation in low-lying areas resulting in off-site public health impacts. A review of 35 large-scale BESS fire incidents found that emissions were generally localised to the immediate vicinity of the fire and subject to rapid dispersion and dilution. The Applicant therefore remains of the view that there is insufficient evidence to support the suggestion that a hazardous hydrofluoric acid cloud would form and accumulate within the adjacent railway cutting in a manner that would alter the conclusions of the assessment.

Reference	Theme	Issue	Comments	Applicant's Response
SLD1-114	Air Quality	Additional Pollutants in ADMS Modelling	Additional Pollutants (2.10) 3.7.17. SLD's experts pointed out in Appendix I2 [REP1-181] that some pollutants had not been considered, notably ultrafine particles ("PM2.5") which ADMS is capable of modelling. The Applicant agrees that these are produced, but cites the absence of short-term standards to compare them with as a reason for not modelling them. SLD's experts suggested that the precautionary principle should be applied here, and they should not be neglected because this is an evolving field and data are scarce. We note that the Applicant states in conclusion (§2.10.9) "Finally, it should be noted that a further Plume Analysis Study would be undertaken at the detailed design stage, based on BESS-specific fire testing data for the selected system. This would allow refinement of emissions characterisation (including particulates and trace compounds where measurable) and ensure that the Emergency Response Plan is informed	The Applicant notes that SLD agrees with the approach described in Section 2.10.9 of the Applicant's Detailed Response to Stop Lime Down Deadline 1 Submission on BESS Fire Emissions [REP2-042], whereby a further Plume Analysis Study would be undertaken at the detailed design stage using BESS-specific fire testing data for the selected system. As explained in Section 2.10 of the Applicant's Detailed Response to Stop Lime Down Deadline 1 Submission on BESS Fire Emissions [REP2-042], whilst particulate matter less than 2.5 microns in diameter (PM_{2.5}) and other ultrafine particulates may be generated during a lithium-ion battery fire, there are currently no recognised acute exposure criteria equivalent to AEGLs against which short-term public health effects can be assessed. In addition, representative emissions data for enclosure-scale BESS fires remain limited and highly variable. The Applicant therefore

Reference	Theme	Issue	Comments	Applicant's Response
			by the most up-to-date and representative data available." We agree with the suggestion to include particulates (including PM2.5) and trace elements in this final assessment, and suggest it should be included as a requirement in the DCO.	considers that the assessment adopts a proportionate and precautionary approach. Conservative assumptions and sensitivity testing have been applied, and the conclusions remain robust. The Applicant does not consider that a further DCO requirement is necessary. The Outline BSMP [REP3-106] already secures a further Plume Analysis Study at the detailed design stage, which would enable refinement of emissions characterisation, including particulates and trace compounds where measurable, based on the final BESS design and system-specific fire testing data. The development of the battery safety management plan, that must be substantially in accordance with the Outline BSMP [REP3-106], is secured by Requirement 6 of the Draft DCO [REP4-004].
SLD1-115	Human Health	Public Health	3.8.Human Health 3.8.1. The proposed development raises significant concerns in respect of public	Impacts on health and wellbeing are assessed in ES Volume 1, Chapter 18: Human Health [APP-070] . This chapter provides a comprehensive assessment

Reference	Theme	Issue	Comments	Applicant's Response
			health, most notably in respect of its potential impact on community identity and culture, and the associated mental health challenges, stress and anxiety this will cause those who live near the Scheme.	of the Scheme's potential effects on human health, including both physical and mental health and wellbeing, through consideration of a broad range of health determinants. The Applicant has specifically assessed 'community identity, culture, resilience and influence'. This assessment has considered community wellbeing and mental health through assessment of changes to community sense of place and community pride and character, and the extent to which the community can influence their surroundings. The assessment finds no significant adverse effects to health and wellbeing at any phase of the Scheme.
SLD1-116	Human Health Scheme Description and DCO Process	Requirement 4 of Schedule 2 of the draft DCO provide for a community liaison group	3.8.2. Requirement 4 of Schedule 2 of the draft DCO provide for a community liaison group ("CLG") to be established prior to the commencement of the authorised development which must be administered by the undertaker and operated in accordance with the approved terms of reference. The CLG is expected to meet until "the date of	The Applicant notes this comment and confirms that prior to and during the construction period, coordination will be supported by the Community Liaison Group, secured through Requirement 4 of the DCO, which will provide a formal and ongoing forum for the venue to

Reference	Theme	Issue	Comments	Applicant's Response
			final commissioning of the authorised development unless otherwise necessary."	manage its event schedule alongside the project's construction logistics.
SLD1-117	Human Health Scheme Description and DCO Process	Requirement 4 of Schedule 2 of the draft DCO provide for a community liaison group	3.8.3. It is very important that the CLG provide communities a genuine opportunity to engage in collaborative dialogue with the promoter of the scheme, allowing the community to shape the emerging project effectively. In addition, and as is already noted in SLD's post-hearing submissions for ISH4, SLD considers that the period for which the CLG operates should extend into the operational part of the lifetime of the scheme.	The Applicant recognises the Community Liaison Group (CLG) as a vital mechanism for transparent, collaborative dialogue and is committed to its establishment through Requirement 4 of the Draft DCO [REP4-004]. While the CLG will act as a primary intermediary during the construction phase to communicate timings and mitigate local impacts, its role during the subsequent operational phase is designed to be proportionate to the level of site activity. Under Requirement 4 of the dDCO (as above), the CLG is secured through construction and until the first anniversary of final commissioning to address any residual post construction matters. However, to ensure long-term accountability, the Applicant has committed to providing a designated community contact within the operation and maintenance team for the full

Reference	Theme	Issue	Comments	Applicant's Response
				operational life of the Scheme as set out in the Outline OEMP [REP4-051] and as secured through Requirement 14 of the Draft DCO [REP4-004] . Furthermore, a dedicated Community Liaison Manager would be reinstated during any significant "peak replacement" events and the decommissioning phase, with the CLG formally re-established at least six months prior to decommissioning as secured by Requirement 20 of the Draft DCO [REP4-004] .
SLD1-118	Human Health Scheme Description and DCO Process	Requirement 4 of Schedule 2 of the draft DCO provide for a community liaison group	3.8.4. SLD would welcome further information in respect of the CLG, including clarity as to the involvement of the local community in the design process. In particular, it is noted that there have been Relevant Representations from 23 parish councils. SLD would welcome a commitment from the Applicant in its communication strategy that the CLG will liaise directly with local parish councils. Parish Councils will often be	Further to the Applicant's response to SLD comments at 3.8.3, the Applicant confirms that accordance with the Design Approach Document [APP-268] , the Applicant has committed that emerging design decisions will be communicated to the local community via the CLG. This ensures that while detailed design is finalised, local representatives remain informed and engaged, fulfilling the Applicant's goal of delivering the Scheme sensitively.

Reference	Theme	Issue	Comments	Applicant's Response
			best placed to effectively communicate matters with local communities.	
SLD1-119	Human Health	Requirement 4 of Schedule 2 of the draft DCO provide for a community liaison group	3.8.5. However, for the avoidance of doubt, SLD does not consider the CLG to be an effective forum for resolving the mental health issues arising out of the proposed development. SLD remain concerned that the scheme will lead to rising rates of stress, anxiety and depression throughout the construction phase and as a consequence of the drastic changes to the landscape. This will inevitably place a strain on local health resources.	The Applicant notes this comment and refers to the response provided to 'CM-001' in the Written Summary of the Oral Submissions at the Open Floor Hearing 2 and the Applicant's Responses [REP4-088] . The Applicant also refers to 3.14.2 in the Statement of Common Ground with Wiltshire Council [REP4-061] where the Applicant has continued to engage with Wiltshire Council to discuss the role, scope, and efficacy of the CLG through discussion of the Terms of Reference that are secured through Requirement 4 of Schedule 2 to the Draft DCO [REP4-004] .
SLD1-120	Human Health Scheme Description and DCO Process	Wiltshire Council in its Local Impact Report [REP1-137] at p.224	3.8.6. SLD supports the requirements proposed by Wiltshire Council in its Local Impact Report [REP1-137] at p.224, as follows (SLD previously expressed support at §3.2.8 of [REP2-051]:	The Applicant notes this comment and refers to its response to this matter in Tables 8-1 and 16-8 within the Applicant's Response to the Local Impact Report [REP2-038] .

Reference	Theme	Issue	Comments	Applicant's Response
			No part of the authorised development may commence until a communication strategy be submitted and approved, with measurable and accountable outcomes for the mitigation on community identity and resilience impacts.	
SLD1-121	Human Health Scheme Description and DCO Process	Decommissioning and effects on community identity and resilience.	No part of the authorised development may commence until a Decommissioning Strategy is submitted and approved, to include mitigations for the impact on community identity and resilience.	Requirement 20 in Schedule 2 to the Draft DCO [REP4-004] provides for a decommissioning plan to be submitted to the relevant planning authority for approval in advance of the date of decommissioning. This ensures that the decommissioning plan reflects the legislation and guidance in place at the time of decommissioning. The decommissioning plan must be substantially in accordance with the Outline Decommissioning Strategy [REP3-096] .
SLD1-122	Human Health	Outline CEMP (at section 2.1) [REP3-093] and Outline Decommissioning	3.8.7. In respect of both of these provisions, SLD consider that the requisite inclusions should be made in the Outline CEMP (at section 2.1) [REP3-093] and Outline	Requirement 4 in Schedule 2 to the Draft DCO [REP4-004] provides for the terms of reference to be submitted to the relevant planning authority for approval prior to the commencement of

Reference	Theme	Issue	Comments	Applicant's Response
	Scheme Description and DCO Process	g Strategy (at section 2.10) [REP3-097].	Decommissioning Strategy (at section 2.10) [REP3-097]. This should set out, at the outline stage, parameters within which the CLG and the Community Liaison Officer will operate, but also measures in outline to manage community to identity and resilience.	the authorised development. The terms of reference will therefore be agreed with the planning authority, and the group established, reflecting the provisions and approach considered to be suitable. The Applicant is satisfied that this approach is appropriate to secure community liaison, noting that the exact requirements for liaison are likely to change depending on whether it is established for the purposes of construction or for decommissioning.
SLD1-123	Human Health Scheme Description and DCO Process	Additional Mitigations	3.8.8. In addition, and as reflected in SLD's comments on the Applicant's response to question HW1.1 (set out below), SLD consider that the Applicant should explore additional proposals to mitigate the harm which the Scheme will have on the local community, up to and including: Investing in the development of community assets and events as mitigation and enhancement; and	The Applicant is confident that the assessment of the Scheme set out in the Environmental Statement (ES) [APP-052 to APP-265] comprehensively and robustly assesses the level of effect on the physical environment as well as the economic and social conditions of the local population. This assessment identifies a full suite of management and mitigation measures that ensure the Scheme aligns with national and local planning policy. These measures are secured through the Requirements in Schedule 2

Reference	Theme	Issue	Comments	Applicant's Response
				of the Draft DCO [REP4-004] which ensure that potential impacts are avoided, mitigated, and minimised as far as possible. The Applicant remains confident that all required mitigations have been considered and that the secured plans provide a robust framework to address the Scheme's impacts throughout its lifecycle. The Applicant has committed to establishing a voluntary Community Benefit Fund (CBF) to recognise and contribute to local needs. This fund is designed to support community-driven initiatives that are not necessarily associated with the technical mitigation of the Scheme, such as social infrastructure, education, or environmental sustainability projects. The Applicant shall engage with local stakeholders through the Community Liaison Group (CLG) and the future CBF to structure and determine how this funding can best support local priorities. For example, the Applicant has already indicated that a renewable energy-themed hub or visitor facility could be

Reference	Theme	Issue	Comments	Applicant's Response
				explored if requested, with funding provided through the CBF. The Applicant clarifies that the Community Benefit Fund is separate from the DCO process and, while intended to deliver positive local impact, it is legally immaterial to the planning decision. Consequently, enhancements funded through this mechanism are not classified as mitigation for the purpose of the Environmental Impact Assessment.
SLD1-124	Human Health Scheme Description and DCO Process	Mental health funding	Funding local mental health organisations to enable them to mentor those who volunteer to undertake wellbeing support roles.	Consistent with the previous response above, the Applicant considers that funding for local mental health organisations is a key initiative to be explored through the voluntary Community Benefit Fund (CBF). Because the Environmental Statement identifies no significant adverse effects on population mental health following the implementation of secured mitigation, such funding would be classified as a community enhancement

Reference	Theme	Issue	Comments	Applicant's Response
				rather than a required planning mitigation. The Applicant invites local stakeholders to define their specific wellbeing and social infrastructure priorities through engagement with the Community Liaison Group (CLG) and the future CBF administrative structure to determine how voluntary funding can best support these local needs.
SLD1-125	Climate Change and Energy Need	Climate Response paper [REP3-132]	3.9.Climate 3.9.1. At Deadline 3 the Applicant produced a Climate Response paper [REP3-132]. A response from SLD's experts is provided at Appendix D to this document.	The Applicant acknowledges SLD's response and has addressed these in Climate Response to Wiltshire Council Appendix B of Written Rep and SLD Appendix J1 [REP3-132] .
SLD1-126	Soils and Agriculture	Outline Soil Resources Management Plan [REP3-099]	3.10. Soils, agriculture and ground conditions Outline Soil Resources Management Plan [REP3-099] 3.10.1. At Deadline 3, the Applicant provided an updated outline soils resources management plan ("SRMP"). 3.10.2. has further considered this Outline SRMP. He notes that the Plan should consider a pre-entry schedule of condition for the soils, to include soil health assessment alongside the ALC	ES Volume 3, Appendix 17-1: Agricultural Land Classification and Soil Resources Survey Report [REP3-067] includes a full schedule of soil survey data which serves as a pre-construction record of the soil characteristics including soil textures, depths and stone content, and soil structures also determined from a series of hand-dug soil pits. Laboratory results of nutrient analysis (pH, P, K, Mg and

Reference	Theme	Issue	Comments	Applicant's Response
			report. considers that this will provide a more detailed benchmark against which to judge post-decommissioning status and also to assess the progress of the site during operation. Particular attention should be paid to areas where soils will be stripped for any significant period of time.	organic matter content) and photographs of the soils across the Solar PV Sites are also included and contribute to the pre-construction record of condition. The Outline SRMP is updated again for Deadline 5 to include Visual Evaluation of Soil Structure (VESS) pits to be dug as necessary during construction in order to monitor soil physical structures and depths of any compaction, which are indicators of soil health.
SLD1-127	Soils and Agriculture	Outline Soil Resources Management Plan [REP3-099]	3.10.3. In respect of the Outline SRMP, has had regard to the relevant code of practice. The main document is the Defra Construction Code of Practice for the Sustainable Use of Soils on Construction Sites. It describes the following key points: • Key -management principles: o Storage Limits: Limit stockpile heights to maximums of 3 meters for topsoil and 5 meters for subsoil to prevent severe compaction.	The Applicant notes this comment. The advice given in Defra's Construction Code of Practice for the Sustainable Use of Soils on Construction Sites has been incorporated into the measures set out in the Outline SRMP [REP4-053] , to be developed further in the detailed SRMP.

Reference	Theme	Issue	Comments	Applicant's Response
			- o Site Selection: Choose dry, level, and protected ground, keeping a minimum 10-meter distance from any local watercourses or steep slopes. - o Separation: Keep different soil types strictly separated. Store "likeon-like" (e.g., store topsoils on pre-stripped topsoils) and use geotextiles between distinct layers.	
SLD1-128			• Handling and Shape - o Dry Conditions: Only strip and move soils during dry, workable weather. Wet soil handling destroys soil tilth and structure. - o Angle of Repose: Shape bunds with stable, manageable side slopes between 25 degrees and 45 degrees. - o Firming: Mound with tracked equipment (to spread weight) and avoid running heavy machinery over the stored piles.	See response above in row SLD1-127.
SLD1-129	Soils and Agriculture	Outline Soil Resources Management	• Long-Term Maintenance - o Vegetation Cover: If storing for longer than 6 months (or over the winter),	See response above in row SLD1-127

Reference	Theme	Issue	Comments	Applicant's Response
		Plan [REP3-099]	immediately seed bunds with a suitable grass mixture (e.g., non-aggressive, native perennial grasses) to bind the soil and prevent erosion by wind and water. o Weed Control: Regularly cut the grass (at least twice a year) and treat for noxious weeds to stop them from taking over the mound.	
SLD1-130	Soils and Agriculture	Outline Soil Resources Management Plan [REP3-099]	3.10.4. Above all, wet soils should not be placed in stockpiles, so as to minimise the risk of compaction. Soils should not be handled when wet – that is consistent with the DEFRA and AHDB soil guidance, and would avoid the issue altogether. The SRMP should make it clear that this is a 'golden thread' running through the document. Soils should be stockpiled according to the recommendations in the final detailed SRMP – which should include a height range for different soil types, considering their wetness characteristics and susceptibility to damage, including by compaction.	See response above in row SLD1-127.

Reference	Theme	Issue	Comments	Applicant's Response
SLD1-131	Soils and Agriculture	Outline Soil Resources Management Plan [REP3-099]	3.10.5. Soil health is a key issue and whether soils can maintain or improve soil health whilst in a bund, is considered unlikely. A key factor which has increasingly requested in respect of developments is a schedule of condition of the land before construction starts so that there is a benchmark against which future restoration can be judged. This should be included in the SRMP. This should include the recognised series of tests and assessments that can be conducted on site as part of a visual evaluation of soil structures: • Soil texture and depth of each horizon • Earthworm counts • pH • Nutrient status (typically N, P and K and some micronutrients and any contaminants) • Soil organic matter / soil carbon percentage • Bulk density • Infiltration/ hydraulic conductivity • Water holding capacity	ES Volume 3, Appendix 17-1: Agricultural Land Classification and Soil Resources Survey Report [REP3-067] includes a full schedule of soil survey data which serves as a pre-construction record of the soil characteristics including soil textures, depths and stone content, and soil structures also determined from a series of hand-dug soil pits. Laboratory results of nutrient analysis (pH, P, K, Mg and organic matter content) and photographs of the soils across the Solar PV Sites are also included and contribute to the record. This data will be referred to in the detailed SRMP and used as the basis for soil handling, management and reinstatement targets. Laboratory testing of bulk density, hydraulic conductivity, water holding capacity and aggregate stability are not typically included in an Agricultural Land Classification survey, only commentary on findings in the field.

Reference	Theme	Issue	Comments	Applicant's Response
			• Aggregate stability • Porosity • Soil structure and aggregate distribution	
SLD1-132	Soils and Agriculture	ALC reports	3.10.6. Each of these can be assessed or measured fairly easily from representative samples taken during the ALC or at a similar time. Some of the information is contained in the ALC reports but not specifically aligned to soil health and a schedule of condition. notes that it is in the interests of the landowner that will ultimately retain the land after decommissioning that these steps are taken.	See comment above.
SLD1-133	Soils and Agriculture	Soil health	3.10.7. The above will enable a preparation of a suitable baseline of soil health, against which a soil handling programme – including proposals for stockpiling – and any future restoration can be assessed.	The Applicant notes this comment.
SLD1-134	Landscape and Visual	Outline Landscape and Ecological	Outline Landscape and Ecological Management Plan [REP3-103]	The Applicant notes this comment raising concerns relating to the

Reference	Theme	Issue	Comments	Applicant's Response
	Ecology and Biodiversity	Management Plan [REP3-103]	3.10.8. notes that, at §1.3.9 provides for the planting of wildflower seed directly onto the stubble of previous arable crop. This raises concerns about the fertility of these soils and whether an appropriate wildflower seed could establish on this land. The Applicant should clarify how it intends to manage this issue, including the risk that the use of species of grass that can tolerate higher fertility may come to dominate the pasture and make reaching a true biodiversity mix difficult or even impossible to establish.	establishment of grassland on fertile soils previously under arable crop. The potential impacts of elevated soil fertility on the establishment of grassland at the Solar PV Sites have been considered within Paragraph 1.3.85 and Paragraphs 1.3.92 to 1.3.95 of the Outline LEMP [REP3-100] . Prior to any grassland seeding being undertaken, soil sampling will be carried out across the Solar PV Sites to assess current soil nutrient levels and determine appropriate seed mixes and management techniques to ensure successful establishment of proposed grassland habitat types. Section 1.4 of the Outline LEMP [REP3-100] also sets out proposals for ecological monitoring with more frequent monitoring proposed in the first 5 years post-construction to monitor habitat establishment and apply remedial measures, if necessary.

4.6 Stop Lime Down – Comments in Response to the ExA's First Written Questions

Table 4-6

Reference	Theme	Question Reference	Question	Comment on Response	Applicant's Response
SLD2-001	Cultural Heritage	CH1.2 Applicant	Heritage Visualisations 1 Paragraph 4.5.1 of ES Appendix 12-1 (Heritage Statement) [APP-219] states that heritage visualisations were agreed with Wiltshire Council on January 2024 (Annex E). However, Annex E only provides a list of heritage viewpoints. Can the applicant please direct the ExA to where the visualisations for these viewpoints are provided? If they have not been provided with the application material, then these are to be provided	4.1.1. Further visualisations have been provided in response to the Examiners' question CH1.2. The Applicant's response clarifies that these visualisations were not issued as supporting figures to the Heritage Statement, but that finalised versions have since been prepared. Clarity is sought whether, given those visualisations, the Applicant maintains their assessment. 4.1.2. SLD's heritage experts note that the	Technical Addendum to Chapter 12 Appendix 12-1 Heritage Viewpoints (Parts 1 and 2) [REP3-135] and [REP3-136] support the finds of ES Volume 1, Chapter 12: Cultural Heritage [REP3-017]. The Applicant considers the visualisations provided are sufficient to support the findings of their assessment and does not agree with the assertion that wireframe visualisations are required, or a viewpoint

Reference	Theme	Question Reference	Question	Comment on Response	Applicant's Response
			in response to this ExQ. Historic England and Wiltshire Council are also invited to suggest additional visualisations which they consider should be provided by the applicant to assist the examination, and may find the following documents helpful to inform their consideration – ES Figure 8-10 [APP099] and ES Figure 12-1 [APP-143]. The applicant is subsequently requested to provide the additional visualisations or justification as to why not.	Applicant has provided a technical addendum to Chapter 12 to include heritage viewpoints in [REP3-135] and [REP3-136]. SLD's expert notes that these viewpoints show the existing view and the extent of the proposed infrastructure on site, however an indication of the appearance of these proposals within these views (e.g. by a wireframe showing what is blocked, even if the screening is total) is not provided. It would be helpful to have updated comments from Wiltshire Council and Heritage	is required at Farleaze Farm. Wireframe visualisations have been provided in response to the Examining Authority's Second Written Questions [PD-014] (see Table 2-5 of the Applicant's Response to the Examining Authority's Second Written Questions [EN010168/EXAM/9.54]). The visualisations confirm the Applicants assessment.

