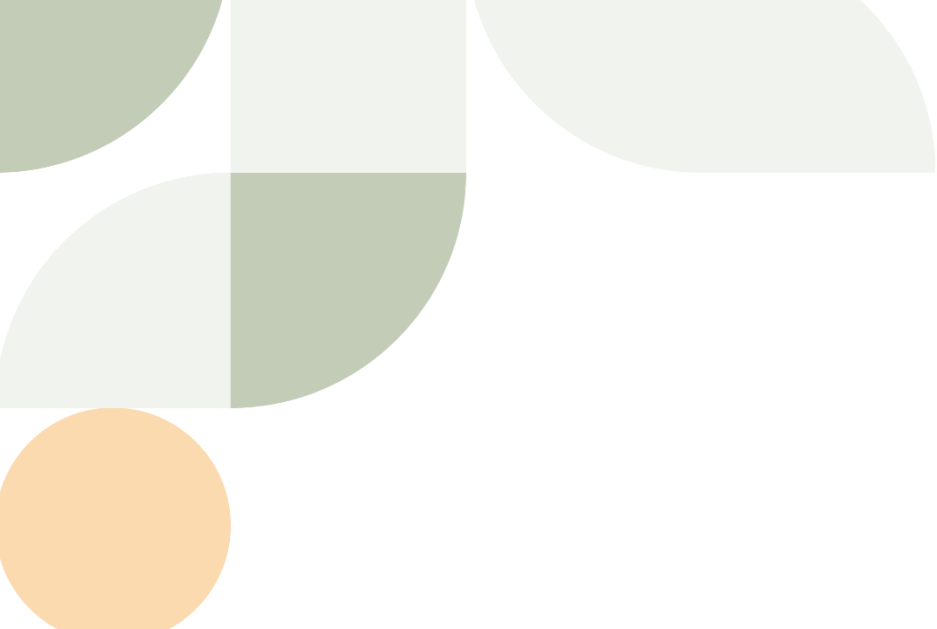




Lime Down

Solar Park

Statement of Common Ground with Wiltshire Council (Tracked)

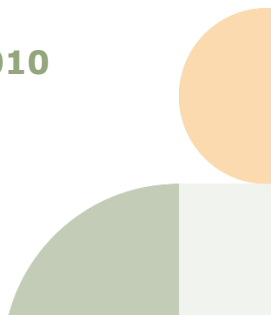
August~~July~~ 2026

Revision 32

Planning Inspectorate Reference: EN010168

Document Reference: EXAM/8.2

The Infrastructure Planning (Examination Procedure) Rules 2010



List of Contents

Statement of Common Ground Signatures	1
1 Introduction	2
1.1 Purpose of this Document.....	2
1.2 Parties to this Statement of Common Ground.....	2
1.3 Terminology.....	2
2 Record of Engagement.....	3
2.1 Summary of Consultation.....	3
3 Matters Raised	24
3.1 Principle of Development	24
3.2 Draft Development Consent Order Process.....	26
3.3 Climate Change and Energy Needs.....	34
3.4 Landscape and Visual.....	37
3.5 Ecology and Biodiversity	64
3.6 Arboriculture.....	149
3.7 Hydrology, Flood Risk and Drainage.....	175
3.8 Cultural Heritage (Built heritage and Archaeology)	233
3.9 Transport and Access	243
3.10 Noise and Vibration.....	282
3.11 Air Quality	290
3.12 Socio-Economic Tourism Recreation	292
3.13 Soils and Agriculture	312
3.14 Human Health	318
3.15 Other Environmental Matters	325

List of Tables

Table 2-1: Summary of Engagement	3
Table 3-1: Principle of Development	24
Table 3-2: Draft Development Consent Order.....	26
Table 3-3: Climate Change and Energy Needs.....	34
Table 3-4: Landscape and Visual.....	37
Table 3-5: Ecology and Biodiversity	64
Table 3-6: Arboriculture	149
Table 3-7: Hydrology, Flood Risk and Drainage.....	175
Table 3-8: Cultural Heritage (Built heritage and Archaeology)	233

Table 3-9: Transport and Access.....	243
Table 3-10: Noise and Vibration.....	282
Table 3-11: Air Quality	290
Table 3-12: Socio-Economic Tourism Recreation.....	292
Table 3-13: Soils and Agriculture	312
Table 3-14: Human Health	318
Table 3-15: Other Environmental Matters	325

Statement of Common Ground Signatures

This Statement of Common Ground has been prepared and agreed by Lime Down Solar Park Limited (the Applicant) and Wiltshire Council.