Reference	Theme	Question Reference	Question	Comment on Response	Applicant's Response
				England on these viewpoints. 4.1.3. SLD further agrees with Wiltshire that an additional viewpoint should be provided to allow for a full assessment from Farleaze Farm.	
SLD2-002	Cultural Heritage	CH1.3 Applicant	Bradfield Manor Visualisations At D1A the applicant submitted visualisations showing the view of the proposed development from Bradfield Manor [REP1A014]. The visualisations appear to just highlight the footprint of where solar development would be	4.1.4. Clarity is sought as to whether the existing field patterns which will be seen at year 15 will be the existing (historic) field patterns – as these are part of the setting of the Grade I Manor.	As stated in Paragraph 12.8.6 of 6.1 ES Volume 1, Chapter 12: Cultural Heritage [REP3-017] positive outcomes may occur where proposed enhancements reinstate features recorded on historic maps or strengthen existing historic patterns As such by Year 15 it is

Reference	Theme	Question Reference	Question	Comment on Response	Applicant's Response
			located. Given the height of the solar PV panels, the applicant is asked whether, at both year 1 and year 15, the existing field pattern would be legible from these views or would the collection of fields where solar PV panels are proposed appear as a single mass of solar development?		anticipated that the enhancement of hedgerow and application of buffers between hedgerow and PV panels will mean that the legibility of field patterns will be visible.
SLD2-003	Hydrology, Flood Risk and Drainage	FHW1.1 Applicant	Policy Compliance - Larger PV Panels Paragraph 2.10.84 of NPS EN-3 (2023) states: 'Where a Flood Risk Assessment has been carried out this must be submitted alongside the applicant's ES. This will need to consider the impact of drainage. As	4.1.5. The Applicant responds [REP3-128] that "...the use of larger or tracking PV panels would not give rise to significant hydrology, flood risk or drainage effects beyond those assessed for the Scheme". They do however accept that	The Applicant notes that SLD agrees with the central distinction identified in the Applicant's Responses to the Examining Authority's First Written Questions [REP3-128] , namely that local redistribution of rainfall beneath Solar PV

Reference	Theme	Question Reference	Question	Comment on Response	Applicant's Response
			solar PV panels will drain to the existing ground, the impact will not, in general, be significant.' The ExA note the applicant's need for flexibility leading to the lack of confirmation regarding the type of PV panels to be used. However, the use of larger PV panels, never used in the UK before, introduces uncertainties to their hydrological impact which cannot currently be supported one way or another with evidence on the ground. The applicant's assessment of Hydrology, Flood Risk and Drainage (Chapter	"panel size, height and tracking behaviour can alter the local redistribution of rainfall within a field, including drip-line location, local concentration beneath panel edges and the height from which water falls". They state "The distinction that matters for flood risk is between redistribution of rainfall within a field and generation of additional runoff at the field boundary." "...For redistributed water to leave the field as increased runoff, it must travel across the ground surface and reach a field boundary or watercourse	Panels is not the same as an increase in runoff leaving the Site or an increase in downstream flood risk. The Applicant agrees that water may leave individual fields through both surface and shallow subsurface pathways. However, the presence of larger or tracking panels does not create additional rainfall volume. Any material change in field-scale or catchment-scale response would depend on whether the Scheme altered soil structure, vegetation cover, infiltration, storage or hydraulic connectivity

Reference	Theme	Question Reference	Question	Comment on Response	Applicant's Response
			11 of the ES [APP-063] and supporting appendices seem to assume that the hydrological effects of different PV panels would be the same, regardless of panel dimensions. SLD submitted detailed analysis and research regarding surface water redistribution and concentration along the panels, the creation of drip lines, increased kinetic energy of water falling from the panels, potential soil erosion, significant reduction of evaporation and increase of soil moisture [REP1-174, REP1-175, REP1-	as connected overland flow, at a greater rate or volume than under the existing condition. Whether that occurs is governed by ground cover, soil condition, soil compaction, erosion risk and surface flow connectivity." "...The mechanisms identified by SLD in [REP1-174], [REP1-175], [REP1-177] and [REP1-183] are recognised risk pathways, but they are conditional. They may occur where ground cover is degraded, soils are compacted, or connected bare-soil flow paths are allowed to form. They are not	sufficiently to increase the rate or volume of water reaching a field boundary or watercourse during the relevant design event. Those mechanisms have been assessed through ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP4-012] , the site-specific ES Volume 3, Appendices 11-2 to 11-9: Flood Risk Assessment and Outline Drainage Strategies [REP4-023 to REP4-036 and REP3-063] , and ES Volume 1, Chapter 17: Soils and Agriculture [REP3-021] . The assessment

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			177 and REP1-183]. This highlights potentially different impacts of larger PV panels which, coupled with the soil's sensitivity to compaction and low permeability, could lead to faster displacement of surface water runoff and potential increase of flood risk on and off site. The Applicant: As the ES does not include site specific analysis of the impact of different types of PV panels, the applicant is asked to explain their potential effect to demonstrate that they would not have significant impacts.	unavoidable consequences of larger panels." 4.1.6. Stop Lime Down concurs with the essence of this analysis, while pointing out that overland flow is not the only mechanism whereby water can leave the site, and subsurface runoff (throughflow) through the upper soil horizons is also likely to be a significant contributor to water output and flood peaks. 4.1.7. The Applicant goes on to claim these risks are controlled through the Outline CEMP,	identifies soil compaction, vegetation condition, erosion and the formation of connected preferential flow paths as the relevant risk mechanisms. It does not assume that those controls will be effective without inspection or intervention. The corresponding controls are set out in the Outline CEMP [REP4-049], the updated Outline SRMP [REP4-053], and the relevant landscape and ecological management documentation. These provide for avoidance of unnecessary trafficking,

Reference	Theme	Question Reference	Question	Comment on Response	Applicant's Response
			The LLFA: The LLFA is asked to submit comments on the documentation provided by SLD (referenced above).	Outline SRMP, Outline LEMP, and various management measures. SLD disagrees. The Applicant has made no attempt to assess the risks and simply assumes that the plans will be effective. The risk factors highlighted by SLD in [REP1-174], [REP1-175], [REP1-177] and [REP1-183] are not considered. The increased concentration of water by the larger panels, the greater kinetic energy of drops falling from a greater height leading to soil erosion, the sensitivity of local soils to compaction, the inevitability of some	protection of soil structure, monitoring of compaction and vegetation condition, investigation of ponding or erosion, remediation where required and subsequent verification. The Applicant does not accept that some degree of localised compaction or rainfall concentration necessarily translates into a significant hydrological effect. The relevant question is whether those mechanisms would create connected runoff or subsurface flow pathways capable of materially increasing discharge from the field

Reference	Theme	Question Reference	Question	Comment on Response	Applicant's Response
				compaction whatever mitigation measures are used, and the low permeability of many of the local soils all need assessment as the ExA requests. That the Applicant has failed to assess this is a flaw. SLD will bring forward an analysis of these factors for discussion at the next deadline. 4.1.8. The Applicant does not accept SLD's reduced evaporation argument as a basis for concluding that the Scheme would increase flood risk (now at [AS-020]). Though they accept that the	or downstream flood peaks. The submitted assessment and management framework are directed to preventing and correcting precisely those conditions. The Applicant also does not accept SLD's reduced evaporation argument as evidence of a material increase in design storm runoff. Reduced evapotranspiration may affect the long-term water balance and local soil moisture regime, but this does not demonstrate that a critical design storm would generate a

Reference	Theme	Question Reference	Question	Comment on Response	Applicant's Response
				mechanism will lead to increased water availability, they state that as it operates on an annual water balance basis, and thus "this does not demonstrate a material increase in design storm runoff or downstream flood risk." In [AS-020], SLD proposed a mechanism whereby increased soil wetness due to reduced evaporation, particularly in the Autumn, would be likely to lead to increased flood risk, particularly offsite, and the Applicant has not addressed this argument. They assert that "Design events are already assessed using	materially greater peak flow. Flood risk assessments are based on conservative design storm assumptions, including antecedent wetness and climate change allowances, rather than annual average evaporation conditions. For the reduced evaporation mechanism to demonstrate a material flood risk effect, it would be necessary to establish that the Scheme would produce a sustained and hydrologically significant increase in antecedent soil moisture beyond that already represented in

Reference	Theme	Question Reference	Question	Comment on Response	Applicant's Response
				conservative antecedent conditions and climate change allowances", but this mechanism will change the antecedent conditions and thus the result of the assessment. SLD will attempt to quantify this by the next deadline, and assess the cumulative effects.	the design event assumptions, and that this would materially increase field-boundary runoff or watercourse peak flows. No such site-specific evidence has been provided. The Applicant therefore maintains that the flexibility to use larger fixed or tracking panels would not give rise to significant hydrology, flood risk or drainage effects beyond those assessed for the Scheme. The relevant risks arise from soil, vegetation, erosion and flow-path condition, rather than panel dimensions alone, and

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					are addressed through the submitted assessment and management framework.
SLD2-004	Hydrology, Flood Risk and Drainage	FHW1.2 Applicant	Policy Compliance - Signposting The ExA note the contents of ES Volume 3, Appendix 5-1 National Policy Statement Requirements [APP-186]. However, SLD's submission [REP1-174] includes a list of flood risk assessment requirements in pages 20-23. The applicant is asked to provide a detailed response to this table, but if the information is already	4.1.9. The Applicant does not agree with SLD's conclusion that the Flood Risk Assessment meets only 6 of the 23 minimum requirements of NPS EN-1 §5.8.15. They state "SLD applies a binary pass or fail scorecard that does not reflect the proportionate, risk-based and mechanism-specific nature of the FRA process...". This is incorrect. Table 1 in §51 of [REP1-174] contains a brief discussion of most	The Applicant does not agree with SLD's characterisation of the assessment against paragraph 5.8.15 of NPS EN-1. A point-by-point response to each requirement identified by SLD was provided in Table FHW1.2-1 of the Applicant's Response to the Examining Authority's First Written Questions [REP3-128] , together

Reference	Theme	Question Reference	Question	Comment on Response	Applicant's Response
			contained within the application documents, please signpost the ExA to the specific relevant part of the documents, rather than just cite the document reference.	points where the conclusion is that the requirements of EN-1 have not been met, making it clear that in some cases they have partially been complied with. The Applicant appears keen to avoid dynamic modelling except in the two areas where they feel it is appropriate, even though it is apparently mandated by EN-1 §5.8.15. The LLFA in its response to Section 2 Submissions ([REP3-141] section 7) notes that "The absence of integrated catchment-wide modelling limits understanding of system	with specific signposting to the relevant parts of the application documents. The Applicant relies on that response. NPS EN-1 requires the level of assessment to be proportionate to the flood risk and appropriate to the scale, nature and location of the project. It does not mandate integrated dynamic hydraulic modelling across the whole Scheme or every minor catchment. The Applicant has applied a mechanism-specific approach, including detailed hydraulic modelling where the

Reference	Theme	Question Reference	Question	Comment on Response	Applicant's Response
				behaviour" and SLD agrees. 4.1.10. The Applicant has provided a point-by-point response to SLD's table with signposting to the relevant application documents." The response was eventually located as Table FHW1.2-1 on p.556 and is addressed in Appendix C to this document.	nature and extent of fluvial interaction justify it, quantitative drainage assessment for formal impermeable infrastructure, and proportionate assessment of smaller watercourses, drainage features and surface water pathways. Detailed hydraulic modelling has been undertaken for Gauze Brook at Lime Down D through the Hydraulic Modelling Report [REP3-131] and for Gabriel's Well / Rodbourne Brook at Lime Down E2 through the Lime Down E2 – Hydraulic Modelling

Reference	Theme	Question Reference	Question	Comment on Response	Applicant's Response
					Report [REP4-089]. The wider assessment is set out in Chapter 11: Hydrology, Flood Risk and Drainage [REP4-012] and the site-specific ES Volume 3, Appendices 11-2 to 11-9: Flood Risk Assessment and Outline Drainage Strategies [REP4-023 to REP4-036 and REP3-063]. SLD's reliance on the earlier position recorded in Wiltshire Council's Response to the Examining Authority's First Written Questions [REP3-142] does not reflect the LLFA's current position following review

Reference	Theme	Question Reference	Question	Comment on Response	Applicant's Response
					of the subsequent submissions and further engagement with the Applicant. The LLFA has confirmed that it is no longer seeking further scheme-wide hydraulic modelling. Its remaining matters relate principally to clarification, implementation, monitoring, management and verification, including vegetation management, soil compaction, construction-phase drainage, maintenance, inspection, intervention triggers and corrective action. The current consultee positions therefore support a proportionate

Reference	Theme	Question Reference	Question	Comment on Response	Applicant's Response
					and targeted assessment approach rather than the whole-Scheme hydraulic modelling advocated by SLD. The Applicant maintains that the assessment is proportionate, site-specific and compliant with paragraph 5.8.15 of NPS EN-1. The Applicant has reviewed Appendix C in full. It raises a number of matters concerning hydrology, flood risk and drainage that have already been considered in the submitted assessments and addressed through the Applicant's previous

Reference	Theme	Question Reference	Question	Comment on Response	Applicant's Response
					examination submissions. The Applicant has not identified any new evidence or material technical issue within Appendix C that alters its assessment or conclusions. To maintain a proportionate and focused examination record, the Applicant therefore relies on the evidence and responses already before the ExA rather than repeating those matters on a point by point basis.
SLD2-005	Hydrology, Flood Risk and Drainage	FHW1.3 The Applicant The LLFA	Flood Risk Assessment – Quantification of surface water and SUDS The outline drainage	4.1.11. The Applicant does not agree that the drainage strategies provide little or no	The Applicant does not agree that the submitted drainage strategies contain little or no

Reference	Theme	Question Reference	Question	Comment on Response	Applicant's Response
			strategies [APP-210 to APP-218] provide no or little quantification of the impact of the proposed development on surface water runoff. This has been consistently raised as a concern by SLD and it is included in the SoCG as under discussion with Wiltshire Council [REP2-025]. The LLFA includes in [REP1A-017] information regarding Section 19 investigations for Whitley and Beanacre. Its conclusions are that flood risk is pathway-driven and catchment-based (rather than limited to mapped fluvial floodplains) and that	quantification of the impact of the proposed development on surface water runoff, but in its defence cites only its assessments of what it calls "formal impermeable infrastructure", such as the BESS and substations. There is no quantitative assessment of runoff from the panel areas or the sites as a whole, which make up the majority of the site area. Instead, the Applicant relies on the assumption that its mitigation measures will be adequate to reduce any increase in runoff to insignificant levels (see	quantification of the effect of the Scheme on surface water runoff. The assessment is mechanism-specific. Quantitative runoff rates, attenuation volumes and restricted discharge rates are provided where the Scheme introduces formal impermeable infrastructure connected to a drainage system, including the BESS and substations. The relevant drainage calculations and principles are contained within the site-specific ES Volume 3, Appendices 11-2 to 11-9: Flood Risk Assessment and Outline Drainage

Reference	Theme	Question Reference	Question	Comment on Response	Applicant's Response
			ditch networks and overland flow routes act as conveyors. The outline drainage strategies do not include mapping of ditch networks or overland flow routes. Furthermore, the proposed development would introduce many impermeable elements (PV panel supports, smaller electrical infrastructure associated with PV panels, substations, BESS area, etc) which could potentially have important cumulative impact if not addressed on each site. The ExA note that the access	answer to FHW1.1 above). 4.1.12. The Applicant persistently misdescribes SLD's position on runoff from panel areas as involving "connected impermeable hardstanding". Variants of this phrase occur seven times in the Applicant's response to this question. Neither SLD, the LLFA, or anyone else has ever suggested this as a method of calculating runoff from the panelled areas at Lime Down. Instead, SLD would like the Applicant to assess the effects of the	Strategies [REP4-023 to REP4-036]. The Solar PV Panel areas are not treated as positively drained impermeable catchments. The panels are elevated above the ground and rainfall will continue to reach the soil beneath and between the panel rows. The Applicant accepts that panel dimensions and configuration can redistribute rainfall locally, but this does not create additional rainfall volume or necessarily result in increased runoff reaching a field boundary or watercourse.

Reference	Theme	Question Reference	Question	Comment on Response	Applicant's Response
			tracks would be permeable but, due to soil compaction, they could also become impermeable. The applicant proposes to use sustainable drainage systems (SUDS) and current site drainage to reduce surface water runoff to agreed rates. However, NPS EN-1 (paragraph 5.8.15, page 129) clearly requires the Applicant to 'set out (approximately) the existing rates and volumes of surface water run-off generated by the site'. The lack of quantification of the volume of water to be attenuated and lack of	oversized panels on rainfall redistribution and the consequential effects on runoff given the specific soil conditions at Lime Down, given the known propensity of the area to flooding. This needs to be calculated rather than assumed to be minimal. 4.1.13. The Applicant says it "will submit revised versions of the relevant ES Volume 2, Figures 11-1 to 11-8 [APP-135 to APP-142] at Deadline 3 with additional drainage information added where relevant and proportionate. The	The Applicant does not rely on the proposition that the panel areas would become connected impermeable hardstanding. The assessment instead addresses the mechanisms identified by SLD, including local rainfall concentration, soil compaction, vegetation condition, erosion and the formation of connected surface or shallow subsurface pathways. These matters are considered through ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP4-012], Chapter 17: Soils

Reference	Theme	Question Reference	Question	Comment on Response	Applicant's Response
			information regarding the SUDS to be implemented do not demonstrate that flood risk would not be increased and can be managed. We note the applicant's response to the LIR [REP2-038] and Response to D1A Submissions [REP2-040] which state that existing topography, drainage features, overland flow routes, surface water flood risk and watercourse connectivity across solar PV sites have informed the assessment. However, as outline drainage layouts or mapping of existing drainage	revised figures will show, where applicable: a. existing ordinary watercourses, ditches and drainage features where that detail is available; b. mapped surface water flood risk and overland flow routes; c. fixed or committed infrastructure with potential drainage implications; d. indicative permanent SuDS features or drainage zones where these are sufficiently fixed; e. conceptual drainage layouts for the BESS and substation locations, including indicative attenuation, discharge, containment or isolation	and Agriculture [REP3-021], the site-specific Flood Risk Assessment and Outline Drainage Strategies [REP4-022 to REP4-036 and REP3-063], the Outline CEMP[REP4-049] and the Outline SRMP [REP4-053]. The revised ES Volume 2, Figures 11-1 to 11-7: Site Fluvial and Surface Water Flood Risk Maps [REP3-027 to REP3-033] show the relevant watercourses, mapped surface water flood risk, topography and principal overland flow directions. The flow arrows are indicative and were derived from LiDAR

Reference	Theme	Question Reference	Question	Comment on Response	Applicant's Response
			features have not been submitted, it remains unclear how SUDS would interact with existing drainage features and other proposed mitigation measures. The Applicant is asked to: 1) Provide a high level calculation of the effect of all impermeable areas for each site, setting out the existing rates and volumes of surface water run-off generated by the site and to provide information regarding the type of SUDS and/or any other drainage features that could be used to drain the site.	principles where relevant; and f. indicative exceedance routing principles. g. High-level calculations and treatment of Scheme components" 4.1.14. The revised figures submitted at Deadline 3 (Figures 11-1 to 11- 7: Site Fluvial and Surface Water Flood Risk Maps Rev 2 [REP3-027] to [REP3-033]) show items (a), (b) and (c) from the list above, but not (d) or (e), and is difficult to understand how items (f) or (g) could be shown on a map. The position of the SuDS features (item d) is	and topographic information, mapped surface water flood extents and the identified drainage network. They are not presented as outputs from a detailed hydraulic model. Conceptual drainage arrangements and high-level calculations for the BESS and substation infrastructure have been provided within the updated site-specific Flood Risk Assessment and Outline Drainage Strategies [REP4-021 to REP4-036 and REP3-063], including the drainage hierarchy, indicative attenuation, discharge controls,

Reference	Theme	Question Reference	Question	Comment on Response	Applicant's Response
			2) Provide outline drainage layouts for each site showing potential SUDS connections with existing drainage features and exceedance routing. 3) Include any other information required by NPS EN-1, paragraph 5.8.15, bullet point 11 (i to x). 4) Add all SUDS features to the figures within the Landscape and Ecology Mitigation plans [REP1-029 to REP1-032] and provide an explanation of the multi-use purpose of each SUDS feature and how they contribute to water management and ecology.	important information given that they will need to be in lower parts of the sub- catchments, but will be ineffective in the Flood Zones. It is queried whether the Applicant is able to demonstrate that there is sufficient room for an adequate amount of SuDS. This can only be done by calculation of the required retention volumes, as the ExA requested. 4.1.15. SLD notes that the revised flood risk maps show the direction of overland flow at different locations, but there is no explanation of	containment and isolation principles and exceedance routing where relevant. The precise location and geometry of permanent SuDS features cannot be fixed until the final infrastructure layout, platform levels, impermeable areas and outfall arrangements are confirmed. The submitted assessment nevertheless establishes the drainage principles, approximate storage requirements and discharge controls necessary to demonstrate that the