Signed on behalf of Lime Down Solar Park Limited

Name:

Position:

Date:

Signature:

Signed by the Wiltshire Council

Name:

Position:

Date:

Signature

1 Introduction

1.1 Purpose of this Document

- 1.1.1 This Statement of Common Ground (SoCG) has been prepared as part of the proposed Lime Down Solar Park Development Consent Order (the Application) made by Lime Down Solar Park Limited (the Applicant) to the Secretary of State for Energy Security & Net Zero (the Secretary of State) pursuant to the Planning Act 2008 (PA 2008).
- 1.1.2 This SoCG does not seek to replicate information which is available elsewhere within the Application documents. All documents are available in the deposit locations and/or the Planning Inspectorate website.
- 1.1.3 This SoCG has been produced to confirm to the Examining Authority (ExA) where agreement has been reached between the parties, and where agreement has not yet been reached. SoCGs are an established means in the DCO consenting process of allowing all parties to identify and focus on specific issues that may need to be addressed during the examination.

1.2 Parties to this Statement of Common Ground

- 1.2.1 This SoCG has been prepared by (1) Lime Down Solar Park Limited as the Applicant and (2) Wiltshire Council.
- 1.2.2 Collectively, Lime Down Solar Park Limited and Wiltshire Council are referred to as ‘the parties’.

1.3 Terminology

- 1.3.1 In the tables in Section 3 of this SoCG:
- “Agreed” indicates where the issue has been resolved.
 - “Not Agreed” indicates a final position, and
 - “Under Discussion” indicates where these points will be the subject of ongoing discussion wherever possible to resolve, or refine, the extent of disagreement between the parties.

2 Record of Engagement

2.1 Summary of Consultation

2.1.1 The parties have been engaged in consultation since 8 November 2023. A summary of the meetings and correspondence that has taken place between the Applicant and Wiltshire Council is outlined in Table 1-1.

Table 2-1: Summary of Engagement

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
5 August 2026	Online MS Teams Meeting between the Applicant and Wiltshire Council Officers	Meeting to discuss the Innovation Forum concept
4 August 2026	Online MS Teams Meeting between the Applicant and Wiltshire Council Officers	Steering Group meeting discussing project and programme updates.
4 August 2026	Online MS Teams Meeting between the Applicant and Wiltshire Council Officers	Meeting to discuss arboricultural matters
29 July 2026	Online MS Teams Meeting between the Applicant and Wiltshire Council Officers	Meeting to discuss S106 and further PPA
29 July 2026	Online MS Teams Meeting between the Applicant and Wiltshire Council Officers	Meeting to discuss Landscape and Visual matters. It was agreed by both parties that further engagement was required to meaningfully progress matters in relation to Landscape and Visual.
29 July 2026	Online MS Teams Meeting between the Applicant and Wiltshire Council Officers	Meeting to discuss Socio-Economics matters.

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
<u>29 July 2026</u>	<u>Online MS Teams Meeting between the Applicant and Wiltshire Council Officers</u>	<u>Meeting to discuss Built Cultural Heritage matters.</u>
<u>28 July 2026</u>	<u>Online MS Teams Meeting between the Applicant and Wiltshire Council Officers</u>	<u>Meeting to discuss Human Health matters.</u>
<u>28 July 2026</u>	<u>Online MS Teams Meeting between the Applicant and Wiltshire Council Officers</u>	<u>Meeting to discuss Soils and Agriculture matters.</u>
<u>27 July 2026</u>	<u>Online MS Teams Meeting between the Applicant and Wiltshire Council Officers</u>	<u>Meeting to discuss Ecology and Biodiversity matters and Arboricultural matters</u>
<u>24 July 2026</u>	<u>Online MS Teams Meeting between the Applicant and Wiltshire Council Officers</u>	<u>Meeting to discuss hydrology, flood risk and drainage matters and consolidating and simplifying the relevant section of the SoCG (Section 3.7). Following the call the two parties worked collaboratively to amend Section 3.7 to make it more focused and concise to aid all parties.</u>
<u>24 July 2026</u>	<u>Online MS Teams Meeting between the Applicant and Wiltshire Council Officers</u>	<u>Meeting to discuss archaeological matters</u>
8 July 2026	Online MS Teams Meeting between the Applicant and Wiltshire Council Officers	Meeting to discuss monitoring contributions
<u>8 July 2026</u>	<u>Online MS Teams Meeting between the</u>	<u>Meeting to discuss climate matters</u>