Reference	Theme	Question Reference	Question	Comment on Response	Applicant's Response
			The LLFA: The ExA note the LLFA request for further hydraulic modelling in the Council's LIR [REP2-025]. 5) The LLFA is asked to confirm if the information requested by questions 1 to 4 above would address the key sensitivities listed in paragraph 2.21 of [REP1A-017] and negate the need for further modelling in principle. 6) If the answer is negative, the LLFA is asked to explain why not and what further information is needed considering the need for proportionality.	how these are calculated. Also Rodbourne Brook / Gabriel's Well is mislabelled as "Sutton Benger Brook" on Figures 11-6 [REP3-032] and 11-7 [REP3-033]. 4.1.16. SLD notes that the Applicant intends to provide further information on this question at Deadline 4, but does not intend to update the landscape and Ecology Mitigation Plans [REP1-029] to [REP1-032], as requested by the ExA, at this stage, which would have enabled an assessment of the	detailed drainage design can be accommodated. Detailed drainage schemes are secured through Requirement 11 of the Draft DCO [REP4-004]. Those schemes must demonstrate that runoff from formal impermeable infrastructure is attenuated and discharged at the agreed rates without increasing flood risk elsewhere. SLD's reliance on the earlier position in Wiltshire Council's Response to the Examining Authority's First Written Questions [REP3-142] does not

Reference	Theme	Question Reference	Question	Comment on Response	Applicant's Response
			7) If the answer is affirmative, the LLFA is asked to confirm if this information could be included in the outline management plans secured through the dDCO. If so, the LLFA is asked to explain which management plans and provide the proposed wording changes.	adequacy of the SuDS arrangements and their potential use in mitigating biodiversity loss. 4.1.17. On the final part of the ExA's question to the LLFA: the ExA asks the LLFA whether this would alleviate their concerns or whether they still require the hydraulic modelling they requested previously. The LLFA reply [REP3-142] that they still require the hydraulic modelling. SLD supports the view of the LLFA that hydraulic modelling for all significant catchments on site to meet the	reflect the LLFA's current position. Following review of the subsequent submissions and further engagement, the LLFA has confirmed that it is no longer seeking additional scheme-wide hydraulic modelling. Its residual matters concern the implementation, monitoring, management and verification of the submitted controls rather than a requirement to model all significant catchments or panelled areas. The Applicant therefore does not agree that paragraph 5.8.15 of NPS EN-1 requires hydraulic modelling of every

Reference	Theme	Question Reference	Question	Comment on Response	Applicant's Response
				requirements of NPS EN-1 §5.8.15.	significant catchment across the Scheme. Targeted hydraulic modelling has been undertaken where justified, while the wider pathway and catchment assessment draws on topography, LiDAR, mapped surface water flood risk, ordinary watercourses, drainage features and site-specific evidence. The mislabelling of Rodbourne Brook as Sutton Benger Brook on ES Volume 2, Figure 11-6: Lime Down E1 Fluvial and Surface Water Flood Risk [REP3-032] and ES Volume 2, Figure 11-7:

Reference	Theme	Question Reference	Question	Comment on Response	Applicant's Response
					Lime Down E2 Fluvial and Surface Water Flood Risk [REP3-033] is acknowledged. This is a labelling error only and does not affect the underlying mapping or assessment conclusions.
SLD2-006	Hydrology, Flood Risk and Drainage	FHW1.4 The EA The Applicant	Flood Risk Assessment – Flood Zone 3b and Floodplain Impacts. The LLFA considers in Wiltshire Council's LIR [REP1-137] that Flood Zone 3b needs to be defined for effective planning, design and operation of site. The applicant explains in its D2 submission [REP2-045] and response to the LIR [REP2-038] that	4.1.18. SLD notes that the Applicant confirms the freeboard allowances for electrical equipment at 0.6 m, but also states that "The lowest leading edge of the panel itself is not sensitive electrical equipment and may sit lower, depending on the final fixed or tracker arrangement". This statement has implications for the	The Applicant notes SLD's comments regarding the freeboard applied to Solar PV Panels within areas of modelled flood interaction. The position originally set out in the Applicant's Response to the Examining Authority's First Written Questions [REP3-128] required

Reference	Theme	Question Reference	Question	Comment on Response	Applicant's Response
			detailed hydraulic modelling for the Gauze Brook and the Unnamed river has been undertaken at Lime Down D, and that at Lime Down E2 further hydraulic modelling is being progressed in relation to Gabriel's Well to define local flood behaviour, including Flood Zone 3b where relevant. We understand that the details of the modelling are currently with the Environment Agency (EA) for review. The Environment Agency: 1) The EA is asked to explain if there are any concerns regarding the	maximum height of the panels in Flood Zone areas, which would otherwise be the panel height plus the design flood depth plus the freeboard allowance, i.e. 5.1 m in Area D and 5.3 m in Area E. It also raises the possibility that floating debris will be caught on the lower edge of the tracking panels during an extreme flood. SLD requests that the Applicant should clarify the position and address these concerns. 4.1.19. In relation to the question about whether SLD's submission in [REP1-176] could	sensitive electrical infrastructure to be located outside the design flood extent or raised at least 0.6 m above the design flood level, including the applicable climate change allowance. It also stated that sensitive electrical equipment mounted on Solar PV Panels would be positioned at least 0.6 m above that level, while the lowest panel edge could sit lower. This position was subsequently clarified through ES Volume 3, Appendix 11-6: Flood Risk Assessment and Outline Drainage

Reference	Theme	Question Reference	Question	Comment on Response	Applicant's Response
			parameters and outputs of the modelling done so far and the modelling being progressed by the applicant for Lime Down D and E2. 2) The EA is asked to explain if the information submitted by SLD, specifically in document [REP1-176] could support an extension to Flood Zone 3b in Lime Down D and if so, to which fields. The Applicant: 3) The applicant is asked to confirm the freeboard allowances requested by the EA in their document [REP2-049]	support an extension to Flood Zone 3b, the EA responds [REP3-146] that designation of Flood Zone 3b is up to the LLFA and SLD should submit [REP1-176] to the LLFA if we wish it to be considered, which SLD will do. However, the EA also state that the extent of Flood Zone 3b is normally determined by modelling a 3.33% AEP event, and the Applicant is committed to doing this for the two major sites of fluvial flooding in Areas D and E2. [REP1-176] showed that the flooded area during Storm Bert was greater than the modelled	Strategy Lime Down D / BESS ([REP4-031] and ES Volume 3, Appendix 11-8: Flood Risk Assessment and Outline Drainage Strategy Lime Down E2 [REP4-035]. The lowest leading edge of any Solar PV Panel located within the modelled flood extent will be raised above the 1% AEP plus climate change design flood level. Sensitive electrical equipment mounted on or associated with the panels will be positioned at least 0.6 m above that design flood level.

Reference	Theme	Question Reference	Question	Comment on Response	Applicant's Response
				functional floodplain, but Storm Bert was a more severe event (approximately 1% AEP). 4.1.20. The EA's concerns about modelling parameters will be discussed under FHW1.5.	The Applicant therefore does not agree that the lowest panel edge would be inundated during the design event or create an additional blockage risk. The final panel arrangement will be developed within the authorised maximum parameters while meeting the specified flood resilience requirements. The functional floodplain at Lime Down D has been assessed through the Hydraulic Modelling Report [REP3-131]. The functional floodplain at Lime Down E2 has been assessed through the

Reference	Theme	Question Reference	Question	Comment on Response	Applicant's Response
					Lime Down E2 – Hydraulic Modelling Report [REP4-089].
SLD2-007	Hydrology, Flood Risk and Drainage	FHW1.5 The LLFA The EA The Applicant	Flood Risk Assessment – Manning Calculations Results Figure 1 (page 10) of SLD's representation [REP1-174] shows the flows calculated using Manning's open channel flow formula. It is in section 'Fluvial Flooding' which discusses in detail the information submitted in the flood risk assessments submitted by the applicant. All Parties: 1) The LLFA, the EA and the applicant are asked to submit a response to	4.1.21. The EA responds to this question [REP3-146] by saying that SLD's analysis of the Manning's flows is correct and the Applicant's flow calculations are an order of magnitude or more greater than they should be. They confirmed this on the most extreme value by doing their own calculations using their standard modelling approach. 4.1.22. The EA then point out that the small	The Applicant notes the Environment Agency's comments in the Environment Agency's Response to the Examining Authority's First Written Questions [REP3-146] regarding the magnitude of the flows derived from the Manning's calculations. The Manning's calculations were undertaken as a conservative screening assessment for selected smaller watercourses and drainage features where detailed hydraulic

Reference	Theme	Question Reference	Question	Comment on Response	Applicant's Response
			the analysis done by SLD and its conclusions. In your response, please set out the implications for the interaction with surface water flood risk and the potential impact to on site and off site flood risk. The Applicant: 2) Paragraph 25 of the SLD representation refers to inconsistencies/mistakes between references to the 0.1% Annual Exceedance Probability (AEP) and the 1% AEP events in the flood risk assessments. The applicant is asked to review, confirm and address any	watercourses crossing the site have catchment areas too small to generate a Flood Zone, the limit being 3 km², and thus Flood Zones may not be designated in these areas even though they are at risk. The Applicant proposed to the EA to use the surface water flooding map, known as Risk of Flooding from Surface Water ("RoFSW") instead of the fluvial flooding map in these areas. The EA appears to agree to this, and use the Mannings flow calculations to justify it, saying that they show that the amount of	data and mapped fluvial Flood Zones were not available. They were not developed or relied upon as detailed dynamic hydraulic models and were not used as predictions of the change in flood risk caused by the Scheme. The assessment approach began with the Environment Agency's published Risk of Flooding from Surface Water mapping, including the 0.1% AEP extent, as a conservative indication of the wider area potentially affected by flooding. The Manning's calculations were then used to provide

Reference	Theme	Question Reference	Question	Comment on Response	Applicant's Response
			inconsistencies in the flood risk assessments.	flooding is not very sensitive to rainfall event probability. Professor Skeffington's opinion is that a precaution approach would use a model producing realistic results before drawing such conclusions. 4.1.23. The Applicant however does not agree with SLD's interpretation of the Manning calculations or with the conclusions drawn from Figure 1 of SLD's WR, Appendix F1 [REP1-174], though they do reluctantly accept that the explanation of the process in the FRAs could be clearer. They	indicative level-flow relationships for the 1% AEP event plus climate change at selected smaller watercourses and drainage features. The Applicant acknowledges that the description of the assessment in the earlier ES Volume 3, Appendices 11-2 to 11-8: Flood Risk Assessment and Outline Drainage Strategies [REP4-023 to REP4-036] was not sufficiently clear. In particular, references in Annex B to the 0.1% AEP event did not clearly distinguish between the mapped 0.1% AEP

Reference	Theme	Question Reference	Question	Comment on Response	Applicant's Response
				proceed to provide an explanation which does not appear at all even in the third revisions of Appendix 11-1 Flood Risk and Drainage Strategy Covering Report [REP3-048] and Appendices 11-2 to 11-8 [REP3-050], [REP3-052], [REP3-054], [REP3-056], [REP3-058], [REP3-060], and [REP3-062], respectively the Flood Risk and Drainage Strategy for Individual Sites, supplied at Deadline 3. The Applicant "started from the Environment Agency's published flood mapping, including the 0.1% AEP surface water	surface water extent and the intended 1% AEP plus climate change Manning's assessment. The correct interpretation is that the 0.1% AEP Risk of Flooding from Surface Water mapping was used as a conservative spatial indication of the potential wider flood extent, while the Manning's calculations were intended to provide indicative levels for the 1% AEP event plus climate change. The Environment Agency's comments on the calculated flows do not alter the assessment

Reference	Theme	Question Reference	Question	Comment on Response	Applicant's Response
				mapping, which was used as a conservative indication of the wider potential flood extent. The Manning calculations were then used to estimate indicative flood levels for the 1% AEP event plus climate change at selected smaller watercourses and drainage features". The Manning calculations presented should therefore be for the 1% AEP event, but Annex B in each FRA states that it shows values for the 0.1% event. The ambiguity noted by the ExA is thus unresolved.	conclusions. The Manning's outputs were conservative screening outputs and were not relied upon to demonstrate a low baseline flood risk or to determine the significance of an effect caused by the Scheme. Where the outputs indicate potential interaction with a minor watercourse or mapped surface water pathway, the Scheme design retains the relevant flow route and applies the embedded controls within the relevant Flood Risk Assessment and Outline Drainage Strategies [REP4-021

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				4.1.24. The Applicant devotes a lot of space to refuting claims which SLD has not in fact made, such as that the Manning's calculations show that solar panels increase runoff volume or lead to an increase in off-site flooding. Rather than address these in detail, we review below our original criticisms of the Manning's calculations and where they stand after the Applicant's response. Our criticisms were: (a) That the results of the modelling were unrealistic – this view is supported by the Environment Agency; (b) That the descriptions of	to REP4-036 and REP3-063] SLD's proposed assignment of a high magnitude of impact and major significance does not follow the methodology in ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP4-012] . The Manning's calculations describe potential baseline flood behaviour. They do not quantify a change caused by the Scheme. The magnitude of impact must be based on the change attributable to the Scheme, rather than the severity of the

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				the process in the main text and Annex B of the FRAs are confusing and contradictory – this is still the case; (c) That it was unclear what, if any, use had been made of the modelling. This is now a little clearer in the Applicant's response though not in the revised FRA documents. (d) How the Applicant had used the modelling results in their assessment that the flood risk was "negligible to low" when the model results showed that extreme rainfall events would produce devastating flooding. This is still unexplained. In [REP1-174] at §26,	existing flood hazard in isolation. The Scheme does not remove the smaller watercourses or established overland flow pathways. Solar PV Panels remain elevated above the ground, permeable access tracks will generally be maintained at existing levels, and formal impermeable infrastructure will be subject to controlled drainage, attenuation and discharge. Construction-related compaction and erosion risks will be controlled through the Outline CEMP [REP4-049] and

Reference	Theme	Question Reference	Question	Comment on Response	Applicant's Response
				SLD suggested that: "In terms of the Applicant's Impact Assessment Methodology set out in Chapter 11 of the ES, Tables 11- 3 to 11-5, the impact magnitude should be "high", the sensitivity should be "high" as there are residential properties at risk downstream, and the significance should thus be 'major'". This is not compatible with a low risk rating.	the Outline SRMP [REP4-053]. The Applicant also notes that the LLFA has subsequently confirmed that it is no longer seeking further scheme-wide hydraulic modelling. Its remaining concerns are focused on implementation, monitoring, management and verification. This is consistent with the Applicant's targeted approach, under which detailed hydraulic modelling is undertaken where the scale and nature of the fluvial interaction justify it, rather than across every

Reference	Theme	Question Reference	Question	Comment on Response	Applicant's Response
					minor watercourse or drainage feature. The Manning's screening outputs therefore do not demonstrate that the Scheme would cause a major adverse effect. Detailed hydraulic modelling has been undertaken where justified, including Gauze Brook through the Hydraulic Modelling Report [REP3-131] and Gabriel's Well / Rodbourne Brook through Lime Down E2 – Hydraulic Modelling Report [REP4-089].
SLD2-008	Human Health	HW1.1 The Council	Mental Health and Wellbeing The ExA note that in your submission	4.1.25. The Applicant's response is not satisfactory and, in SLD's	Requirement 4 in Schedule 2 to the Draft DCO [REP4-004]

Reference	Theme	Question Reference	Question	Comment on Response	Applicant's Response
	Scheme Description and DCO Process		at Procedural Deadline A [PDA-014] there is reference to a good practice Supplementary Planning Document by Suffolk County Council relating to community engagement and wellbeing. Please submit this document into the examination and advise if any discussions have been had with the applicant on producing something similar and securing it within the dDCO.	view, fails to meaningfully engage with the SPD referenced in the ExA's question and the Council's submission at Procedural Deadline A. It is right that the guidance primarily focusses on pre-submission community engagement – however, the suggestions proposed are obviously also relevant to the post-consent engagement process. SLD does not understand on what basis the Applicant has dismissed the proposals in this document. The SPD is likewise clear that “project promoters have a duty to take effective	provides for the establishment of a community liaison group prior to commencement of the authorised development. The Applicant is satisfied that this approach is suitable for managing any concerns of the community prior to and during construction, and during periods of scheduled replacement and decommissioning. The Applicant notes that the SPD referred to applies in Suffolk, and not in the location of the Scheme, and therefore is not applicable. The Scheme will be determined in

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				and robust measures to minimise and mitigate adverse impacts on community wellbeing, during the pre-application, consenting, construction and decommissioning phases of their project." The SPD is plainly relevant to all stages of the project. 4.1.26. The SPD observes that communities in Suffolk which are experiencing the impacts of multiple NSIP schemes "feel the project promoters have, in forming and promoting their proposals, overlooked the adverse impact this has on	accordance with the National Policy Statements for Energy, and whilst applicable local policy can be a material consideration for the Secretary of State, this would not be the case for the SPD referred to as it does not apply in the area of the Scheme.

Reference	Theme	Question Reference	Question	Comment on Response	Applicant's Response
				community well being." Further, "feelings of fear, mistrust, anger and frustration are all reported, along with impacted sleep, and inability to plan for the future, due to the uncertainty created by the proposed development." Parish councillors, in particular, reported "increased levels of emotional distress, because of the demands of the role they play, in supporting the community to navigate the NSIP process" and also "by technical information that is challenging to understand and interpret,	

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				and by the amount of time that needs to be invested in the process.” The SPD demonstrates that community engagement processes in response to NSIP regimes have so far been ineffective. 4.1.27. A robust and detailed communication strategy should be interrogated at this stage, when local communities have the most opportunity to be involved in the process. 4.1.28. There are a variety of recommendations within the SPD that SLD	

Reference	Theme	Question Reference	Question	Comment on Response	Applicant's Response
				consider are reasonable and appropriate for both the pre and post consenting process (and some of these have been done, albeit to too limited an extent). For example: • To establish a panel made up of a group of engaged individuals, who have the confidence of the communities they represent, and who can engage and work with the promoter, without prejudice to any objections they may have to the scheme. • Delivering information regarding the infrastructure programmes to community leaders,	

Reference	Theme	Question Reference	Question	Comment on Response	Applicant's Response
				supported by face-to-face conversations to ensure that community leaders can ask questions, and get responses, in a timely manner. • To recognise that prior to determination of the Development Consent Order and the appointment of lead contractors, design outcomes will remain provisional. Therefore, development of the detailed designs used for the Discharge of Requirements will need to be finalised, in discussion with the panel, before submission	

Reference	Theme	Question Reference	Question	Comment on Response	Applicant's Response
				to the discharging Local Authority. • Maintaining proactive, regular, in person contact with communities, via attendance at parish council meetings. Acknowledging the concerns of the community and working with them to develop a supportive and collaborative dialogue. • Project promoters should consider how parish councils will be supported to understand the technical and complex nature of these projects. Support should be provided from the outset of any proposals	

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				and should be consistent throughout the process. • Consideration should be given to the employment of an independent third party to act as a "relationship manager" between the developers, local authorities, and the impacted communities, to ensure conversations remain positive and helpful. • Project promoters should invest in the development of community assets, as mitigation and enhancement. The identification of relevant assets should be undertaken in close	

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				collaboration with the community, and may include for example, proactively investing in supporting local community events, the enhancement of community buildings such as village halls or places of worship, or public spaces and community organisations, so supporting communities to continue to foster a sense of pride, allyship and belonging. • Consideration should be given to the funding of local mental health organisations, to enable them to mentor those who volunteer to	

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				undertake wellbeing support roles. This would ensure that volunteers receive appropriate training, support, and guidance, and would also reduce the feelings of isolation and overwhelm often described by community leaders in these roles. 4.1.29. Additionally, in the appendix to the document, the SPD sets out a variety of key performance indicators for indicators of community engagement and the safeguarding of community wellbeing. SLD considers that these proposals may offer an	

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				effective form of monitoring. 4.1.30. It is noted that other NSIPs have proposed mental health support services for residents in compulsory purchase areas, such as for Heathrow's third runway. It is unclear why the Applicant does not propose to replicate such services here.	
SLD2-009	Human Health	HW1.3 The Council The Applicant	Mental Health ES Chapter 18 table 18-7 [APP-070] states that emergency hospital submissions resulting from self-harm in the study area are higher than the UK average.	4.1.31. The Applicant's response outlines those health services and health bodies which the Applicant has had communications with. It is noted that no responses were	The Applicant notes this comment and refers to the response provided to 'CM-001' in the Written Summary of the Oral Submissions at the Open Floor Hearing 2

Reference	Theme	Question Reference	Question	Comment on Response	Applicant's Response
			Wiltshire Council: Given the level of public concern and interest generated by the proposed development, the Council is asked to comment on whether the applicant's proposed mitigation of signposting those concerns to existing mental health services is sufficient? The applicant: You are asked to detail any discussions you have had with the existing services referenced in ES Chapter 18 that have informed the approach.	recorded by any of the contacted consultees. The Applicant then asserts, "the absence of interaction from service providers indicated to the Applicant that said service providers were not specifically concerned with the Scheme having an impact on their ability to deliver their services to the affected population." 4.1.32. SLD disputes the inference the Applicant has proposed to draw from their silence. Many of the health services contacted are already overstretched and underfunded and may	and the Applicant's Responses [REP4-088]. In the absence of feedback from mental health providers, the Applicant has been continuing engagement with Wiltshire Council's Public Health team to ensure outstanding concern with regard to mental health and wellbeing are discussed and addressed. The Applicant refers to the Statement of Common Ground with Wiltshire Council [REP4-061] where the Applicant's discussions with Wiltshire Council are set out, including where discussions around

Reference	Theme	Question Reference	Question	Comment on Response	Applicant's Response
				struggle to engage with the DCO consenting process. Their lack of response cannot be inferred as a lack of concern. It is also noted that since September 2024, a significant amount of local interest has been generated in respect of the scheme and it may be their responses would be different now.	mental health mitigation, particularly for the remaining examination and pre-construction phase are still under discussion.
SLD2-010	Landscape and Visual	LV1.6 The Council SLD The Applicant	Landscape Character – Assessment Methodology In the ES [APP-060] the applicant has assessed effects to landscape character relative to each study area (1km, 2km, 5km) as a single receptor rather	4.1.33. The ExA asks whether landscape character areas / types should be included as receptors in the LVIA, which has grouped landscapes by geographical area rather	The Applicant notes these comments and directs SLD to the Applicant's Response to Landscape and Visual Matters in Stop Lime Down Issue Specific Hearing 2 Post

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			than each of the separate landscape receptors (LCTs, LCAs) that make up each study area. The ExA understands that the intention of this approach is to look at the effects of the proposed development on the holistic patchwork of landscape character within each study area. However, it is not clear to the ExA that this approach captures the impacts on the different landscape receptors and the individual characteristics identified in the relevant landscape character assessments. Wiltshire Council and	than by landscape character area / type. 4.1.34. SLD's landscape expert's opinion, as expressed in the response to this question in [REP3-173], is that the Applicant's approach is acceptable for the purposes of this exercise, but it could be improved, and would be helpful. 4.1.35. The Applicant's response to the question states that the exercise is not considered necessary, but could be carried out if of assistance to the ExA.	Hearing Summary [EN010168/EXAM/9.58]

Reference	Theme	Question Reference	Question	Comment on Response	Applicant's Response
			SLD: Wiltshire Council and SLD are asked if they consider that the applicant's approach is acceptable? The applicant: The applicant is asked to either: 1) Provide further justification for its approach including reference to relevant guidance and precedent from other Nationally Significant Infrastructure Project (NSIP) scale solar projects; or 2) Provide an updated assessment defining the effects relative to the separate landscape receptors rather than to each study area as a whole	4.1.36. The reason why the Applicant does not consider the exercise necessary is stated as being because "GLVIA3 does not suggest that an LVIA should consider individual Landscape Character Areas (LCAs) or Landscape Character Types (LCTs) as individual Landscape Receptors, rather that LCAs / LCTs are used to identify the Baseline". 4.1.37. SLD's landscape expert does not agree that GLVIA3 does not suggest this approach. In her opinion, GLVIA3 is clear that the main	

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				purpose of the baseline studies is to identify the receptors which could be affected by the development. The Applicant has identified the LCAs / LCTs in the baseline but has decided not to treat them as 'receptors' in the assessment of effects. 4.1.38. GLVIA3 para. 5.2 states that "... The study area should include the site itself and the full extent of the wider landscape around it which the proposed development may influence in a significant manner. This will usually be based on the extent	

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				of Landscape Character Areas likely to be significantly affected either directly or indirectly..." (emphasis added). 4.1.39. Para. 5.34 states (with emphasis added), "Once the baseline information about the landscape is available this can be combined with understanding of the details of the proposed change or development that is to be introduced into the landscape to identify and describe the landscape effects. • The first step is to identify the components of the landscape that are	

Reference	Theme	Question Reference	Question	Comment on Response	Applicant's Response
				likely to be affected by the scheme, often referred to as the landscape receptors, such as overall character and key characteristics, individual elements or features, and specific aesthetic or perceptual aspects." 4.1.40. Para. 5.44 notes that following the baseline studies, "the value of the Landscape Character Types or Areas that may be affected" should be established (emphasis added). 4.1.41. Para. 5.50 states that "The geographical	

Reference	Theme	Question Reference	Question	Comment on Response	Applicant's Response
				area over which the landscape effects will be felt must also be considered', which may be 'at the scale of the landscape type or character area within which the proposal lies', or 'on a larger scale, influencing several landscape types or character areas" (emphasis added).	
SLD2-011	Landscape and Visual	LV1.7 The Applicant	Landscape Character – Local 1km Study Area The applicant is asked to confirm whether the assessment of landscape character effects within the local 1km study area included the land within the	4.1.42. The Applicant's response states that "the local 1km study area (and indeed all the study areas) includes the land within the boundary of Lime Down A to E".	The Applicant notes these comments and directs SLD to the Applicant's Response to Landscape and Visual Matters in Stop Lime Down Issue Specific Hearing 2 Post

Reference	Theme	Question Reference	Question	Comment on Response	Applicant's Response
			boundary of Lime Down A to E? and: 1) If so, the applicant is asked to justify the reduction in the significance of effect at year 15 of operation given the scale of land-use change within the boundary of Lime Down A to E? If not, the applicant is asked to explain why the landscape character effects within the boundary of Lime Down A to E have not been assessed?	4.1.43. However, LVIA §8.5.14 states that "The... Local 1km Study Area... is the 1km area extending as a radius from the outer boundary of Lime Down A to E". 4.1.44. Para. 8.5.13 states that "The Landscape Fabric of the Solar PV Sites is considered a landscape receptor which will be assessed separately to relevant the following Study Areas" ('fabric' is indeed considered separately as a receptor, but not in isolation, it is an integral part of overall character, so it should also considered in that	Hearing Summary [EN010168/EXAM/9.58]. The Applicant would like to reiterate that the LVIA in ES Volume 1, Chapter 8: Landscape and Visual [REP3-025] does not identify beneficial effects to Landscape Character as a result of the implementation of the landscape scheme during the construction period or operational lifetime of the Scheme, only to Landscape Fabric. It is recognised that developments of this nature directly change the character of the

Reference	Theme	Question Reference	Question	Comment on Response	Applicant's Response
				context, or at the least considered in a manner that avoids double counting). 4.1.45. Yet, §8.5.12 states that "The land associated with the Solar PV Sites A-E themselves is defined as the Landscape Fabric... and the local landscape character", with 'fabric' appearing to have been defined as a combination of landscape elements and overall character. 4.1.46. Clarification of the above would be helpful.	landscape within the boundaries of the Site itself, with the individual fields proposed for infrastructure presenting as a solar array, a change from a 'greenfield' open agricultural farmland to renewables. This change is what then ultimately indirectly impacts the character of the wider receiving landscape. It should be noted that this change is not limited to renewable projects, and that any development of a greenfield site would result in the same level of adverse impact at the site level.

Reference	Theme	Question Reference	Question	Comment on Response	Applicant's Response
				4.1.47. The Applicant's response goes on to say that the reason for the reduction in the overall level of effect that would occur within the local 1km study area is due to maturing screening vegetation. 4.1.48. SLD's landscape expert does not agree that all adverse effects on character can be mitigated by screening views, as many are non-visual - see Appendix B to SLD's WR [REP1-170] §§8.5.18 – 8.5.22. Also, note SLD's comments about over-reliance on vegetation to screen views in the longer term	The Landscape Character change associated with the addition of the array and associated infrastructure, including the changes to land management is considered within the assessment of effects on Landscape Character. The LVIA acknowledges that there would be there would be an immediate change to the character of the Sites themselves and their immediate surroundings as they change from an area of arable farmland to solar infrastructure with the LVIA recording Significant Adverse effects on the character

Reference	Theme	Question Reference	Question	Comment on Response	Applicant's Response
				in section 7.5 of Appendix B. 4.1.49. Most importantly, the reduction in the level of effect only applies to indirect landscape effects, which here would occur a) within the parts of the Order Limits where no infrastructure / associated development is proposed, ie excluding the majority of sites A - E, and b) beyond the Order Limits. 4.1.50. The Applicant's response to this question does not state the levels of direct adverse landscape effects which would occur within the	of the Landscape (including within the Lime Down Sites) through to the establishment of the Mitigation planting as a result of the Scheme and the change from agricultural land to a solar infrastructure. However, the introduction of the solar arrays and other associated infrastructure would not become a defining feature on the landscape once operational, with the establishment of the landscape mitigation by Year 15 reducing adverse effects on

Reference	Theme	Question Reference	Question	Comment on Response	Applicant's Response
				developed parts of Lime Down A – E. 4.1.51. This matter is dealt with in SLD's Appendix B at §§8.4.3 – 8.4.7, but in summary, the Applicant's LVIA did not assess the direct effects that would occur on sites A – E, only on the sites' landscape 'fabric', which it concluded would be Moderate Beneficial (significant). SLD's landscape expert considers this approach to be a departure from the Guidance. 4.1.52. However, subsequently, in [PDA-	Landscape Character to no longer Significant.

Reference	Theme	Question Reference	Question	Comment on Response	Applicant's Response
				009], the Applicant's response to item ref. SLD-024 states, "It is fully acknowledged that at the Site level, the character of the Site itself (where there is infrastructure) would be Significantly Adversely affected with the land now presenting as a large scale solar scheme, as with the development of any green field Site". 4.1.53. At the recent landscape SoCG meeting, SLD's landscape expert asked the Applicant's landscape expert if they could say what the level of the	

Reference	Theme	Question Reference	Question	Comment on Response	Applicant's Response
				direct effect would be, and the response was that it would be the "highest possible level". In the LVIA method (Appendix 8-1 [APP-187]), Table 8.1.1.14, the highest possible level of effects is Major. SLD's landscape expert agrees with this conclusion.	
SLD2-012	Landscape and Visual	LV1.9 The Applicant The Council CNLB SLD	Cotswold National Landscape – Setting The parties are asked to define in spatial terms the extent of the area outside of the boundary of the Cotswolds National Landscape (CNL) that is considered to form the setting of the CNL.	4.1.54. The CNLB's response appears to assume, as originally did SLD's landscape expert, that the Applicant considers the setting of the CNL to extend across the whole of Sites Lime Down A, B and C.	The Applicant considers the setting of the CNL to extend across parts of Lime Down A, B and C, but not across the entirety of the three sites. The Applicant's position is that the setting for the CNL extends as far as to where development or land management proposals, can be

Reference	Theme	Question Reference	Question	Comment on Response	Applicant's Response
				4.1.55. However, SLD's landscape expert queried why, in places, the LVIA had also stated that 'parts' of Sites A, B and C are within the setting. 4.1.56. In the response to this question, the Applicant has now confirmed that 'parts' of Sites A, B and C are within the setting, and has produced plans showing the locations of these parts. 4.1.57. This matter was addressed at ISH2 and is commented upon in the post-hearing submissions above.	considered to have an impact (positive or negative) upon the CNL. The applicant has prepared a plan showing the Spatial Extent of Setting of the CNL which was submitted within the Applicant's Response to the Examining Authority's First Written Questions [REP3-128].

Reference	Theme	Question Reference	Question	Comment on Response	Applicant's Response
SLD2-013	Landscape and Visual	LV1.12 CNLB	Cotswold National Landscape – Special Qualities In its RR, the CNLB states [RR-0944] that it considers it likely that construction traffic would have a significant adverse impact upon the tranquillity of the National Landscape (one of its special qualities). Other than disagreeing with the applicant's assessment of the impact on the special quality of tranquillity, do the CNLB agree with the applicant's conclusions on the assessment of effects on the CNL's other special qualities as summarised in table 18 of the	4.1.58. The CNLB's response refers to CNL Special Quality 5. "Distinctive dry-stone walls", and states that "the restoration of some short stretches of dry-stone wall within the CNL's setting as part of the proposed embedded mitigation... comprises an indirect, negligible beneficial effect to this special quality". 4.1.59. However, in SLD's landscape expert's opinion, this is an example of landscape / visual mitigation being double-counted as landscape / visual enhancement.	The Applicant notes these comments and directs SLD to the Applicant's Response to Landscape and Visual Matters in Stop Lime Down Issue Specific Hearing 2 Post Hearing Summary [EN010168/EXAM/9.58], submitted at Deadline 5. The Applicant is preparing a further technical note on Tranquillity as requested by the ExA which has been submitted at Deadline 5 (Tranquillity Assessment [EN010168/EXAM/9.56])

Reference	Theme	Question Reference	Question	Comment on Response	Applicant's Response
			applicant's ES Appendix 8-6 [APP-197]?	4.1.60. The CNLB's response also refers to CNL Special Quality 6. Flower-rich grasslands.... The CNLB considers this to be "an enhancement associated with the Scheme. Therefore, this comprises an indirect, minor beneficial effect to this special quality". 4.1.61. However, it appears that in LVIA Table 8-18, flower-rich grasslands are in fact mitigation (assuming this is the same as "diverse wildflower meadow").	

Reference	Theme	Question Reference	Question	Comment on Response	Applicant's Response
				4.1.62. SLD's landscape expert agrees with the CNLB's conclusion with reference to Special Quality 9. that "the Scheme would lead to a direct, major/moderate (significant) adverse effect on the tranquillity of the part of the CNL through which construction traffic is to be routed during the Scheme's construction and decommissioning periods".	
SLD2-014	Landscape and Visual	LV1.19 The Council SLD	Visual Impact - Residential Visual Amenity Assessment SLD explains in its Landscape and Visual Impact Report [REP1-170] that it disagrees	4.1.63. The Applicant's response states that the RVAA concludes that the high levels of adverse visual effects that would be experienced by receptors at Grain Store	The Applicant agrees with this position.

Reference	Theme	Question Reference	Question	Comment on Response	Applicant's Response
			with the applicant's approach that a residential visual amenity assessment (RVAA) is not required and states that the level of effect that would be experienced by receptors at Grain Store Barn does cross the threshold for 'full' RVAA. SLD also states that may also be the case for other residential receptors. Wiltshire Council: 1) Do Wiltshire Council agree with the applicant's approach that a RVAA is not required? If it does not, provide reasoning and identify the residential receptors that you consider should be	Barn (which is likely to be the residential property where levels of effects would be highest) would still not trigger the requirement for a 'full' RVAA. 4.1.64. SLD's landscape expert agrees it is unlikely that the Applicant's RVAA would conclude that a 'full' RVAA would be required for Grain Store Barn, and considers it unlikely that this would be required for any of the residential properties adjacent to / in proximity to the Scheme. See also the ISH3 submission above.	

Reference	Theme	Question Reference	Question	Comment on Response	Applicant's Response
			scoped into a RVAA and why? Stop Lime Down: 2) SLD are asked to identify any other receptors they consider should be subject to a full RVAA.		
SLD2-015	Landscape and Visual	LV1.20 The Applicant	Visual Impact – Sequential Views The applicant's assessment of sequential effects in the ES [APP-060] only identified recreational walking routes for assessment. The applicant is asked: 1) To provide an assessment of the sequential effects on the Wiltshire Cycleway.	4.1.65. The Applicant's response states that "The visual effects on individual Bridleways has been fully assessed in the LVIA and considers the more elevated views experienced by horse riders". 4.1.66. SLD's landscape expert cannot find in the LVIA any evidence that "the more elevated views	Paragraph 1.2.9 of the LVIA Methodology in ES Volume 3, Appendix 8-1: Landscape and Visual Impact Assessment Methodology [REP1A-006] states that visual receptors include horse riders. Table 8-9: Viewpoint Locations in the ES Volume 1, Chapter 8: Landscape and Visual [REP3-025] lists the type of receptor

Reference	Theme	Question Reference	Question	Comment on Response	Applicant's Response
			2) To comment on whether cyclists may be differently susceptible to sequential visual effects due to the speed and therefore reduced time between views of different parts of the proposed development. 3) Whether the applicant has identified the commonly used routes for horse riders and considered the sequential visual effects on these routes taking into account the more elevated position of a person on horseback	experienced by horse riders" have been considered, and it would be helpful to know exactly how and where this was factored in. For example, the Applicant's Zone of Theoretical Visibility (ZTV) plans (see for example [APP-097] Figure 8-8) are based on observer height of 1.7m, so eye-level c. 1.6m, whereas the average eye-level of an equestrian is c. 2.4m.	for each Viewpoint and this includes horse riders. Although horse riders are not specifically mentioned in the assessment of visual effects, the effects of the Scheme on Bridleways represents the worst-case scenario and the more elevated views of horse riders by default. With reference to the comments on the eye height used in the ZTVs, the Applicant notes Paragraph 6.11 of GLVIA3 which states: <i>"Both ZTV mapping and site survey should assume that the observer eye height is some 1.5 to 1.7 metres</i>

Reference	Theme	Question Reference	Question	Comment on Response	Applicant's Response
					<i>above ground level, based on the midpoint of average heights for men and women. The assumed eye height used must in any case be clearly stated".</i>
SLD2-016	Other Environmental Matters – Glint and Glare	LV1.28 The Applicant SLD	Glint and Glare – Stop Lime Down Assessment SLD provided a Glint and Glare Assessment at D1 [REP1-178]. The applicant is asked to consider the conclusions and recommendations set out in SLD's assessment, and in the forthcoming SoCG between the parties, the applicant and SLD are asked to set out where	4.1.67. See the Glint and Glare section above which discusses key outputs from the meeting between the Applicant and SLD. SLD will continue to engage with the Applicant on these matters, and considers important considerations remain to be explored in respect of the Glint and Glare assessment and	Please refer to the Glint and Glare section above, where the Applicant has responded to specific matters raised by SLD.

Reference	Theme	Question Reference	Question	Comment on Response	Applicant's Response
			agreement can be found in relation to the assessment methodology, including but not necessarily limited to: • The model output data. • The assessment of impact on local roads. • Impact significance definition. • How the cumulative footprint of the proposed development is assessed, including in relation to Badminton and Bowldown Farm Airfields. • The assessment of train driver safety.	the guidance adopted by Pager Power.	
SLD2-017	Noise and Vibration	NV1.3 The Applicant	132 kV Substation Operation Paragraph	4.1.68. It is noted that in noise assessment terms	The Applicant can confirm that daytime has

Reference	Theme	Question Reference	Question	Comment on Response	Applicant's Response
			14.4.20 of ES Chapter 14 [REP1-021] states that the 132kV substations are only to be operational during the daytime. Can the applicant explain why this is the case and whether any controls are required or in place to regulate this?	night time is typically described as 23:00 to 07:00. SLD invite the Applicant to specify the hours which have been assessed as "daytime" or "daylight" for the purposes of the noise assessment.	been assessed as 07:00 to 23:00 in the noise assessment; see for example, Table 14-23 of ES Volume 1, Chapter 14: Noise and Vibration [REP1-021] .
SLD2-018	Noise and Vibration	NV1.5 The Council	BS 4142:2014 and Operational Noise Effects Paragraph 14.6.33 of ES Chapter 14 [REP1-021] states that 'where background levels are low, the absolute levels might suggest a more acceptable outcome than would otherwise be suggested by the	4.1.69. In respect of the Council's comments that "Background sound levels during the daytime did not fall below 30dB at any noise- LA90 sensitive receptor", SLD points to its WR at Appendix H [REP1-179] where such figures for LT12 are identified. It is also noted that the	While background levels in general can fall below 30 dB, typical daytime levels at noise sensitive receptors do not. This is evidenced by Table 1 in Volume 3, Appendix 14-3: Baseline Noise Survey [APP-236] (noting LT7 was not used in the assessment). While it is possible that

Reference	Theme	Question Reference	Question	Comment on Response	Applicant's Response
			difference between the values (existing and proposed noise rating levels). As such, where background noise levels are identified as being below the 'very low' threshold of 30dB, a background noise level of 30dB LA90 has been adopted with respect to the setting of operational noise LOAEL and SOAEL.' The ExA note in row 3 of Table 14-2 of ES Chapter 14, that the Council confirmed the use of 30dB as a minimum background noise level to be appropriate at the scoping stage. However, SLD's expert's	Applicant's approach to background measurement, including the locations chosen, mean the most tranquil locations may have been missed. SLD refers back to its Appendix H.	there are locations away from roads in the area that are even quieter than the areas measured in the baseline survey, the baseline survey levels are considered robustly representative of residential properties in the study area.

Reference	Theme	Question Reference	Question	Comment on Response	Applicant's Response
			submission at D1 [REP1-179] casts considerable doubt on the appropriateness of this methodology and the applicant's justification for it. SLD's expert states (amongst other things) that the applicant's methodology ignores the context of a very quiet rural area and adopts a "one size fits all approach", which artificially elevates the baseline and thus minimises the noise effects of the development on sensitive receptors. It also provides examples of this in action for several residential		

Reference	Theme	Question Reference	Question	Comment on Response	Applicant's Response
			receptors (Townleaze Farm and Bradfield Manor). The Council is requested to review SLD's submission [REP1-179] and advise the ExA whether it still agrees with the applicant's justification for using an absolute background noise level of 30dB, or if (and why) it now agrees with SLD's concerns that raising the baseline in this way modifies the relevant thresholds for the LOAEL and the SOAEL and thus underplays the noise effects.		
SLD2-019	Noise and Vibration	NV1.6 The Applicant	Operational Noise Results Summary Table 14-23 of ES Chapter 14	4.1.70. Without repeating all of SLD's submissions, it is noted that the	The Applicant has already clarified how compliance with National

Reference	Theme	Question Reference	Question	Comment on Response	Applicant's Response
			[REP1-021] presents the operational noise results summary. It records zero receptors above SOAEL during the day and night-time periods. However, Table 9 of ES Appendix 14-4 [REP1-061] reports Receptors R10 (Bradfield Farm) and R20 (Townleaze Farm) experiencing a SOAEL at night-time. The applicant is required to review this discrepancy along with the statement made in paragraph 14.10.51 of ES Chapter 14, which states these receptors experience adverse effects between LOAEL and SOAEL during the night-time. If on review,	Applicant only undertakes to avoid SOAEL effects in the final design. SLD again have concerns that this does not demonstrate proper compliance with the NPSE and the obligation to mitigate LOAEL effects. Mitigation measures should be considered and assessed so that the ExA can be satisfied of the avoidance and mitigation now.	Policy, including mitigation of noise levels between LOAEL and SOAEL, has been met in items SLD-223 and SLD-245 of the Applicant's Response to Written Representations [REP2-039] . The commitment to avoid significant adverse operational noise effects is made within Table 8 of the Outline OEMP [REP4-051] and is therefore in place now.