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
	Applicant and Council Officers	
7 July 2026	Online MS Teams Meeting between the Applicant and Wiltshire Council Officers.	Steering Group meeting discussing project and programme updates.
6 July 2026	Online MS Teams Meeting between the Applicant and Wiltshire Council Officer.	Meeting to discuss Hydrology, Flood risk and Drainage, matters.
3 July 2026	Online MS Teams Meeting between the Applicant and Wiltshire Council Officer.	Meeting to discuss Human Health matters.
30 June 2026	Online MS Teams Meeting between the Applicant and Wiltshire Council Officer.	Meeting to discuss Socio-Economics matters.
24 June 2026	Online MS Teams Meeting between Applicant and Wiltshire Council Officer.	Meeting to discuss topics in the SoCG relating to Public Rights of Way.
18 June 2026	Email to Wiltshire Council Ecology Officers	Provision of GIS dataset containing mapped Biodiversity Net Gain information, including baseline habitats, trees, hedgerows and watercourses along with anticipated retention, loss, creation and enhancement data of post-development features.
9 June 2026	Online MS Teams Meeting between the Applicant and Wiltshire Council Officers.	Steering Group meeting discussing project and programme updates.

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
28 May 2026	Email to County Archaeologist	Issue of archaeological evaluation reports
12 May 2026	Online MS Teams Meeting between the Applicant and Wiltshire Council Officers.	Steering Group meeting discussing project and programme updates.
5 May 2026	Site Visit	Site visit to consider potential for impact to Grittleton House as a result of cable and compound
30 April 2026	Email to Wiltshire Council.	Provision of the Applicant's technical note responding to Wiltshire Council's letter dated 24 March 2026 regarding the LLFA hydraulic modelling requirement for panel fields, access tracks and drainage connectivity.
24 April 2026	Online MS Teams Meeting between the Applicant and Wiltshire Council Officer.	Meeting to discuss Climate Change considerations.
14 April 2026	Online MS Teams Meeting between the Applicant and Wiltshire Council Officers.	Meeting to discuss highways matters in relation to the Draft Development Consent Order including: • Enforcement of Assigned Construction Routes; • Bonds for Highway Damages; • Liabilities, Insurance and Indemnity Cover; • Processes for Assigning Construction Contractors; • Highway Inspection Units; and

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
		Protective provisions.
14 April 2026	Online MS Teams Meeting between the Applicant and Wiltshire Council Officers.	Steering Group meeting discussing project and programme updates.
1 April 2026	Online MS Teams Meeting between the Applicant and Wiltshire Council Officers.	Meeting to discuss ecology and arboricultural matters including: - Hedgerow Removal & Rochdale Envelope Approach; - Arboricultural Method Statement; - Cable Route Corridor – Survey Scope/Impacts on Bats; - Biodiversity Net Gain Metric; - Cable Route Corridor Habitat Classification; - Otters and Water Voles – Cable Route Corridor; - Skylark Mitigation Approach; and - Great Crested Newts – District Level Licence.
01 April 2026	Email to Wiltshire Council.	Provision of Schedule of Changes to the Draft DCO to Wiltshire Council for comment.
27 March 2026	Email to Wiltshire Council.	Provision of Draft DCO (for submission at Deadline 1) to Wiltshire Council for comment.
26 March 2026	Online MS Teams Meeting between the Applicant and Wiltshire Council Officers.	Meeting to discuss the transport points raised by Wiltshire Council in their Relevant Representation.