Reference	Theme	Question Reference	Question	Comment on Response	Applicant's Response
			the operational noise at the aforementioned receptors would be above or equal to SOAEL, the ExA requires an additional analysis setting out proposed mitigation to reduce the noise impact (this is without prejudice to the methodology positions raised in ExQ1 NV1.5 above).		
SLD2-020	Noise and Vibration	NV1.7 The Applicant	Receptors R10 and R20 The applicant is required to explain the statement made in paragraph 14.10.52 of ES Chapter 14 [REP1-021] that the night-time rating level at Receptors R10 and R20 can be defined as being a low rating level,	4.1.71. It is noted that, even in the Applicant's own assessment, the 35 dB L is described "at the higher end of what may be termed low". It is Ar, Tr clear that the Applicant itself recognises it is taking the most favourable	The Applicant would like to clarify that the adopted definition of SOAEL, as 5 dB above the background down to a minimum background of 30 dB, is the least favourable definition it is aware of in any solar farm application. For

Reference	Theme	Question Reference	Question	Comment on Response	Applicant's Response
			particularly in light of paragraph 14.6.31 which states that 'BS 4142 does not define 'low' in the context of background sound levels nor rating levels. The note to the Scope of the 1997 version of BS 4142 defined very low background sound levels as being less than about 30 dB LA90, and low rating levels as being less than about 35 dB L.' (Bold text is ExA's Ar,Tr emphasis).	interpretation it can adopt to reach this conclusion. SLD does not agree with that interpretation in any event.	example, consider the consented Tillbridge Solar DCO [S.I. 2026/487] where SOAEL was defined as 10 dB above background down to a minimum rating level of 45 dB during the day and 40 dB at night.
SLD2-021	Noise and Vibration	NV1.9 The Applicant	Receptors Table 14-11 of ES Chapter 14 [REP1-021] defines the types of receptors that sit within high, medium and low noise sensitivity	4.1.72. Without repeating all of SLD's submissions on noise on PRoWs, it is noted that the Applicant aligns the noise that will be experienced to "range	Considering the context that the 50-60 dB levels would only be apparent in the immediate vicinity of the conversion units, and elsewhere levels

Reference	Theme	Question Reference	Question	Comment on Response	Applicant's Response
			categories. The applicant states it has used ISEP Guidelines for Environmental Noise Impact Assessment (2014) to define potentially affected receptors and their sensitivity level; however, the ISEP Guidelines includes farms, open air amenities (for example public rights of way and areas of landscape value) and wildlife sites and fauna as possible receptors that may need to be considered. Such receptors are notably absent from the applicant's Table 14-11 and the noise and vibration assessment	from imperceptible to the level of regular conservation (50-60 dB)". SLD consider being in that range means that the electrical noise of the Scheme will have the propensity to also interrupt such regular conversation on a PRow, significantly interrupting enjoyment and dissuading use.	would be well below this, as evidenced by Figure NV1.9 of the Applicant's response to the Examining Authority's First Written Questions [REP3-128] , the Applicant considers that enjoyment and use of the PRow would not be significantly impacted as a result of operational noise from the scheme.

Reference	Theme	Question Reference	Question	Comment on Response	Applicant's Response
			generally. NPS-EN-1 recognises at paragraph 5.11.30 that 'Public Rights of Way, National Trails, and other rights of access to land are important recreational facilities for example for walkers, cyclists and horse riders. The Secretary of State should expect applicants to take appropriate mitigation measures to address adverse effects...' Similarly, NPS EN-3 at paragraph 2.10.42 provides that applicants 'are encouraged to design the layout and appearance of the site to ensure continued recreational use of public		

Reference	Theme	Question Reference	Question	Comment on Response	Applicant's Response
			rights of way where possible during construction, and in particular during operation of the site.' The applicant is required to rectify the deficiencies noted above in the applicant's noise and vibration assessments with regard to potential effects on walkers, cyclists and horse riders within close proximity to the Order limits and the construction traffic routes. Whilst the ExA acknowledge that the use of PRow or roads by those receptors may be linear and transient, we note that plant noise hum is expected to be		

Reference	Theme	Question Reference	Question	Comment on Response	Applicant's Response
			permanent and continuous throughout the 60 year operational period, such that it could reduce the use, tranquillity and enjoyment of the area. As such, the ExA expects the noise effects of the proposed development on those receptors to be appropriately considered by the applicant or robustly justified in its absence.		

5 The Applicant's Response to Host and Neighbouring Parish Councils

5.1 Hullavington Parish Council

Table 5-1

Reference	Theme	Issue	Comments	Applicant's Response
HPC-001	Transport and Access	Land Permissions	Hullavington Parish Council (is writing to bring to the Examining Authority's attention the recent installation of survey cameras in Hullavington Parish on the Norton Road, near the Fosse Way junction and on the Down Lane and potentially other places in the area. We understand from the Lime Down solar park applicant that these have been set up to conduct an active traveller survey on your request. While we appreciate the need for traffic and user data, local residents have raised concerns regarding the lack of visible signage accompanying these cameras. To ensure local confidence and full compliance with standard procedures, we would be grateful if the Examining Authority could seek clarification from the applicant on a few key points:	The Applicant has responded directly to Hullavington Parish Council regarding the purpose and placement of these camera's following the request for further survey data to be obtained. The Applicant has sought the necessary licences required in connection with the surveys undertaken in May 2026 and July/August 2026. The relevant licensing requirements have therefore been appropriately considered and addressed in relation to both periods of survey work.

Reference	Theme	Issue	Comments	Applicant's Response
			1. Highway & Landowner Permission: Were the necessary consents and licences obtained from Wiltshire Council (as the highway authority) or the relevant landowner prior to installation?	
HPC-002	Transport and Access	GDPR	2.Data Protection & Transparency: Under UK GDPR and ICO guidance, public camera surveys typically require clear signage at the site informing passers-by that recording is taking place, who is managing the data, and the purpose of the study. Could the applicant confirm: Why no visible privacy signage was in place during the survey? What lawful basis is being used for data collection, how the footage is being stored/handled, and when it will be deleted?	The Applicant's privacy notice can be viewed at the following link, which explains how data is handled on the project: https://www.limedownsolar.co.uk/privacy-policy Also see response to HPC-001.
HPC-003	Transport and Access	GDPR	Because data gathered in public spaces needs to meet standard legal requirements, we ask that the applicant confirms these compliance details before the survey results are formally admitted into the examination record.	The Applicant confirms that it has complied with the relevant data protection legislation. The Applicant's privacy notice can be viewed at the following link: https://www.limedownsolar.co.uk/privacy-policy

Reference	Theme	Issue	Comments	Applicant's Response
				The results from the traffic surveys have will be submitted as part of the examination at Deadline 6 in the documents where they are relevant, such as ES Volume 1, Chapter 13: Transport and Access[REP4-014].
HPC-004	Transport and Access	Traffic Survey	We would also like to gently remind the Authority that active travel safety concerns along Norton Road—particularly around the narrow railway bridge—have been highlighted by both our Parish Council in writing and by Wiltshire Council's Transport representative at the Issue Specific Hearing on 2nd July 2026. We hope any survey data will be considered alongside those existing safety considerations.	The Applicant makes note of this comment, the purpose of the additional survey data is to provide further understanding of active travel safety along this section of highway.
HPC-005	Transport and Access	Traffic Cameras	Requested Action: We respectfully ask the Examining Authority to: • Request written clarification on the above points from the applicant. • Ensure the data meets standard UK GDPR requirements prior to reliance on its findings.	The Applicant has provided responses to this at references HPC-001 to HPC-004 of this document.

Reference	Theme	Issue	Comments	Applicant's Response
			Include this note in the formal examination record.	

6 The Applicant's Response to Parties Mentioned in the Book of Reference

6.1 John Baillie – Further Information Requested by the ExA

Table 6-1

Reference	Theme	Issue	Comments	Applicant's Response
JB-001	Site Selection and Alternatives Ecology and Biodiversity	Questions to the Applicant	As requested at the CAH1 meeting I have <u>attached the map</u> of my property showing virtual all my fields being included in the Compulsory Acquisition declaration by Lime Down. Following the meeting I had a phone call and email from Dalcour Maclaren wishing to meet to discuss the points of concern I raised at the CAH1 hearing. I replied promptly by email suggesting an agenda for discussion which included the points from the meeting. As of today 10.07.26 I have had no response. Points suggested from that email listed below, "1. My agents fees being agreed and paid. 2. Drainage issues both on the track of the cable and on the effect the solar	1. Mr Baillie's agent fees have been agreed with the agent and set to be paid. 2. As previously mentioned, an independent drainage expert will be reviewing the drainage to try and ensure there is not damage/ fault in the current drainage on the land. Mr Baillie has provided some annotated maps which in turn will be reviewed by the engineering team to cause minimal damage. 3. The Applicant understands there is a stewardship scheme on the land of which the value of this stewardship scheme

Reference	Theme	Issue	Comments	Applicant's Response
			installation will have on my field drainage. 3. Compensation for the agreement making me ineligible to apply for SFI26 scheme and resultant payments. 4. 22 hectares of my land being included in the agreement when less than 0.5 hectares is required for cable route. 5. Access to my land via the B.O.A.T. From Hullavington during the construction period. 6. Results of wildlife survey including badgers. 7. Modification of the cable route. These are a few of the items I feel we need to discuss and I am happy for you to add more topics if you wish." My agent added that he needed the general Heads of Terms agreed which includes burying the cable to 1.2 m. ,before it is worth discussing land specific problems.	compensation of which will be considered through the provisions of the Land Compensation Act 1961, the Land Compensation Act 1973 4. Whilst the project continues to undertake surveys, route refinements and project reviews, the option area has remained large. The option area has already been reduced, and will continue to be reduced whilst more results/ refinements are able to be reviewed. The Applicant notes the comment regarding access via the Byway Open To All Traffic (B.O.A.T). 5. All habitat survey information, including habitat recorded at Mr Baillie's land, is provided in ES Volume 3, Appendix 9-1: Ecological Baseline Report [REP4-019] and ES Volume 2,

Reference	Theme	Issue	Comments	Applicant's Response
				Figure 9-1-13 to 9-1-24: Baseline Habitats Map – Cable Route Corridor [REP1-036]. With regard to badgers, no active badger setts were recorded within the Order Limits where they intersect Mr Baillie's land during surveys undertaken on behalf of the Applicant. The Applicant can confirm that badger setts have been recorded on land in close proximity to Mr Baillie's land; however, the precise locations of these setts cannot be disclosed as this information is confidential. 6. The cable route is being continuously reviewed with survey results continuously updating the route. In relation to the cable route, The Applicant is continuing to work with the

Reference	Theme	Issue	Comments	Applicant's Response
				agent to come to an agreement on the wording for the cable depth clause.

7 The Applicant's Response to Members of the Public and All Remaining Organisations and Businesses

7.1 January Farrington – Comments of Response to the ExA's First Written Questions

Table 7-1

Reference	Theme	Issue	Comments	Applicant's Response
JF-001	Socio-Economics, Tourism and Recreation	Equine Sector Questionnaire	I write as an Interested Party in the above examination to raise procedural concerns about the equine sector questionnaire recently issued by the applicant (IGP/Lime Down Solar Park) in response to the Examining Authority's question SE1.9. I would be grateful if the ExA would consider the matters set out below before the questionnaire responses are submitted and relied upon as part of the examination record. I do not raise these matters to obstruct the process, but because I believe the questionnaire as currently constituted cannot produce a reliable or complete picture of equine receptor impacts, and because I believe the ExA is best placed to address this before that evidential gap becomes embedded in the record.	The Applicant notes this comment and refers to the Equine Business Report [EN010168/EXAM/9.62] submitted at Deadline 5 where the Questionnaire and Report Methodology is explained.

Reference	Theme	Issue	Comments	Applicant's Response
JF-002	Socio-Economics, Tourism and Recreation	Equine Sector Questionnaire	1. Named Interested Parties have not received the questionnaire The most significant concern I wish to bring to the ExA's attention is that I have already been informed by three registered Interested Parties, [REDACTED] have received no questionnaire at all. All three are existing IPs in this examination and are therefore known to the process. Their non-inclusion is not a question of being difficult to identify; they are already on the examination register. A fourth registered IP, [REDACTED], has confirmed she received a hard copy of the questionnaire only not the email version sent to others. The inconsistency in delivery method is itself notable and suggests the applicant's contact methodology was not applied consistently. This confirms that the applicant's contact list is incomplete in a demonstrable and verifiable way. It also raises the question of how many other equine businesses and users less visible than registered IPs have similarly been overlooked. The ExA is respectfully asked to require the	A structured questionnaire was issued to over 30 equestrian facilities and ancillary businesses within the 5km study area to inform the Equine Business Report [EN010168/EXAM/9.62]. Private equestrian facilities were not included. Personal details submitted to the examination are not disclosed to the Applicant and so questionnaires were only able to be sent to publicly available email or physical addresses, or those directly disclosed via previous communications to the Applicant, to make contact with identified equestrian businesses. Section 1.3: Approach to Assessing Potential Impacts on Employment and Business Viability; sets out how businesses were identified and their preferred communication method where this was email or post.

Reference	Theme	Issue	Comments	Applicant's Response
			applicant to provide an explanation of the steps taken by the applicant addressing the ExA's first questions	
JF-003	Socio-Economics, Tourism and Recreation	Equine Sector Questionnaire	2. The contact list has not been disclosed When asked to share the names of businesses contacted, IGP declined, stating that non-disclosure was to ensure responses are provided "independently and directly." I do not accept that this is a sufficient justification. Knowing who has been asked does not compromise the independence or integrity of anyone's response. Transparency about who has been contacted is essential for the ExA and for Interested Parties to have any confidence in the completeness of the exercise. Without it, there is no way to identify gaps.	In response to the request for the Applicant to submit a map showing the location of equestrian facilities with a commentary of the name, address and business activities, the Applicant has provided these at Error! Reference source not found. of Equine Business Report [EN010168/EXAM/9.62] submitted at Deadline 5. The Applicant has mapped equestrian facilities within the 2 km Study Area of the Scheme, with supporting services, such as equine healthcare, dentistry and veterinary practices, and farriers identified within the 5 km Study Area. This list is based on locations identified in ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241], locations declared through representations made during the examination to date, and responses

Reference	Theme	Issue	Comments	Applicant's Response
				to the questionnaire issued to inform this report.
JF-004	Socio-Economics, Tourism and Recreation	Equine Sector Questionnaire	3. The questionnaire scope does not reflect the nature of the equine sector in this area IGP has confirmed the questionnaire was sent to equine businesses and practitioners within approximately 5km of the scheme. This is inconsistent with the ExA's own question SE1.3, which challenged the applicant's use of a 20km study area for socioeconomic assessment, and appears designed to produce a more limited picture than the examination requires.	The Applicant notes this comment and refers to the Equine Business Report [EN010168/EXAM/9.62] where the review has considered the various categories of equestrian facilities, including stud and bloodstock operations, livery yards, riding schools, eventing operations and private paddocks located within a 5km Study Area of the Scheme (to align with that used in the ES); for a review of supporting industries / supply chain, a much wider Study Area equating to 20km has been used.
JF-005	Socio-Economics, Tourism and Recreation	Equine Sector Questionnaire	More fundamentally, the questionnaire as framed reflects a misunderstanding of the equine sector it purports to assess. I would respectfully draw a distinction the applicant appears not to have made, between two very different categories of equine user: First, there are commercial equine businesses, breeding studs, training	The Applicant notes this comment and refers to the Equine Business Report [EN010168/EXAM/9.62] The desk-based review was used to determine the location of private facilities using aerial or satellite photography (Google), and where advertising for equine businesses could

Reference	Theme	Issue	Comments	Applicant's Response
			yards, livery operations and specialist experts all whose turnover depends on the ability to exercise horses safely and whose business model would be directly undermined by years of heavy construction traffic on narrow lanes. The impacts on these businesses are economic, for safety reasons and not merely amenity-based. The proprietors of West Park Stud, Ladyswood Stud, Park Farm and other registered equine IPs fall into this category. Second, there are private households who keep horses at home, for family use, pleasure riding or competition. These households rely on the same bridleways, the same farriers and vets, and the same quiet lanes as commercial operators. They represent, in all likelihood, the majority of equine users in this area. They have been wholly excluded from this questionnaire. The questionnaire conflates these categories without distinction. The result is that the most materially significant category, commercial equine businesses whose viability is at risk, is being assessed	be linked to a location, either through online mapping services, business websites, directories of equine-related businesses, or where suitable through Companies House. These methods were also used to understand the type of businesses being affected, supplementing information received through statutory consultation or found by the Applicant team on-location. The results of this identification process were set out in Table 2-10 in ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]. This table also then set out the high-level consideration of whether or not significant effects from the Scheme were likely to be anticipated, and from this whether or not an equestrian facility should be assessed in greater detail. The Applicant considered this approach to be the most robust available at the statutory consultation stage based on

Reference	Theme	Issue	Comments	Applicant's Response
			using the same framework as recreational amenity, which is an inadequate basis for the examination's purposes.	the amount of information able to be gathered. The Applicant acknowledges that this method was not able to be entirely comprehensive, as there were equestrian facilities that were not able to be accurately identified due to minimal advertising, difficulties in distinguishing features on aerial photography, where websites did not display a location or address, or where registered addresses on Companies House were different from the location of the facility itself. The Applicant has sought to address additional equestrian facilities that it has been made aware of during the examination process and has, where relevant, provided a written response to demonstrate how the assessment of that facility would have been undertaken if included in ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241].
JF-006	Socio-Economics,	Equine Sector Questionnaire	3a. The equine supply chain has been ignored entirely There is a further dimension of economic impact the	The Applicant notes this comment and refers to Section 3.4 in the Equine Business Report

Reference	Theme	Issue	Comments	Applicant's Response
	Tourism and Recreation		questionnaire does not address at all: the businesses that exist to service commercial equine enterprises. A breeding stud or training yard of any scale generates substantial and regular income for equine vets, farriers, feed and forage merchants, bedding suppliers, equine transport contractors, and specialist equine equipment and tack retailers. They are not registered as IPs so have these businesses been asked to complete questionnaires? Vets and other specialist services may be outside this 5km radius yet still very active within the area.	[EN010168/EXAM/9.62] where potential effects on supply chains to equestrian businesses are anticipated to arise principally during the construction phase of the Project rather than during operation. Construction activities would be temporary and progressive in nature, occurring over a finite period and across different locations at different times. As a result, individual equestrian facilities and businesses would not be expected to experience the maximum extent of construction-related effects continuously throughout the construction programme.
JF-007	Socio-Economics, Tourism and Recreation	Equine Businesses	Were West Park Stud, Ladyswood Stud or other local equine enterprises to reduce or cease operations as a direct consequence of the construction period and because horses cannot safely handled, exercised, because clients withdraw animals due to welfare and safety concerns or because the	The Applicant notes this comment and refers to the Equine Business Report [EN010168/EXAM/9.62] where the Applicant has reviewed Potential Construction Impacts in Section 4.2 on both West Park Farm Stud and Ladyswood Stud as well as other local equine business. The Applicant has

Reference	Theme	Issue	Comments	Applicant's Response
			commercial viability of the business is undermined, the economic consequence would ripple outward through this supply chain. The applicant has made no assessment of this secondary economic impact. The ExA should be invited to note that the socio-economic assessment is incomplete in this respect.	reviewed the likely indirect economic impact to the supply chain and has determined there is no significant effect to wider equine-related businesses in the supply chain.
JF-008	Socio-Economics, Tourism and Recreation	Equine Sector Questionnaire	4. Whether this questionnaire is a proportionate request The questionnaire asks respondents to provide detailed financial information including business income and operating costs. This information is by its nature highly commercially sensitive. Recipients have been given no assurances about how this information will be used, who will have access to it, where it will be stored or for how long. There is no precedent in my experience of planning applications for neighbouring landowners and businesses to be required to disclose this level of financial detail to an applicant.	The Applicant notes this comment. The Applicant sought only to request financial information on a voluntary basis to inform its assessment of economic impacts to equine business, as had been requested by the Examining Authority. Whilst only limited information on turnover and financial performance has been shared by businesses due to commercial sensitivities, this data was useful to record primary income sources including livery services, competition and training activities, breeding operations, bloodstock sales, veterinary services and grazing.

Reference	Theme	Issue	Comments	Applicant's Response
			I would ask the ExA to consider whether the request for sensitive financial information of this nature, directed by a private company to neighbouring businesses without any stated data-handling framework, is a proportionate exercise in the context of this examination, and if so, to provide guidance on what protections respondents can expect.	Several businesses also reported operating at or near full capacity, with waiting lists or high occupancy rates (this is in contrast to some of the observations at national level). Staff costs were consistently identified as the largest operating expense.
JF-009	Socio-Economics, Tourism and Recreation	Equine Sector Questionnaire	5. The timeframe has been unreasonably short The initial questionnaire email gave recipients five working days to respond. The deadline has since been extended to 13 July 2026, but this remains a tight window for what is being asked, particularly given the volume and sensitivity of information requested, and the fact that the applicant has demonstrably been preparing this questionnaire for some time (the questionnaire was referenced in conversation with Dermot Farrington and Andrew Privas during the	The Applicant notes this comment and confirms recipients were provided with a two-week period to respond, which is deemed a respectable duration of time. The Applicant also wanted to ensure the Equine Business Report [EN010168/EXAM/9.62] was complete for review during examination.

Reference	Theme	Issue	Comments	Applicant's Response
			applicant's accompanied site visit, prior to its circulation).	
JF-010	Socio-Economics, Tourism and Recreation	Equine Sector Questionnaire	I would be grateful if the ExA would: 1. Require the applicant to explain how the contact list was compiled.	The Applicant notes this comment and refers to the Equine Business Report [EN010168/EXAM/9.62] . The desk-based review was used to determine the location of private facilities using aerial or satellite photography (Google), and where advertising for equine businesses could be linked to a location, either through online mapping services, business websites, directories of equine-related businesses, or where suitable through Companies House. These methods were also used to understand the type of businesses being affected, supplementing information received through statutory consultation or found by the Applicant team on-location. The results of this identification process were set out in Table 2-10 in ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables

Reference	Theme	Issue	Comments	Applicant's Response
				[APP-241]. This table also then set out the high-level consideration of whether or not significant effects from the Scheme were likely to be anticipated, and from this whether or not an equestrian facility should be assessed in greater detail. The Applicant considered this approach to be the most robust available at the statutory consultation stage based on the amount of information able to be gathered. The Applicant acknowledges that this method was not able to be entirely comprehensive, as there were equestrian facilities that were not able to be accurately identified due to minimal advertising, difficulties in distinguishing features on aerial photography, where websites did not display a location or address, or where registered addresses on Companies House were different from the location of the facility itself. The Applicant has sought to address additional equestrian facilities that it has been made aware of during the

Reference	Theme	Issue	Comments	Applicant's Response
				examination process and has, where relevant, provided a written response to demonstrate how the assessment of that facility would have been undertaken if included in ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241] .
JF-011	Socio-Economics, Tourism and Recreation	Equine Sector Questionnaire	2. Confirm whether it considers the 5km, businesses-only scope of the questionnaire to be adequate to address SE1.9, or whether a broader exercise is required, in particular whether commercial equine businesses, private equine households, and the equine supply chain should each be assessed as distinct receptor categories.	The Applicant has provided these at Annex A of Equine Business Report [EN010168/EXAM/9.62] submitted at Deadline 5. The Applicant has mapped equestrian facilities within the 2 km Study Area of the Scheme, with supporting services, such as equine healthcare, dentistry and veterinary practices, and farriers identified within the 5 km Study Area. This list is based on locations identified in ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241], locations declared through representations made during the examination to date, and responses to the questionnaire issued to inform this report.