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
24 March 2026	Email / letter from Wiltshire Council.	Provision of Wiltshire Council's LLFA hydraulic modelling requirement note, requesting quantitative hydrological / hydraulic modelling for panel fields, access tracks and drainage connectivity.
12 March 2026	Online MS Teams Meeting between the Applicant and Email from Wiltshire Council Officers.	Meeting to discuss the proposed changes to the built heritage management plans. Provision of Wiltshire Council update to Issues Tracker following review of DCO application documentation and Relevant Representation response.
10 March 2026	Online MS Teams Meeting between the Applicant and Wiltshire Council Officers.	Steering Group meeting discussing project and programme updates.
5 March 2026	Online MS Teams Meeting between the Applicant and Wiltshire Council Officers.	Meeting to discuss matters relating to socio-economics, tourism and recreation in Wiltshire Council's Relevant Representation.
2 March 2026	Online MS Teams Meeting between the Applicant and Wiltshire Council Officers.	Meeting to discuss matters relating to public rights of way in Wiltshire Council's Relevant Representation.
24 February 2026	Online MS Teams Meeting between the Applicant and Wiltshire Council Officers.	Meeting to discuss Wiltshire Council's comments on the draft Development Consent Order.
20 February 2026	Online MS Teams Meeting between the	Meeting to discuss matters relating to noise and vibration in Wiltshire

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
	Applicant and Wiltshire Council Officers.	Council's Relevant Representation.
18 February 2026	Online MS Teams Meeting between the Applicant and Wiltshire Council Officers.	Meeting to discuss the built heritage Relevant Reps and to agree approach going forward.
12 February 2026	Online MS Teams Meeting between the Applicant and Wiltshire Council Officers.	Meeting to discuss hydrology points raised in Wiltshire Council's Relevant Representation.
10 February 2026	Online MS Teams Meeting between the Applicant and Wiltshire Council Officers.	Steering Group meeting discussing project and programme updates.
13 January 2026	Online MS Teams Meeting between the Applicant and Wiltshire Council Officers.	Steering Group meeting discussing project and programme updates.
9 January 2026	Relevant Representation.	Wiltshire Council submitted a relevant representation to the Planning Inspectorate.
2 December 2025	Online MS Teams Meeting between the Applicant and Wiltshire Council Officers.	Steering Group meeting discussing project and programme updates.
19 November 2025	Online MS Teams Meeting between the Applicant and Wiltshire Council Officers.	Meeting to discuss the progress of the geophysical survey of the Cable Route Corridor
4 November 2025	Online MS Teams Meeting between the Applicant and Wiltshire Council Officers.	Steering Group meeting discussing project and programme updates.
29 October 2025	Email / letter to Wiltshire Council.	Notice under Section 56 of the Planning Act 2008 issued by the Applicant to Wiltshire Council.

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
22 October 2025	Letter to Wiltshire Council.	Tabular response to the points raised by Wiltshire Council on the Draft DCO as set out in their letter dated 5 September 2025.
7 October 2025	Online MS Teams Meeting between the Applicant and Wiltshire Council Officers.	Steering Group meeting discussing project and programme updates.
5 September 2025	Letter from Wiltshire Council.	Provision of comments from Wiltshire Council on the Draft DCO to be submitted as part of the DCO application received on 15 August 2025.
2 September 2025	Online MS Teams Meeting between the Applicant and Wiltshire Council Officers.	Steering Group meeting discussing project and programme updates.
28 August 2025	Online MS Teams Meeting between the Applicant, Wiltshire Council and Transport Planning Associates.	Meeting to confirm documents being submitted as part of DCO, confirmation of final study area, confirmation of proposed access arrangement to Lime Down D and E, discussion of methodology for link sensitivity though CNL, confirm details of trip generation methodology, set out proposed mitigation for AILs, confirm requirement for highway condition surveys, confirmation of additional swept-path analysis to be provided on construction routes.
22 August 2025	Email from Wiltshire Council.	Provision of Wiltshire Council comments on

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
		Issues Tracker received on 8 August 2025.
22 August 2025	Letter from Wiltshire Council.	Wiltshire Council response to Applicant's Potential Main Issues for Examination (PMIE) letter received on 8 August 2025.
15 August 2025	Letter to Wiltshire Council.	Applicant response to the letter received by Wiltshire Council on 29 July 2025 addressing the points raised.
15 August 2025	Email to Wiltshire Council.	Provision of the Draft DCO to Wiltshire Council for their comment.
13 August 2025	Online MS Teams Meeting between the Applicant and Wiltshire Council Officers.	Meeting to discuss the archaeological mitigation strategy.
8 August 2025	Email to Wiltshire Council.	Provision of updated Issues Tracker with inclusion of issues raised in Targeted Consultation response.
8 August 2025	Letter to Wiltshire Council.	Provision of draft PMIE letter for review and comment.
5 August 2025	Email to Clarkson & Woods Ltd. from Wiltshire Council ecology officer.	Provision of feedback as requested, subsequent to review of rationale presented in email dated 24 July 2025. Reiterated advice given during meeting on 14 July 2025 that the Council's stance is that a Zone of Influence (Zol) of at least 15km should be used from the Solar PV Sites. Also, advised that the Council considers the 500m Zol being used for the Cable

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
		Route Corridor to be insufficient.
29 July 2025	Letter from Wiltshire Council.	Points raised about the sharing of information in advance of the DCO application being submitted.
25 July 2025	Email to Wiltshire Council.	Provision of updated Issues Tracker with response from Applicant to points raised by Wiltshire Council in response of 4 June 2025.
24 July 2025	Email to Wiltshire Council ecology officer from Clarkson & Woods Ltd.	Further to the meeting on 14 th July 2025, Clarkson & Woods Ltd sent email with the objective of presenting the rationale for the Zol used to determine the assessment of potential cumulative effects on ecology. Review by, and response from Wiltshire Council's ecology officer was requested.
23 July 2025	Online MS Teams Meeting between the Applicant and Wiltshire Council Officers	Meeting to discuss the approach to the noise and vibration assessment and the additional information to be included in the ES further to that provided in the PEIR
17 July 2025	Online MS Teams Meeting between the Applicant and Wiltshire Council Officers	Meeting to discuss the agreed approach to assessing cumulative impacts and the methodology used to define the Zone of Influence (Zol) for the cultural heritage assessment
14 July 2025	Online MS Teams Meeting between the Applicant, Wiltshire	Meeting to discuss project updates and ecology issues.

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
	Council Officers and Clarkson & Woods Ltd.	Key topics included survey results and on-going surveys, cumulative assessment, strategic significance for Biodiversity Net Gain, ground-nesting bird mitigation and targeted consultation.
11 July 2025	Targeted -consultation response	Response to the targeted consultation received from Wiltshire Council.
8 July 2025	Email from the Applicant to Wiltshire Council	Email regarding update to the air quality assessment. Details of back-up generators provided.
8 July 2025	Online MS Teams Meeting between the Applicant and Wiltshire Council Officers	Steering Group meeting discussing project and programme updates.
13 June 2025	Letter from Wiltshire Council	Wiltshire Council response to the Applicant's letter of 23 May 2025 regarding cumulative lists
9 June 2025	Online MS Teams Meeting between the Applicant and Wiltshire Council Officers	Steering Group meeting discussing project and programme updates.
6 June 2025	Letter from Wiltshire Council	Provision of Wiltshire Council response to Adequacy of Consultation Milestone document received on 21 May 2025
5 June 2025	Email	Statutory notification under Section 42 of the Planning Act 2008 issued by the Applicant to Wiltshire Council for the launch of the targeted consultation

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
5 June 2025	Online MS Teams Meeting between the Applicant, Wiltshire Council and Transport Planning Associates	Meeting to discuss study area, confirmation of proposed access arrangements, discussion of methodology for link sensitivity though CNL, discuss details of trip generation methodology, set out proposed mitigation for ALLs, confirm requirement for highway condition surveys, confirm requirement for swept-path analysis to be provided on construction routes.
4 June 2025	Email from Wiltshire Council	Provision of Wiltshire Council comments on Issues Tracker received on 9 May 2025
3 June 2025	Email	Statutory notification under Section 42 of the Planning Act 2008 issued by the Applicant to Wiltshire for the launch of the targeted consultation
27 May 2025	Online MS Teams Meeting between Applicant, the Applicant and consultant on behalf of Wiltshire Council LLFA	Meeting to discuss flood and drainage updates to the scheme, Wiltshire Council Requests for DCO submission, Wiltshire Council Consultee Comments and actions taken since last statutory consultation meeting.
23 May 2025	Letter from the Applicant to Wiltshire Council	The Lime Down Solar Project response to the 6 December 2024 letter from Wiltshire Council providing feedback on the cumulative lists.