Reference	Theme	Issue	Comments	Applicant's Response
JF-012	Socio-Economics, Tourism and Recreation	Equine Sector Questionnaire	3. Consider whether the request for sensitive financial information is proportionate and provide guidance on data handling protections for respondents.	The Applicant confirms that the request for financial information to assist the assessment of economic impacts was voluntary only. Whilst only limited information on turnover and financial performance has been shared by businesses due to commercial sensitivities, this data was required to record primary income sources including livery services, competition and training activities, breeding operations, bloodstock sales, veterinary services and grazing.
JF-013	Socio-Economics, Tourism and Recreation	Equine Sector Questionnaire	4. Note for the record that the household equine community and the equine service supply chain appear to have been excluded from this exercise and have not been assessed as receptor categories.	The assessment adopts a holistic approach to evaluate the Project's potential effects on horse health and welfare, the economic viability of equestrian businesses, and the wider equestrian sector. The assessment is informed by specialist veterinary input, questionnaire findings, relevant case studies (Annex B of the Equine Business Report [EN010168/EXAM/9.62]) and desk-based research, enabling the

Reference	Theme	Issue	Comments	Applicant's Response
				consideration of both direct impacts on equestrian receptors and indirect impacts on supply chain and ancillary businesses. Section 3.4 also assesses local equestrian facilities and supply chain.
JF-014	Socio-Economics, Tourism and Recreation	Equine Sector Questionnaire	I intend to engage with the questionnaire process and will submit a response before the 13 July deadline. However, I believe these structural issues with the exercise need to be addressed at the procedural level before the results are treated as a complete or reliable evidential basis. I am happy to provide further information if that would assist the ExA.	The Applicant notes this comment.

7.2 January Farrington – Further Information Requested by the ExA

Table 7-2

Reference	Theme	Issue	Comments	Applicant's Response
JF2-001	Socio-Economics, Tourism and Recreation	Introduction	THE EQUESTRIAN SETTING OF THE LIME DOWN SOLAR PROJECT Evidence relating to the Characterisation and Sensitivity of the Equine Environment around the Lime Down Solar Project Submission to the Examining Authority at Deadline 4 Lime Down Solar Park Development Consent Order (EN010168) Unique Reference Number: [REDACTED] 1. Purpose of this Submission 1.1. This submission has been prepared to assist the Examining Authority in understanding the character and importance to the local economy of the equestrian setting surrounding the proposed Lime Down Solar. During the Examination a considerable amount of evidence has emerged from local equestrian businesses, horse	The Applicant notes this comment.

Reference	Theme	Issue	Comments	Applicant's Response
			owners, professional riders, parish councils and other Interested Parties which suggests that the importance of equestrian businesses and riding of all types in the areas surrounding the scheme is considerably more extensive and diverse than is reflected within the Applicant's Environmental Statement. This document seeks to draws that evidence together into a single overview. It has been prepared from information gathered during the Examination, Relevant Representations, local knowledge, site visits, discussions with equestrian businesses and organisations, together with a detailed mapping exercise undertaken to identify equestrian properties and the network of roads and Public Rights of Way regularly used for exercising horses. Relationship to the ExA's First Written Questions	

Reference	Theme	Issue	Comments				Applicant's Response
			ExA Question	Principle Issue	Where addressed		
			SE.1.9(2)	Business viability and employment	Sections 5, 7 and 8		
			SE.1.9(93)	Mapping of equestrian facilities	Appendix Fig 1 and 2		
			SE1.3	Socio-Economic study area methodology and wider equine economy	Sections 5 and 7		
			SE1.2	Agricultural and Rural	Section 5, 7 and 8		

Reference	Theme	Issue	Comments				Applicant's Response
				Employment			
			TT1.13	Receptor Sensitivity	Section 6		
			TT1.18	Non-Motorised User Delay, Amenity, Severance and Safety.	Sections 4 and 6		
JF2-002	Socio-Economics, Tourism and Recreation	Equine Impacts	1.2. The purpose of this submission is not to suggest that the presence of horses should prevent development in principle. Rather, it is to demonstrate that the receiving environment has particular characteristics which require careful consideration when assessing the likely significance of environmental effects. Unlike many recreational receptors, equestrian activity within this locality is not confined to individual facilities or				The Applicant notes this comment and refers to the Equine Business Report [EN010168/EXAM/9.62] where the interconnected network has been assessed as a commercial business, breeding enterprise and community use of PRow's and bridleways. Section 4 assesses the potential impacts on business viability as a whole

Reference	Theme	Issue	Comments	Applicant's Response
			isolated Public Rights of Way (PRoWs). It comprises an interconnected network of commercial businesses, elite sport, breeding enterprises, recreation, heritage and community participation which depend upon the same rural roads, lanes and bridleways affected by the Proposed Development. It is this interconnected setting, rather than any individual equestrian property, that forms the principal receptor.	covering both construction and operational concerns. Re-routing or temporary closure of bridleways and byways may be required during peak construction times to minimise risk of impacts to equestrian users. These public rights of way are likely to be in transient use and therefore this reduces the extent to which this risk to horses in the area will arise. Bridleways, and other routes used by equestrians likely to be affected by the Scheme during construction are summarised in ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068], with the assessment of individual receptors set out in Section 3.4 of ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]. A total of 31 bridleways, byways, and unsurfaced roads were included within the assessment. The Applicant has provided mitigation measures to public rights of way users

Reference	Theme	Issue	Comments	Applicant's Response
				including, but not limited to, warning signage, provision of banksmen at locations HGVs may need to cross or use sections of PRowS and closing or diverting PRowS where construction activities would directly interact with PRow use. As recommended, the Applicant is also able to provide signage for alternative routes for equestrian users of bridleways and byways, so that risks to equines and their riders and handlers can be minimised without also stopping pedestrians and cyclists from using these routes. The Applicant has ensured this is included within the Outline PRow and Permissive Paths Management Plan [REP1-104], secured by Requirement 16 in Schedule 2 to the Draft DCO [REP4-004].
JF2-003	Socio-Economics, Tourism and Recreation	Equine Impacts	1.3. The Applicant has identified a number of equestrian receptors within the Environmental Statement. However, the evidence assembled during the Examination suggests that this identifies	The Applicant notes this comment and refers to the Equine Business Report [EN010168/EXAM/9.62] where the identified considerations are assessed.

Reference	Theme	Issue	Comments	Applicant's Response
			only part of the wider equestrian environment surrounding the Scheme and a failure to understand the impact that the Scheme would have on that environment. This submission considers whether the Environmental Statement adequately reflects: • The concentration of equestrian activity immediately surrounding the Scheme • The functional relationship between roads and Public Rights of Way used by equestrians • The distinction between commercial, professional and recreational equestrian activity • The seasonal nature of equestrian use; and • The implications these characteristics have for assessing receptor sensitivity.	
JF2-004	Socio-Economics,	Equine Impacts	1.4. The central proposition of this submission is therefore straightforward.	The Applicant refers to the Equine Business Report [EN010168/EXAM/9.62] where the

Reference	Theme	Issue	Comments	Applicant's Response
	Tourism and Recreation		The equestrian setting surrounding Lime Down is not characterised by isolated horse owners or occasional recreational riders spread around the area. Instead, the evidence demonstrates an established, extensive and highly interconnected equestrian environment supporting internationally recognised competition, commercial breeding, rural employment, recreation, education and heritage. The sensitivity of that receiving environment should therefore be considered in the context of its overall character rather than through individual receptor locations alone.	Applicant has provided a consolidated report of the both the likely effects on equine businesses in respect to equine health, and in respect to the employment and economic viability of equine businesses likely to be affected by the Scheme.
JF2-005	Socio-Economics, Tourism and Recreation	Equestrian Setting of the Scheme	2. The Equestrian Setting of the Scheme 2.1. The countryside surrounding the proposed Lime Down Solar Park has developed over many generations into one of the most distinctive equestrian areas in southern England. Within a relatively compact geographical area are internationally recognised	Re-routing or temporary closure of bridleways and byways may be advisable during peak construction times to minimise risk of impacts to equestrian users. These public rights of way are likely to be in transient use and therefore this reduces the extent to which this risk to equines in the area can be applied.

Reference	Theme	Issue	Comments	Applicant's Response
			competition riders, commercial thoroughbred and sport horse breeding enterprises, professional training yards, veterinary practices, nationally important equestrian institutions, riding schools, Pony Club activities, trail hunting, polo and a large community of recreational riders. Whilst each activity is different, they share one defining characteristic: they all depend upon the same network of rural roads, quiet lanes and PRowWs and tranquillity that surround the Scheme. This shared dependence creates an equestrian setting whose character is markedly different from that of a typical rural landscape.	The Applicant has provided mitigation measures to public rights of way users including, but not limited to, warning signage, provision of banksmen at locations HGVs may need to cross or use sections of PRowWs and closing or diverting PRowWs where construction activities would directly interact with PRowW use. As recommended, the Applicant is also able to provide signage for alternative routes for equestrian users of bridleways and byways, so that risks to equines and their riders and handlers can be minimised without also stopping pedestrians and cyclists from using these routes. The Applicant has ensured this is included within the Outline PRowW and Permissive Paths Management Plan [REP1-104], secured by Requirement 16 in Schedule 2 to the Draft DCO [REP4-004].

Reference	Theme	Issue	Comments	Applicant's Response
JF2-006	Socio-Economics, Tourism and Recreation	Equestrian Setting of the Scheme	2.2 <u>Figure 1</u> illustrates this clearly Figure 1 identifies equestrian properties (that is, any property with a recreational or business connection with equestrian activity) within and surrounding the Scheme and the network of roads and Public Rights of Way evidenced as being regularly used for exercising horses. Given time and resources, the focus has been on the area surrounding the solar sites themselves. Viewed together, these figures demonstrate that equestrian activity is not concentrated at one location, nor confined to designated bridleways. Instead, it forms an extensive and interconnected network extending across the whole of the receiving environment. The roads are not simply routes to reach bridleways. They form an integral part of the equestrian transport network, linking fragmented rights of way, connecting businesses with exercise routes and	The Applicant notes this comment and refers to the Equine Business Report [EN010168/EXAM/9.62] . The desk-based review was used to determine the location of private facilities using aerial or satellite photography (Google), and where advertising for equine businesses could be linked to a location, either through online mapping services, business websites, directories of equine-related businesses, or where suitable through Companies House. These methods were also used to understand the type of businesses being affected, supplementing information received through statutory consultation or found by the Applicant team on-location. The results of this identification process were set out in Table 2-10 in ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables

Reference	Theme	Issue	Comments	Applicant's Response
			enabling the day-to-day management of horses throughout the locality. This functional relationship is fundamental to understanding the nature of the equestrian setting as a receptor.	[APP-241]. This table also then set out the high-level consideration of whether or not significant effects from the Scheme were likely to be anticipated, and from this whether or not an equestrian facility should be assessed in greater detail. The Applicant considered this approach to be the most robust available at the statutory consultation stage based on the amount of information able to be gathered. The Applicant acknowledges that this method was not able to be entirely comprehensive, as there were equestrian facilities that were not able to be accurately identified due to minimal advertising, difficulties in distinguishing features on aerial photography, where websites did not display a location or address, or where registered addresses on Companies House were different from the location of the facility itself. The Applicant has sought to address additional equestrian facilities that it has

Reference	Theme	Issue	Comments	Applicant's Response
				been made aware of during the examination process and has, where relevant, provided a written response to demonstrate how the assessment of that facility would have been undertaken if included in ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241].
JF2-006	Socio-Economics, Tourism and Recreation	Equestrian Setting of the Scheme	3. Understanding the Equestrian Setting – Why it is Particularly Susceptible to Change 3.1 Introduction The significance of environmental effects depends not only upon the scale of change introduced by a development, but also upon the sensitivity of the receiving environment. Sensitivity is generally influenced by two principal considerations: • The susceptibility of a receptor to the type of change proposed; and • The value or importance of that receptor.	The Applicant had assessed the likely environmental effects on equestrian receptors in the context of their relationship to the Scheme, impacts from HGV movement, and impacts to the surrounding PRow network usable by equestrians. This is set out in ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068], which records no significant effect at West Park Farm, and the only determined significant adverse effect to Park Farm, Yatton Keynell during construction. The Equine Business Report [EXAM/9.62] has supplemented this by assessing the equine industry and supply chain in more detail, and

Reference	Theme	Issue	Comments	Applicant's Response
			Section 2 has demonstrated the extent and density of equine properties making up the equestrian setting surrounding the Scheme. Section 4 goes on to consider the value and importance of the equine setting surround the Scheme. The factors described below do not operate independently. Together they explain why equestrian receptors within this locality are more susceptible than would be suggested by the Applicant's surveys (which, in any event, were conducted at an inappropriate time and were for a short period).	identifying all relevant mitigation measures to equine businesses and equestrian users of the surrounding PRoW and highway network. This has been done in response to commentary to more holistically understand the context within equine businesses operate. This assessment has not found any new or additional significant effects to equine businesses, and determines that there are no significant effects to equine business anticipated at any phase of the Scheme.
JF2-007	Socio-Economics, Tourism and Recreation	Equestrian Network	3.2 The Equestrian Network Functions as a Connected System Unlike many recreational activities, equestrian use cannot be understood by considering individual routes or isolated facilities. Figure 1 demonstrates that horses are exercised across an extensive network of rural roads, lanes and Public Rights of Way. These routes are functionally	The Applicant notes this comment and refers to the Equine Business Report [EN010168/EXAM/9.62] where the interconnected network has been assessed as a commercial business, breeding enterprise and community use of PRoW's and bridleways. This builds on the assessment of the likely environmental effects in ES Volume 1, Chapter 16: Socio-

Reference	Theme	Issue	Comments	Applicant's Response
			connected. Public highways are routinely used to link fragmented bridleways, access quieter exercise routes, move horses safely between grazing land and yards, and undertake daily conditioning work. The road network therefore forms part of the equestrian infrastructure rather than simply providing access to it. A restriction, reduction in amenity or increase in perceived risk affecting one part of this network has the potential to influence use of a much wider area. This interconnectedness is a defining characteristic of the equestrian setting and has not been fully reflected within the Applicant's assessment.	Economics, Tourism and Recreation [APP-068] which assesses the impact on equestrian receptors in the context of their relationship to the Scheme, impacts from HGV movement, and impacts to the surrounding PRoW network usable by equestrians. Section 4 [EXAM/9.62] assesses the potential impacts on business viability as a whole covering both construction and operational concerns. Re-routing or temporary closure of bridleways and byways may be required during peak construction times to minimise risk of impacts to equestrian users. These public rights of way are likely to be in transient use and therefore this reduces the extent to which this risk to horses in the area will arise. Bridleways, and other routes used by equestrians likely to be affected by the Scheme during construction are summarised in ES Volume 1, Chapter

Reference	Theme	Issue	Comments	Applicant's Response
				16: Socio-Economics, Tourism and Recreation [APP-068], with the assessment of individual receptors set out in Section 3.4 of ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]. A total of 31 bridleways, byways, and unsurfaced roads were included within the assessment. The Applicant has provided mitigation measures to public rights of way users including, but not limited to, warning signage, provision of banksmen at locations HGVs may need to cross or use sections of PRowWs and closing or diverting PRowWs where construction activities would directly interact with PRowW use. As recommended, the Applicant is also able to provide signage for alternative routes for equestrian users of bridleways and byways, so that risks to equines and their riders and handlers can be minimised without also stopping pedestrians and cyclists from using these routes.

Reference	Theme	Issue	Comments	Applicant's Response
				The Applicant has ensured this is included within the Outline PRow and Permissive Paths Management Plan [REP1-104] , secured by Requirement 16 in Schedule 2 to the Draft DCO [REP4-004] .
JF2-008	Socio-Economics, Tourism and Recreation	Equine Impacts	3.3 Daily Operational Dependence Unlike many recreational activities that can be postponed or relocated, the management of horses is a daily requirement. Commercial breeding enterprises, competition yards, liveries and private horse owners all require regular exercise, turnout, veterinary access and routine movement of horses throughout the year. For many businesses these movements are fundamental to normal operation rather than discretionary. Construction activity extending over a prolonged period therefore has the potential to influence day-to-day management practices in a way that	Response to be completed following equine business study draft The Applicant notes this comment and refers to the Equine Business Report [EN010168/EXAM/9.62] which explicitly acknowledges that equestrian facilities operate 365 days per year and that horses require daily care, exercise, and monitoring regardless of the season. and notes that for commercial enterprises like stud farms and breeding operations, activities such as foaling, turnout, and routine movement are fundamental to integrated business operations. The report sets out a detailed evaluation of the year-round daily operational dependencies and environmental sensitivities of the local equestrian sector, concluding that secured communication practice and a

Reference	Theme	Issue	Comments	Applicant's Response
			differs materially from occasional recreational use. Such construction work also has the potential to produce noise and vibration, including through traffic movements but also the building out of the scheme (e.g. through piling) which will cause stress and flight response in horses. Similarly in the operational phase noise and also glint and glare has the potential to produce the same response in horses. This is again a material harm and one which is hard to avoid. This is particularly relevant within an area where commercial equestrian activity forms an important part of the rural economy.	mitigation framework, the Scheme will not give rise to significant adverse effects on equine welfare, business viability, or the sector's vital contribution to the rural economy.
JF2-009	Socio-Economics, Tourism and Recreation	Equine Impacts	3.4 Public Roads are an Essential Part of Horse Management The Applicant's assessment places considerable emphasis on Public Rights of Way.	The Applicant notes this comment and refers to the Equine Business Report [EN010168/EXAM/9.62] where the interconnected network has been assessed as a commercial business, breeding enterprise and community use of PRow's and bridleways.

Reference	Theme	Issue	Comments	Applicant's Response
			Whilst these routes are important, they represent only one component of the local equestrian network. The mapped evidence assembled during the Examination demonstrates that local roads and quiet rural lanes are used extensively by equestrians because many bridleways are fragmented and do not provide continuous off-road access. In practice, horses frequently travel along public roads in order to reach safer off-road riding, gallops, woodland tracks or circular exercise routes. Consequently, any assessment that focuses primarily upon designated bridleways risks underestimating the extent of equestrian activity potentially affected by changes to the surrounding highway network. Evidence gathered confirms that this road use is not simply a consequence of fragmented rights of way. Respondents consistently explained that roadwork forms an essential part of horse management, being used to develop	Section 4 assesses the potential impacts on business viability as a whole covering both construction and operational concerns. Re-routing or temporary closure of bridleways and byways may be required during peak construction times to minimise risk of impacts to equestrian users. These public rights of way are likely to be in transient use and therefore this reduces the extent to which this risk to horses in the area will arise. Bridleways, and other routes used by equestrians likely to be affected by the Scheme during construction are summarised in ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068], with the assessment of individual receptors set out in Section 3.4 of ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]. A total of 31 bridleways, byways, and unsurfaced roads were included within the assessment.

Reference	Theme	Issue	Comments	Applicant's Response
			fitness, strengthen tendons and ligaments, improve bone density, rehabilitate injured horses and safely introduce young horses to traffic before they undertake more demanding work. These activities cannot readily be replicated within arenas or enclosed fields.	The Applicant has provided mitigation measures to public rights of way users including, but not limited to, warning signage, provision of banksmen at locations HGVs may need to cross or use sections of PRoWs and closing or diverting PRoWs where construction activities would directly interact with PRoW use. As recommended, the Applicant is also able to provide signage for alternative routes for equestrian users of bridleways and byways, so that risks to equines and their riders and handlers can be minimised without also stopping pedestrians and cyclists from using these routes. The Applicant has ensured this is included within the Outline PRoW and Permissive Paths Management Plan [REP1-104], secured by Requirement 16 in Schedule 2 to the Draft DCO [REP4-004].
JF2-010	Socio-Economics,	Equine Impacts	3.5 Commercial Equestrian Activity Cannot Easily Relocate	The Applicant notes this comment and refers to the Equine Business Report [EN010168/EXAM/9.62] where the

Reference	Theme	Issue	Comments	Applicant's Response
	Tourism and Recreation		The Applicant's assessment largely considers equestrian users as a single receptor group. However, the evidence demonstrates that the receiving environment supports a broad range of commercial enterprises including thoroughbred breeding operations, competition yards, liverys, vets and associated equestrian services. These businesses have developed within this locality because of its existing characteristics, including the availability of quiet rural roads, interconnected riding routes, experienced equestrian professionals and supporting infrastructure.	interconnected network has been assessed as a commercial business, breeding enterprise and community use of PRow's and bridleways.
JF2-011	Socio-Economics, Tourism and Recreation	Equine Businesses	Unlike occasional recreational activity, commercial equestrian businesses cannot simply relocate their daily operations or suspend exercise routines during extended periods of construction. Their continued success depends upon maintaining safe, predictable access to the surrounding network.	The Applicant notes this comment and refers to the Equine Business Report [EN010168/EXAM/9.62] where the interconnected network has been assessed as a commercial business, breeding enterprise and community use of PRow's and bridleways.

Reference	Theme	Issue	Comments	Applicant's Response
			Several commercial and competition yards have responded that relocating horses elsewhere for daily exercise is not a realistic operational alternative. Doing so would require additional staffing, horse transport and time, fundamentally altering established business practices and increasing operating costs.	Section 4 – Construction: Impacts of Business Viability assess the impacts of equine business practices. As part of its mitigation measures, as set out in full at Section 5 [EXAM/9.62] the Applicant has committed to engaging with commercial equine businesses through the Stakeholder Communication Plan, and the provision of a dedicated equine specialist within the Community Liaison Group. Through these channels, the Applicant can give more detailed information of the Scheme's construction works to inform equine businesses of potential disruption.
JF2-012	Socio-Economics, Tourism and Recreation	Equine Impacts	3.6 Horse Behaviour and Rider Safety Horses are large prey animals whose behavioural responses differ fundamentally from those of pedestrians or cyclists. Although many horses become accustomed to normal rural traffic, where drivers are generally familiar with horses and at pains to slow down or	To minimise threats to horses as a result of interactions with HGVs on construction routes, effects should be made to ensure driver behaviour and physical space provisions are suitable to ensure horse and rider safety is protected. Literature has shown that the most important factors when horses and traffic share the same roads safely are the speed of the traffic and the distance

Reference	Theme	Issue	Comments	Applicant's Response
			stop and to give them a wide birth. Sudden changes in their surroundings, unfamiliar construction activity, abnormal loads, increased HGV movements, temporary traffic management and associated noise can alter both horse and rider behaviour and increase risks to horses and riders. This is recognised within national equestrian guidance and explains why riders often seek quiet roads and predictable traffic conditions when exercising horses. The issue is therefore not simply one of physical access. It is also one of confidence, safety and the continued suitability of established exercise routes.	that it passes away from the horse (which again is due to the flight zone of the horse) ¹. The Highway Code, Rule 215² and BHS guidance³ details that vehicles should pass horses at a maximum of 10 mph, allowing at least 2 metres of space between vehicles and the horse and rider. Any signals by a horse rider to other road users, such as a signal to slow down, or stop, should be heeded to reduce risk to all users. Whilst this is part of the Highway Code, HGV drivers contracted for the Scheme should be given specific additional training to ensure they understand the need to reduce speeds on routes likely to be used by equestrians, and how to safety

¹ Pollard, D.; Furtado, T. (2021). Public Roads as Places of Interspecies Conflict: A Study of Horse-Human Interactions on UK Roads and Impacts on Equine Exercise. *Animals*, 11 (1072). Available at <https://doi.org/10.3390/ani11041072>

² Department for Transport (2015). The Highway Code: Road users requiring extra care (204 to 225). Available at <https://www.gov.uk/guidance/the-highway-code/road-users-requiring-extra-care-204-to-225>

³ British Horse Society (2024). Advice for motorists. Available at <https://www.bhs.org.uk/go-riding-and-learn/riding-out-hacking/riding-on-roads/advice-for-motorists/>

Reference	Theme	Issue	Comments	Applicant's Response
				react and respond to the occurrence of horses and riders on the road. The Applicant has ensured this is included within the Outline CTMP [REP4-057], secured by Requirement 15 in Schedule 2 to the Draft DCO [REP4-004].
JF2-013	Socio-Economics, Tourism and Recreation	Equine Impacts	Respondents also describe the importance of gradually introducing young or previously nervous horses to normal rural traffic in controlled conditions. They expressed concern that prolonged construction traffic, abnormal loads and frequent HGV movements would fundamentally alter those training environments and reduce opportunities for safe rehabilitation and confidence-building.	See response above.
JF2-014	Socio-Economics, Tourism and Recreation	Equine Businesses – Duration of Construction	3.7 The Duration of Construction is Material The Proposed Development would involve a prolonged construction programme extending over approximately two years.	Paragraph 16.10.38 of ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068] sets out the principal matters taken into consideration when assessing likely impacts to these facilities during construction:

Reference	Theme	Issue	Comments	Applicant's Response
			This is not comparable to temporary highway works or short-term disruption. For commercial businesses, breeding enterprises and regular riders, the effects would coincide with multiple breeding seasons, competition seasons, trail hunting seasons and the routine daily management of horses. The duration of construction is therefore an important consideration when assessing susceptibility.	"The Scheme's construction is likely to impact on equestrian facilities by way of views impacting the desirability of the facilities for users, the potential for disruption and noise from construction to facility users and horses in paddocks, and the potential for HGV and construction traffic on local roads to impact on recreational use and access to the PRoW network for hacking."
JF2-015	Socio-Economics, Tourism and Recreation	Equestrian Setting	3.8 Cumulative Effects Across an Interconnected Setting The sensitivity of the receiving environment does not arise solely from the presence of individual equestrian properties. It arises because numerous businesses, professional riders, recreational users and equestrian organisations operate within the same interconnected landscape and depend upon many of the same roads and Public Rights of Way.	The Applicant notes this comment and refers to the Equine Business Report [EN010168/EXAM/9.62] where the interconnected network has been assessed as a commercial business, breeding enterprise and community use of PRoW's and bridleways. This builds on the assessment of the likely environmental effects in ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068] which assesses the impact on equestrian receptors in the context of their relationship to the Scheme,

Reference	Theme	Issue	Comments	Applicant's Response
			Consequently, relatively modest changes experienced by individual users have the potential to become more significant when considered collectively across the wider equestrian setting. This cumulative characteristic distinguishes the Lime Down equestrian setting from one where equestrian activity is isolated or incidental.	impacts from HGV movement, and impacts to the surrounding PRow network usable by equestrians. This assessment had considered the likely effect to all users of PRow's and the local road network for recreation, and so was assessed in an understanding that users of those routes could come from a range of equestrian facilities and businesses.
JF2-016	Socio-Economics, Tourism and Recreation	Equestrian Setting	4. Evidence Supporting the Characterisation of the Equestrian Setting 4.1 Introduction The purpose of this section is not to catalogue individual equestrian facilities or achievements, but rather to emphasise the importance of equestrian activity in the area. Taken collectively, these examples demonstrate that the Scheme lies within an established equestrian setting characterised by commercial breeding, elite competition, professional training,	The Applicant notes this comment and refers to the Equine Business Report [EN010168/EXAM/9.62] where the interconnected network has been assessed as a commercial business, breeding enterprise and community use of PRow's and bridleways. Annex B of the study reviews Equine Industry Case Studies to support the assessment.

Reference	Theme	Issue	Comments	Applicant's Response
			recreation, heritage and associated rural businesses. No single example is relied upon in isolation. Instead, together they illustrate the exceptional concentration and diversity of equestrian activity immediately surrounding the Proposed Development.	
JF2-017	Socio-Economics, Tourism and Recreation	Equestrian Sport	4.2 Elite Competition and Professional Equestrian Sport The local area supports an exceptional concentration of professional equestrian activity. Current residents include Olympic medallists, international event riders, Grand Prix dressage riders, international trainers and leading polo players whose daily professional activities rely upon exercising horses within the surrounding road and Public Rights of Way network. Examples include Laura Tomlinson MBE, Kitty King, Alicia Hawker and Sarah Stewart BHSI. The significance of these individuals is not their personal achievements, but	The Applicant notes this comment and refers to the Equine Business Report [EN010168/EXAM/9.62] where Section 3.2 assesses the UK Equine Industry, including the professional equestrian activity within the area.

Reference	Theme	Issue	Comments	Applicant's Response
			what their presence demonstrates about the character of the locality. Professional riders choose to establish themselves where suitable infrastructure, experienced support services and safe exercising routes exist. Their continued presence reflects the longestablished suitability of this area for high-level equestrian activity.	
JF2-018	Socio-Economics, Tourism and Recreation	Equine Businesses	4.3 Commercial Breeding and the Bloodstock Industry The area also supports an established concentration of commercial breeding enterprises forming part of the United Kingdom's internationally recognised bloodstock industry. These include internationally trading thoroughbred studs, sport horse breeding establishments, youngstock producers and specialist sales preparation yards. Examples include West Park Farm, Ladyswood Stud, Estcourt Park Stud (Juddmonte Farms), New Prior Stud, West Kington Stud,	The Applicant notes this comment and refers to the Equine Business Report [EN010168/EXAM/9.62] where Section 3 assesses Commercial Breeding and the Bloodstock Industry.

Reference	Theme	Issue	Comments	Applicant's Response
			Kington Langley Stud and Park Wood Stud. Unlike recreational horse ownership, these are commercial businesses whose operation depends upon the routine movement, safety and management of valuable horses throughout the year. Broodmares, foals, yearlings and young competition horses require regular handling, exercise and veterinary attention using the surrounding network of roads and tracks. These businesses demonstrate both the economic importance of the equestrian sector and its dependence upon the surrounding rural infrastructure.	
JF2-019	Socio-Economics, Tourism and Recreation	Historic Equestrian Institutions	4.4 Historic Equestrian Institutions The wider setting has been shaped by equestrian activity over many centuries. The Duke of Beaufort's Hunt (Trail hunting) The Duke of Beaufort's Hunt is one of the oldest hunting institutions in the	The Applicant recognises that the Duke of Beaufort's Hunt operates within land in the proximity of the Scheme. This is acknowledged in paragraph 3.3.3 of the Equine Business Report [EN010168/EXAM/9.62]. Although not assessed explicitly, the Applicant does not consider that the

Reference	Theme	Issue	Comments	Applicant's Response
			world. It has operated across this area since the seventeenth century and remains one of Britain's most distinguished hunts. Its country extends across approximately 760 square miles, encompassing the entirety of the Proposed Development and surrounding villages. During the trail hunting season, substantial numbers of mounted riders (200+) use the same roads, tracks and rights of way identified within Fig. 1 and 2. Recent meets at East Dunley Farm, Lordswood Farm, Lordswood House, Foxley Manor, Badminton and Easton Grey House illustrate that organised equestrian activity remains an established part of the local environment. This level of activity is inherently seasonal and could not reasonably be expected to be represented by a single week of survey work undertaken in late May.	Scheme would significantly affect organised equestrian activity. Event organisers would be provided information of construction activities through the Stakeholder Engagement Plan, as secured by the Outline Construction Environmental Management Plan [REP4-049] by Requirement 13 of Schedule 2 to the Draft DCO [REP4-004]. Specific events may also be accommodated in the details of the Outline Construction Traffic Management Plan [REP4-057] by Requirement 15 of Schedule 2 to the Draft DCO [REP4-004], which states: <i>"Any further measures required during major events ... or at other local events will be included in the Final CTMPs following consultation with the Local Highway Authority."</i>

Reference	Theme	Issue	Comments	Applicant's Response
JF2-020	Socio-Economics, Tourism and Recreation	Badminton Horse Trials	Badminton Horse Trials Approximately 4km west of the Scheme lies Badminton Horse Trials, one of only a small number of five-star eventing competitions held worldwide. Each year Badminton attracts competitors and spectators (200,000+) from across the world and generates exceptionally high volumes of horse transport, equestrian traffic and associated rural activity throughout the surrounding road network. The relevance of Badminton within this submission is not that the event itself would necessarily experience direct effects from Lime Down. Rather, Badminton demonstrates the established equestrian character of the surrounding area. The international reputation of the event has contributed to the development of a unique concentration of riders, trainers, breeders, support services and equestrian businesses throughout the locality over many decades.	The Applicant notes this comment and refers to the Equine Business Report [EN010168/EXAM/9.62] where Section 3.3.3 includes Badminton Horse Trials as a high-profile venue with major significance within the area. This venue has been included within the assessment and therefore mitigation measures. The Badminton Horse Trials was also specifically assessed in ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241] due to its international importance as a sporting event. No significant adverse effects were found at any phase of the Scheme.

Reference	Theme	Issue	Comments	Applicant's Response
			It is one of the defining characteristics of the equestrian setting of this area.	
JF2-021	Socio-Economics, Tourism and Recreation	Polo	4.5 Polo Polo in this area has documented roots to 1872, when Colonel Frank Henry established the first polo club in Norton (directly within the Lime Down scheme) after returning from the regiment credited with introducing polo to England. Its founding members were drawn from the Beaufort Hunt. The modern Beaufort Polo Club is now based at Westonbirt (approx. 4 miles from Lime Down sites) is now run by Luke and Mark Tomlinson, both England polo captains and HRH King Charles III has served as patron. Together with associated training establishments and players located within and immediately surrounding the Scheme, polo contributes a further dimension to the equestrian setting. Unlike many other equestrian disciplines, polo requires strings of ponies to be exercised daily. These	The Beaufort Polo Club was not assessed specifically in ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241] or in the Equine Business Report [EN010168/EXAM/9.62] as it is located more than 5 km from the Scheme. The Applicant refers to the Equine Business Report [EN010168/EXAM/9.62] where Section 3 assesses Commercial Breeding and the Bloodstock Industry, and as such, the impact to any facilities where horses used for polo may be located.

Reference	Theme	Issue	Comments	Applicant's Response
			movements rely upon the same interconnected network of quiet roads and rural lanes used by other equestrian businesses. This further illustrates that the surrounding highway network supports a wide range of equestrian activity extending well beyond recreational riding.	
JF2-022	Socio-Economics, Tourism and Recreation	Equestrian Settiing	4.6 Community Participation The equestrian setting is equally important at community level. The area supports riding schools, Pony Club activities, unaffiliated competitions, trail hunting, pleasure riding, endurance riding and a large number of private horse owners. Facilities such as the paddocks on Avil's Lane (The Pony Project charity) provide opportunities for children and young people to participate in equestrian sport immediately adjacent to the Scheme. This demonstrates that the equestrian setting supports participation at every	The Applicant notes this comment and refers to the Equine Business Report [EN010168/EXAM/9.62] which assessed all commercial equine businesses within the 5 km Study Area. Identified equestrian receptors assessed specifically in ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241] included riding schools, unaffiliated events and racing venues, recreational riding centres, and private facilities that were likely to be affected by the Scheme. No significant effects to equestrian receptors were assessed as likely to occur, with the exception of Park Farm,

Reference	Theme	Issue	Comments	Applicant's Response
			level, from first time riders through to Olympic competition. Its value therefore extends beyond commercial activity alone.	Yatton Keynell during the construction phase due to the direct impact of Cable Route Corridor construction works affecting the business' land.
JF2-023	Socio-Economics, Tourism and Recreation	Equine Businesses	4.7 A Supporting Rural Economy The equestrian setting also supports a wider network of rural businesses whose success depends upon the continued presence of equestrian activity. These include specialist veterinary practices, farriers, feed merchants, transport operators, saddlers, physiotherapists, instructors, fencing contractors and other equestrian service providers. Many of these businesses have developed specifically because of the concentration of horses and equestrian enterprises within the locality. Many horses are kept in livery yards to be able to hack around the rural lanes and tracks safely. The loss of any horse to a yard will have a direct economic	The Applicant notes this comment and refers to the Equine Business Report [EN010168/EXAM/9.62] . Potential effects on employment and the wider supply chain would arise indirectly, through any impact of the Scheme on the viability or trading performance of local equestrian businesses. In practice, this means that job losses or reduced expenditure within the supply chain would only be likely to occur if equestrian facilities experienced a sustained reduction in income, activity levels or client demand of sufficient scale to require a contraction in operations. As set out in the report, the potential construction and operational effects

Reference	Theme	Issue	Comments	Applicant's Response
			impact on the yard, it's staff and also on the farrier, feed merchant and others who provide services to that yard. Accordingly, the equestrian setting should not be viewed solely as a recreational resource, but as an established component of the local rural economy.	identified in relation to equestrian businesses are generally considered to be temporary, localised and manageable, particularly with the proposed mitigation in place. On this basis, there is no strong evidence to suggest that the Scheme would result in widespread business failure, closure, or material long-term contraction of commercial equestrian enterprises, particularly given the strengths of the wider local equestrian market.
JF2-024	Socio-Economics, Tourism and Recreation	Equestrian Setting	4.8 Summary The evidence presented above demonstrates a receiving environment that is unusual both in its concentration and diversity of equestrian activity. Professional competition, commercial breeding, recreation, heritage, education and rural business are not separate receptors operating independently. They are interconnected components of a single equestrian setting which has evolved over many generations and	The Applicant notes this comment and refers to the Equine Business Report [EN010168/EXAM/9.62] where these aspects have been assessed in full.

Reference	Theme	Issue	Comments	Applicant's Response
			depends upon the same network of roads, lanes and Public Rights of Way. This wider context is fundamental to understanding the importance, and therefore the sensitivity of equestrian receptors surrounding the Scheme.	
JF2-025	Socio-Economics, Tourism and Recreation	Evidence from Local Equestrian Community	4.9 Evidence from the local equestrian community During preparation of this submission additional information was obtained from commercial equestrian businesses, competition riders and recreational horse owners across the scheme area. Although representing different disciplines, the responses demonstrated remarkable consistency. They confirmed that horses are exercised routinely throughout the year using an interconnected network of roads and PRoWs, that roadwork forms an essential component of horse management and that the principal concerns relate to safety, loss of established exercise routes and the	The Applicant acknowledges the evidence from the local equestrian community that horses require routine, year-round exercise on an interconnected network of roads and PRoWs where roadwork is an essential component of horse management. This acknowledgement has directly informed the Applicant's approach to addressing the community's core concerns regarding rider safety, the protection of established exercise routes, and the mitigation of operational consequences resulting from prolonged construction activity.

Reference	Theme	Issue	Comments	Applicant's Response
			operational consequences of prolonged construction activity.	
JF2-026	Socio-Economics, Tourism and Recreation	Comparison with the Applicant's Assessment	5. Comparison with the Applicant's Assessment 5.1 Introduction The previous sections have described the character of the equestrian setting surrounding the Scheme and the factors that contribute to its sensitivity. This section considers that evidence alongside the methodology adopted within the Applicant's Environmental Statement. The intention is not to repeat matters already addressed elsewhere during the Examination, but to assist the Examining Authority in considering whether the equestrian receiving environment has been fully characterised before the significance of likely effects is determined.	The Applicant acknowledges that this comparative analysis was developed to ensure the equestrian environment is comprehensively characterised by evaluating local operational dependencies alongside the methodology previously established in the Environmental Statement. By integrating direct evidence and representations made in Examination from equestrian businesses and specialist veterinary advice, the Applicant maintains it has provided a robust and detailed baseline that accurately reflects local equine economy
JF2-027	Socio-Economics,	Equine Assessment	5.2 The Assessment Focuses on Individual Facilities Rather than the Receiving Environment	The Applicant is confident that the assessment of equine facilities, PRoWs, and the receiving environment is fully

Reference	Theme	Issue	Comments	Applicant's Response
	Tourism and Recreation		The Applicant's assessment identifies a number of equestrian facilities and recreational receptors within the study area and cable corridor and considers their likely interaction with the Proposed Development. That approach is understandable when assessing individual visitor attractions or recreational facilities. However, the evidence assembled during the Examination suggests that equestrian activity within the Lime Down area functions differently. Rather than comprising a series of independent destinations, the receiving environment is characterised by an extensive network of commercial businesses, professional riders, recreational users and supporting services that operate collectively across the wider countryside all adding to the economy of the immediate area. Fig 1 and 2 demonstrate this distinction. The principal receptor is therefore not simply an individual riding establishment or a particular bridleway, but the wider	captured in the assessment in ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068] and the supporting ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]. The Equine Business Report [EN010168/EXAM/9.62] has been provided to consider the wider interconnected economy of the equine industry, and how it relates to supporting industries in its supply chain. This assessment has not found any new or additional significant effects to equine businesses, and determines that there are no significant effects to equine business anticipated at any phase of the Scheme.

Reference	Theme	Issue	Comments	Applicant's Response
			equestrian setting that supports them all. This distinction is important because receptor sensitivity depends upon the character of the receiving environment as a whole rather than individual facilities considered in isolation.	
JF2-028	Socio-Economics, Tourism and Recreation	Functional Riding Network	5.3 The Functional Riding Network The Applicant's assessment recognises Public Rights of Way that are likely to experience direct effects from the Scheme. The evidence gathered during the Examination suggests that this captures only part of the network routinely used by equestrians. Figure 1 demonstrates that roads and quiet rural lanes are used extensively to connect fragmented bridleways, reach off-road exercise routes and undertake routine horse management. For many equestrian users, these roads are not an alternative to PRoW they are	The Applicant notes this comment and refers to the Equine Business Report [EN010168/EXAM/9.62] . Figure 2 highlights there to be around 16 livery yards and 11 stud farm operations within 5km of the Scheme that have been assessed. The study also assesses the PRoW network utilised and secures mitigation within the Outline PRoW and Permissive Paths Management Plan [REP1-104].

Reference	Theme	Issue	Comments	Applicant's Response
			an integral component of the riding network. Consequently, changes affecting the local highway network have the potential to influence equestrian activity more widely than would be indicated by considering designated bridleways alone.	
JF2-029	Socio-Economics,, Tourism and Recreation	Equestrian Receptors	5.4 Distinguishing Different Types of Equestrian Receptor The evidence assembled during the Examination also suggests that equestrian activity within the locality encompasses a broad spectrum of users with different operational requirements. These include: • Internationally recognised competition riders • Commercial breeding enterprises • Professional training establishments	The Applicant notes this comment and refers to the Equine Business Report [EN010168/EXAM/9.62]. Annex A lists the type of facilities identified within 5 km of the Scheme that have been assessed, and the supply chain businesses identified by the Applicant team or through questionnaire responses within the wider 20 km Study Area.

Reference	Theme	Issue	Comments	Applicant's Response
			• Veterinary and associated equestrian businesses • Trail hunting and polo activities • Riding schools and charitable organisations • Recreational riders – whether keeping their horse at home or at livery Whilst all involve horses, their susceptibility to environmental change is not necessarily the same. Commercial breeding enterprises, for example, are dependent upon the routine movement of mares, foals and youngstock throughout the year and responsible for staff safety. Professional competition yards require regular exercise programmes and safe access to surrounding routes. Recreational riders may have greater flexibility in how and when they ride. The evidence therefore suggests that considering these varied activities collectively as a single receptor group	

Reference	Theme	Issue	Comments	Applicant's Response
			may not fully reflect their differing sensitivities.	
JF2-030	Socio-Economics, Tourism and Recreation Transport and Access	NMU Surveys	5.5 Survey Methodology The Applicant's Non-Motorised User surveys provide a snapshot of activity during the survey period. However, the evidence assembled during the Examination indicates that a single week of survey work during an unrepresentative week does not properly represent the complexity of equestrian activity within this locality. Equestrian use varies considerably according to: • Season • Weather conditions • Trail hunting calendars • Breeding activities • Competition schedules • School holidays • Daylight hours.	The Applicant has undertaken updated NMU surveys following ISH 3. The Applicant intends to submit the results at Deadline 6.

Reference	Theme	Issue	Comments	Applicant's Response
			In addition, horses are routinely exercised at different times of day depending upon weather conditions and management practices. The survey period also coincided with an Amber Heat Health Alert and half term, during which many horse owners altered normal exercise routines in the interests of horse welfare. The survey results should therefore be interpreted as a snapshot of activity during one particular period rather than a comprehensive representation of annual equestrian use.	
JF2-031	Socio-Economics, Tourism and Recreation	Equine Businesses	5.6 Commercial Activity The evidence presented within this submission indicates that the equestrian setting supports a substantial rural economy extending beyond the individual equestrian facilities identified within the Environmental Statement. Commercial breeding studs, veterinary practices, farriers, transport providers, feed suppliers and numerous specialist	The Applicant notes this comment and refers to the Equine Business Report [EN010168/EXAM/9.62] where these aspects have been assessed in full.

Reference	Theme	Issue	Comments	Applicant's Response
			services collectively contribute to the economic character of the locality. The purpose of this observation is not to suggest that every individual business should necessarily have been assessed separately as a receptor though the economic impact to each business does not appear to have been assessed, it is to demonstrate that the concentration of commercial equestrian activity forms part of the baseline character of the receiving environment and is relevant when considering receptor sensitivity.	
JF2-032	Socio-Economics, Tourism and Recreation	Equestrian Setting	5.7 Overall Characterisation of the Equine Setting as the Receiving Environment Taken individually, each of the matters described above might reasonably be regarded as a limitation inherent within any broad environmental assessment. Taken collectively, however, they suggest that the equestrian setting surrounding the Scheme is more extensive, more interconnected and more operationally dependent upon the	The Applicant notes this comment and refers to the Equine Business Report [EN010168/EXAM/9.62] where these aspects have been assessed in full.

Reference	Theme	Issue	Comments	Applicant's Response								
			surrounding road and rights of way network than is apparent from the Environmental Statement alone. The evidence assembled during the Examination therefore indicates that the equestrian receiving environment may not have been fully characterised before judgements regarding receptor sensitivity were reached. <table><tr><td>Applicant's assessment</td><td>Evidence assembled during examination</td></tr><tr><td>Individual equestrian facilities</td><td>Individual equestrian facilities</td></tr><tr><td>PRoWs</td><td>PRoWs AND local roads</td></tr><tr><td>Short duration survey's</td><td>Year-round operational use</td></tr></table>	Applicant's assessment	Evidence assembled during examination	Individual equestrian facilities	Individual equestrian facilities	PRoWs	PRoWs AND local roads	Short duration survey's	Year-round operational use	
Applicant's assessment	Evidence assembled during examination											
Individual equestrian facilities	Individual equestrian facilities											
PRoWs	PRoWs AND local roads											
Short duration survey's	Year-round operational use											

Reference	Theme	Issue	Comments			Applicant's Response
			General equestrian receptors	Commercial, professional and recreational receptor groups		
			Individual locations	Continuous network across the scheme		
JF2-033	Socio-Economics, Tourism and Recreation	Equine Impact	Common Themes from responses:			The Applicant notes this comment and refers to the Equine Business Report [EN010168/EXAM/9.62] where these aspects have been assessed in full.
			Theme	Evidence		
			Daily Riding	Most exercise horses 4-7 days per week		
			Roads	Essential for roadwork and linking fragmented bridleways		

Reference	Theme	Issue	Comments			Applicant's Response
			Commercial	Businesses cannot simply relocate exercise and ensure staff safety		
			Young horses	Roads used to introduce horses safely to traffic		
			Rehabilitation	Roads important for recovery programmes		
			Construction	HGVs and traffic expected to reduce safety and confidence		
JF2-034	Socio-Economics,	Implications for the Examination	6. Implications for the Examination 6.1. The purpose of this submission is not to suggest that equestrian activity			The Applicant notes this comment and refers to the Equine Business Report

Reference	Theme	Issue	Comments	Applicant's Response
	Tourism and Recreation		should prevent development in principle but it seeks to assist the Examining Authority by demonstrating that the equestrian receiving environment surrounding the Scheme possesses characteristics which appear more extensive, interconnected and operationally dependent upon the surrounding road and Public Rights of Way network than is reflected within the Environmental Statement. The significance of any environmental effect depends not only upon the scale of change introduced by a development, but also upon the sensitivity of the receptor affected. Accordingly, an accurate understanding of the receiving environment forms an essential foundation for any subsequent assessment of likely significant effects.	[EN010168/EXAM/9.62] where these aspects have been assessed in full.
JF2-035	Socio-Economics, Tourism and Recreation	Equestrian Setting	6.2. The evidence assembled during the Examination suggests that the equestrian setting surrounding Lime Down comprises considerably more	The Applicant notes this comment and refers to the Equine Business Report [EN010168/EXAM/9.62] where these aspects have been assessed in full.

Reference	Theme	Issue	Comments	Applicant's Response
			than a collection of individual equestrian facilities. It functions as an interconnected environment supporting: • Commercial breeding enterprises • Professional competition yards • Internationally recognised riders • Veterinary and equestrian service providers • Trail hunting, polo and recreational riding • Education and youth participation • A substantial rural equestrian economy These activities depend upon many of the same roads, lanes, PRow's and general tranquility. Understanding this interconnected character is fundamental when considering sensitivity to environmental change.	

Reference	Theme	Issue	Comments	Applicant's Response
JF2-036	Socio-Economics, Tourism and Recreation	Equine Assessment	6.3. This submission does not seek to substitute one professional assessment for another. Nor does it seek to quantify impacts that have not yet occurred. Instead, it provides additional contextual evidence assembled during the Examination which may assist the Examining Authority when considering whether the Environmental Statement has fully characterised the equestrian receiving environment against which impacts have been assessed. It is respectfully suggested that this wider and more concentrated equine context should be considered alongside the Applicant's assessment when determining the sensitivity of equestrian receptors.	The Applicant notes this comment and refers to the Equine Business Report [EN010168/EXAM/9.62] where these aspects have been assessed in full.
JF2-037	Socio-Economics, Tourism and Recreation	Equine Assessment	6.4. Should the Examining Authority conclude that the equestrian receiving environment is more extensive, more concentrated and/or more sensitive than originally characterised, this may be relevant when considering:	The Applicant notes this comment and refers to the Equine Business Report [EN010168/EXAM/9.62] where these aspects have been assessed in full.

Reference	Theme	Issue	Comments	Applicant's Response
			• The significance attributed to environmental effects • The adequacy of proposed mitigation • The assessment of cumulative effect • The construction and traffic management plans • Whether the Environmental Statement provides a sufficiently complete understanding of the receiving environment.	
JF2-038	Socio-Economics, Tourism and Recreation	Conclusion	7. Conclusions 7.1. The evidence presented within this submission demonstrates that the countryside surrounding the proposed Lime Down Solar is an established and highly interconnected equestrian setting. That setting supports elite competition, commercial breeding, professional training, rural businesses, recreation, education and heritage, all of which rely upon the same network of local roads,	The Applicant notes this comment.

Reference	Theme	Issue	Comments	Applicant's Response
			rural lanes, PRoWs and the general tranquility of the area. It is this interconnected character, rather than any individual equestrian facility, which defines the receiving environment.	
JF2-039	Socio-Economics, Tourism and Recreation	Equestrian Setting	7.2 The mapping undertaken during the Examination demonstrates that equestrian activity extends throughout the Scheme and its surroundings. Figures 1 illustrates both the concentration of equestrian properties and the extensive network of roads and Public Rights of Way routinely used for horse management and exercise. Taken together, they provide a picture of the receiving environment that differs materially from one based solely upon individual facilities or short-duration observations.	The Applicant notes this comment and refers to the Equine Business Report [EN010168/EXAM/9.62] where these aspects have been assessed in full.
JF2-040	Socio-Economics, Tourism and Recreation	Equestrian Setting	7.3 The evidence assembled during the Examination also demonstrates that commercial, professional and	The Applicant notes this comment and refers to the Equine Business Report [EN010168/EXAM/9.62] where these aspects have been assessed in full.

Reference	Theme	Issue	Comments	Applicant's Response
			recreational equestrian activities are closely interconnected. Stud farms, competition yards, riding schools, veterinary practices, farriers, Pony Club activities, trail hunting, polo and private horse owners all contribute to the character of the locality and rely upon many of the same routes and infrastructure. This overall character is a defining feature of the equestrian setting.	
JF2-041	Socio-Economics, Tourism and Recreation	Equestrian Setting	7.4 This submission respectfully suggests that the equestrian receiving environment surrounding the Scheme may be more extensive, more concentrated, more interconnected and more sensitive to environmental change than is apparent from the Environmental Statement alone. I therefore ask The Examining Authority to consider this evidence alongside the Applicant's assessment when reaching its conclusions on receptor sensitivity and the significance of likely environmental effects.	The Applicant notes this comment and refers to the Equine Business Report [EN010168/EXAM/9.62] where these aspects have been assessed in full.

7.3 Dermot Farrington – Further Information Requested by the ExA

Table 7-3

Reference	Theme	Issue	Comments	Applicant's Response
DF-001	Socio-Economics, Tourism and Recreation	Equine Business	West Park Farm & Dermot Farrington Bloodstock Farm Submission to the Examining Authority at Deadline 4 Extra information as requested by planners. Lime Down Solar Park Development Consent Order (EN010168) Unique Reference Number: [REDACTED] West Park Farm is a commercial thoroughbred breeding and bloodstock enterprise and a key part of an international bloodstock business that has been a leading player in the thoroughbred industry for over 20 years. The farm provides specialist services including foaling, broodmare management, young stock rearing and	The Applicant notes this submission and where practicable has used this information to ensure the assessment of the equine businesses surrounding the Scheme, as presented in the Equine Business Report [EN010168/EXAM/9.62] takes account of all operations at West Park Farm & Dermot Farrington Bloodstock Farm.

Reference	Theme	Issue	Comments	Applicant's Response
			sale preparation to clients across the UK, Europe, Asia, Australia, USA and Japan many of whom entrust horses of very high monetary and sentimental value to our care. Daily routines include: Firstly, every morning horses are fed, in the paddocks next to the proposed LD sites. Horses are anxious to eat, and staff have to be careful not to get trampled as keen horses spar with each other and find their pecking order at each feed pot. If they get frightened by noises or activities across the fence there is a real danger that a staff member could be injured. Horses that have been stabled overnight are let out into paddocks during the day (especially in the winter). These horses are usually fresh (feeling very well because they've been standing in all night) and could easily be spooked by neighbouring activity causing them to bolt, increasing the risk of them kicking out at staff if they get loose and escaping out onto the public roads.	

Reference	Theme	Issue	Comments	Applicant's Response
			Bearing in mind, loose horses with leads attached tend to run blindly with fright and can easily jump 6ft perimeter gates. This alone provides great risk to my staff and the public especially when you consider our proximity of less than a mile to the A429. During the morning up until lunch time, horses may require vet work including treatments, routine vaccinations & scanning for pregnant mares. Normally most of these simple procedures would take place in the paddocks (where possible) however injecting horses next to an industrial site would provide an unacceptable risk to staff and vets. Other procedures that we normally try and do in the paddocks is farrier work which would be impossible to do, and our farrier has already told us that he won't continue to be our farrier if this goes ahead as it will be too dangerous. Generally, in the months of June to October we use our paddocks directly adjacent to the proposed site as it grows good grass and is the flattest paddock	

Reference	Theme	Issue	Comments	Applicant's Response
			on the farm to hand walk our yearlings as preparation to go to public auction. Up to 15 yearlings are hand walked for up to 1 hour each day and then turned out in paddocks that they have been walked in. As the horses are growing and being prepared for sale, they are on high protein energy diets in order to get them to their optimum and to achieve the best price at auction. The flip side of this is that these young horses can be difficult to handle and due to the change in environment when they actually go to a public auction many yearlings end up on sedation in order to reduce the risk to themselves and others. Sedation wouldn't be possible over prolonged periods. Once the yearlings have been sold, we generally get an influx of yearlings which we have purchased on behalf of clients, who stay for a short period so they can switch off after the sales. This can be a particularly risky time for these horses as they have been confined on high	

Reference	Theme	Issue	Comments	Applicant's Response
			protein diets and a different routine, so a quite safe environment is essential. Young horses also need a dust free environment. Dust generation during construction and ongoing maintenance will be problematic and present significant risk to respiratory health. Respiratory problems are the number one inhibitor to performance in a thoroughbred racehorse. Other tasks and depending on the time of year mares and foals or yearlings come into barns for 2 weeks / 3 hours /day every 6 weeks so catching and interacting with horses while machinery bangs and moves across the fence line will cause horses to spook. Because of the age and the short periods that horses stay at my farm it's impossible for my horses to even begin to adapt. Unlike many equestrian establishments, the majority of our horses are only with us for relatively short periods before sale or movement to training, meaning there is no realistic	

Reference	Theme	Issue	Comments	Applicant's Response
			opportunity for them to become accustomed to neighbouring activity. Evening Feeding takes place around 4pm with the same risks as the morning feed. Night time checks take place on dusk and it's essential that horses aren't spooked during the night especially mares that are normally heavily pregnant. One undisputed fact is on occasion our neighbour (where solar panels are proposed) has a pheasant shoot on his land and always calls to notify us so we can bring in all horses, this is only for three days on average per month during the shooting season and requires me to hire extra staff for those particular days. A project like Lime Down will make every day like this & makes our farm unviable with regard to cost and staffing. In conclusion we run a busy farm with ever changing horses depending on the time of year. The constant need for us to move and interact with horses with the prospect of constant ongoing construction and unpredictable	

Reference	Theme	Issue	Comments	Applicant's Response
			movement from operational activity taking place next to us unfortunately makes our business unviable. Many of these risks would continue throughout the 60 year operational life of the project due to ongoing maintenance, machinery, contractors, security activity and the movement of solar trackers immediately adjacent to our paddocks. Please find below the list of staff and businesses that we support in the local area and our approx. spend: Employees: 5 staff members and two part time (previously 6 prior to Lime Down application). On a temporary basis throughout the year a further 6-10 freelance staff are taken to assist at public auctions or on the farm. West Park Farm suppliers: • The National Stud ((last 10 years we have been one of their biggest clients) • John Toomers Feeds	

Reference	Theme	Issue	Comments	Applicant's Response
			• James Hazell Hay & Straw (Malmesbury) • Farrier (AP Farriery, Seagry) • Vets (Rosssdales in Lambourn, Tomlinson Equine, Westonbirt) • Newmarket Equine Hospital • Accountancy (Grosvenor House Practice, Kemble Airfield) • Hugo White Fencing and Farm Maintenance (Stroud) • Local Farm machinery merchants and mechanics • Hedge cutting/farm maintenance – local • Mole Valley Farmers (Cirencester) • IRT international horse transporters • Ben Greenwood Horse Transport (Cirencester) • 3 Dee's Builders, Gloucester • Farm insurance	

Reference	Theme	Issue	Comments	Applicant's Response
			Local Hotels and restaurants (client visits)	

7.4 Sam Allen – Accepted at the discretion of the Examining Authority

Table 7-4

Reference	Theme	Issue	Comments	Applicant's Response
SA-001	Ecology and Biodiversity	Wildlife and Grazing	I support the building of the solar farm overall however, as much as I understand the security requirements for such a site. The loss of green space for ecology should be of highest concern. The land seems to only ever be used for animal feed crops or pasture so it's not very productive. It would be great to see continued use of pasture with the land used as a hybrid of energy production/ grazing for the likes of sheep. But the ability of access to and from such a large parcel of land for all sizes of wildlife in such a large site should be a priority.	The Applicant notes this comment raising concerns relating to the loss of green space for wildlife, and continued access to the site for wildlife, as well as comments relating to grazing at the Solar PV Sites. Potential impacts on ecology and biodiversity are fully assessed in ES Volume 1, Chapter 9: Ecology and Biodiversity [REP4-010]. The assessment identifies avoidance, mitigation and enhancement measures to address potential impacts on habitats and protected and notable species. It also identifies opportunities for ecological enhancement, including the creation and long-term management of

Reference	Theme	Issue	Comments	Applicant's Response
				habitats and the delivery of biodiversity net gain, ensuring green space suitable for wildlife is maintained throughout the Order Limits. The Applicant has addressed access of wildlife to within the solar array (with regards to security fencing installation) in detail in the Applicant's Response to the Examining Authority's First Written Questions [REP3-128], responding to questions EB1.12 and EB1.13. In summary, perimeter security fencing would comprise wire mesh and wooden post fencing as shown in Paragraph 3.3.75 and Plate 3-14 of ES Volume 1, Chapter 3: The Scheme [APP-055]. This fencing would be permeable to the majority of terrestrial species assessed in ES Volume 1, Chapter 9: Ecology and Biodiversity [REP4-010], with the exception of deer. Deer are expected to be displaced from the interior of Solar PV Sites due to the presence of perimeter security fencing. However, the Scheme design has

Reference	Theme	Issue	Comments	Applicant's Response
				embedded unfenced buffers (minimum of 15 m) from all hedgerows and woodlands around the peripheries of the Solar PV Sites, which will allow wildlife, including deer, to move between favoured habitats. It is also noted however that the BESS compounds and substations will be secured by palisade fencing, which is expected to exclude most mammal species. The assessment identifies embedded and additional mitigation measures and concludes that, with these measures in place, no significant adverse effects are anticipated for protected and notable species, with the exception of ground-nesting birds of open habitats and hedgerows. Residual significant adverse effects remain at a local level of geographical importance for skylark and hedgerows, and at the site level for other ground-nesting bird species. As set out with ES Volume 1, Chapter 3: The Scheme [APP-055] at paragraph 3.5.29, that for the purposes

Reference	Theme	Issue	Comments	Applicant's Response
				of assessment and reporting of effects, as a reasonable worst case it is assumed that vegetation will be managed with machinery. However, should consent be granted, grazing by sheep will be explored, noting that there are no known landowner restrictive covenants or other reasons that would prevent such use.. Management prescriptions relating to sheep grazing are provided in the Outline LEMP [REP3-100]. This approach is set out within Paragraph 9.9.22 of ES Volume 1, Chapter 9: Ecology and Biodiversity [REP4-101].

7.5 Calvin Healy – Accepted at the discretion of the Examining Authority

Table 7-5

Reference	Theme	Issue	Comments	Applicant's Response
CH-001	Climate Change and Energy Need	Environmental Microclimate	I am writing to share specific concerns regarding the long-term environmental, microclimate, and hydrological impacts of expansive, ground-mounted solar	Paragraphs 17.10.17 to 17.10.19 of ES Volume 1, Chapter 17: Soils and Agriculture [REP3-022] address the risk of soil erosion from panel runoff in

Reference	Theme	Issue	Comments	Applicant's Response
	Soils and Agriculture Hydrology, Flood Risk and Drainage		infrastructure—such as the proposed Lime Down project— particularly when constructed on the region's heavy clay soils under shifting climate baselines. As the UK transitions toward the late 21st century, climate projections (such as the Met Office UKCP18 data) predict a significant increase in winter "atmospheric rivers," pushing winter rainfall intensity up by 25% to 35%. When massive arrays of impervious glass and metal solar panels cover hundreds of acres of open green fields, they introduce two critical hydrological risks to the local catchment area: 1. The "Drip Line" & Runoff Acceleration: Rainwater sheets off the panels rapidly in highly concentrated paths rather than distributing evenly. On poorly draining clay soils, this accelerates pooling and erosion. 2. Construction Soil Compaction: The use of heavy machinery during installation crushes the delicate pore spaces in clay.	relation to vegetation cover, soil texture, topography and soil stability beneath and between the Solar PV Panels, noting that the risk reduces under grass compared with land under arable cultivation. The Outline SRMP [REP4-053] includes best practice measures to minimise soil compaction during construction and operation. It includes requirements for ongoing monitoring of compaction and for remedial action to be undertaken while the land remains accessible to the machinery needed to address any issues identified. The soil will therefore enter the operation and maintenance phase of the Scheme in a suitable, uncompacted condition. The Applicant does not agree that the Solar PV Panels would convert the Solar PV Sites into low-permeability surfaces. The panels are elevated above the ground and are not connected to a positive drainage system. Rainfall will continue to reach the ground beneath and between the

Reference	Theme	Issue	Comments	Applicant's Response
			Once compacted, the soil loses its natural capacity to absorb water, turning fields into lower permeability surfaces. During heavy late-century winter storms, this combination means massive volumes of water will immediately become rapid surface runoff, rushing straight into local drainage ditches and significantly worsening flood risks for nearby low-lying communities and river boundaries (such as the River Avon catchment).	panel rows. While the panels may redistribute rainfall locally and create drip lines, this does not increase the overall rainfall volume or necessarily increase runoff reaching a field boundary or watercourse. The relevant hydrological risk depends on vegetation condition, soil structure, compaction, erosion and whether connected surface flow pathways are allowed to develop. These mechanisms are assessed in ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP4-012] and the site-specific ES Volume 3, Appendices 11-2 to 11-9: Flood Risk Assessment and Outline Drainage Strategies [REP4-023 to REP4-036 and REP3-036], and are controlled through the Outline CEMP [REP4-049] and the Outline SRMP [REP4-053]. Future rainfall conditions have also been taken into account through the climate change allowances applied within the flood risk and drainage assessments. The Scheme would retain existing

Reference	Theme	Issue	Comments	Applicant's Response
				watercourses, drainage features and overland flow routes, while runoff from formal impermeable infrastructure would be attenuated and controlled. The Applicant therefore does not agree that the Scheme would result in the uncontrolled generation of " <i>massive volumes</i> " of rapid surface runoff or a significant increase in downstream flood risk.
CH-002	Climate Change and Energy Need	Photovoltaic Heat Island Effect	Furthermore, the Photovoltaic Heat Island (PVHI) effect risks raising localized air temperatures immediately around these massive dark installations during increasingly severe summer heatwaves, worsening soil aridity.	Land beneath the solar panels will be shaded as well as vegetated which would have a cooling effect on the soil surface.
CH-003	Hydrology, Flood Risk and Drainage	Hydrological Compounding Factors	I request that these long term end of century hydrological compounding factors are rigorously weighed during the current examination phase of the Development Consent Order (DCO).	The long-term hydrological effects of climate change have been considered within ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP4-012] and the site-specific ES Volume 3, Appendices 11-2 to 11-9: Flood Risk Assessment and Outline Drainage Strategies [REP4-023 to

Reference	Theme	Issue	Comments	Applicant's Response
				REP4-036 and REP3-036] through the application of the relevant climate change allowances to the assessment of fluvial flood risk, surface water drainage and attenuation. The assessment also considers the potential effects of soil compaction, erosion, vegetation condition and local rainfall redistribution beneath Solar PV Panels. These risks are controlled through the Outline CEMP [REP4-049] and the Outline SRMP [REP4-053], including monitoring, remediation and verification requirements. The Applicant therefore considers that the relevant long-term and compounding hydrological risks have been appropriately assessed and addressed within the submitted application and subsequent Examination updates.