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
23 May 2025	Email from Applicant to Wiltshire Council	Air quality assessment summary provided and an updated version of the air quality supplementary planning guidance was requested.
21 May 2025	Email to Wiltshire Council	Provision of Adequacy of Consultation Milestone document for review and comment
19 May 2025	Online MS Teams Meeting between Applicant, the Applicant and Wiltshire Council Officers	Meeting to provide supplementary consultation to the LPA and an opportunity to discuss any outstanding issues and/or potential impacts and adopted mitigation commitments in relation to the Scheme's approach to arboriculture.
16 May 2025	Online MS Teams Meeting between Applicant, the Applicant and Wiltshire Council Officers.	Meeting to discuss geophysical survey of the Cable Route Corridor.
9 May 2025	Email to Wiltshire Council	Provision of initial Issues Tracker for review and comment
6 May 2025	Online MS Teams Meeting between Applicant, the Applicant and Wiltshire Council Officers.	Steering Group meeting discussing project and programme updates.
6 May 2025	Online MS Teams Meeting between the Applicant and Wiltshire Council.	Meeting to discuss the Archaeological Mitigation Strategy.

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
23 April 2025	In person meeting between the Applicant and Wiltshire Council Archaeology Officer.	Site meeting to view the archaeological evaluation trenches.
17 April 2025	Online MS Teams Meeting between the Applicant and Wiltshire Council Officers.	Meeting to discuss planned growth, the format of a DCO application and review process.
11 April 2025	In person meeting at Grittleton between Wiltshire Council and the Applicant.	Meeting and site visit to provide update on scheme from a built heritage point of view and understand any concerns regarding the western portion of the proposals.
9 April 2025	Online MS Teams Meeting between Applicant, the Applicant and Wiltshire Council Officers.	Meeting to discuss air quality methodology and statutory consultation feedback.
8 April 2025	Online MS Teams Meeting between Applicant, the Applicant and Wiltshire Council Officers.	Steering Group meeting discussing project and programme updates.
1 April 2025	Online MS Teams Meeting between the Applicant, Applicant and Wiltshire Council (██████████ Inward Investment Officer).	Meeting to discuss the assessment methodology and preliminary assessment outcomes for socio-economic assessment.
1 April 2025	Online MS Teams Meeting between the Applicant, Applicant and Wiltshire Council (██████████ - Public Health Specialist).	Meeting to discuss Community Relationship Manager and Local Mental Health support with public health.

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
24 March 2025	Online MS Teams Meeting between the Applicant, Applicant and Wiltshire Council.	Meeting to discuss the scheme in relation to materials and waste, scoping opinion response and statutory consultation responses.
24 March 2025	Online MS Teams Meeting between Applicant and Wiltshire Council Tree Officers.	Meeting to discuss draft tree impact plans detailing high-level arboricultural constraints data, PEIR Scheme Red Line Boundary and PEIR proposed layout.
19 March 2025	Online MS Teams Meeting between the Applicant, Noise Consultant and Wiltshire Council.	Meeting to discuss the scheme, methodology and noise surveys.
19 March 2025	Statutory consultation response.	Response to the statutory consultation received from Wiltshire Council.
17 March 2025	Online MS Teams Meeting between the Applicant, Wiltshire Council () and Transport Planning Associates.	Meeting to discuss study area and baseline conditions, construction programme and vehicle trip generation, construction vehicle access and routing, abnormal loads and outline public right of way management plans.
12 March 2025	Online MS Teams Meeting between Applicant, the Applicant (Lanpro and TPA), Wiltshire Council and Transport Planning Associates.	Meeting to discuss Construction Traffic Management Plan and Transport Statement Scoping Note. Discussing Template of Public Right of Way Management Plan. Discuss delivery of permissive access routes on the Scheme and

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
		improvements to the public rights of way network.
10 March 2025	Online MS Teams Meeting between Applicant, the Applicant and Wiltshire Council Officers.	Steering Group meeting discussing project and programme updates.
10 March 2025	Online MS Teams Meeting between the Applicant and Wiltshire Council Public Protection Team.	Meeting to discuss Specific issues (contamination, geology, private water supplies, mining/geohazards), Assessment methodology/ mitigation of risks and future engagement.
4 March 2025	Online MS Teams Meeting between the Applicant, Wiltshire Council and Clarkson & Woods Ltd.	Meeting to review the draft Technical Response to Statutory Consultation provided by Wiltshire Council, in relation to ecology. Key topics included Cable Route Corridor surveys, management proposals for the Site, worst-case scenario assessment, Bath and Bradford on Avon (BaBOA) Bats SAC, assessment of impacts on bats, and bird surveys.
4 March 2025	Online MS Teams Meeting between Applicant, the Applicant and Wiltshire Council Officers.	Meeting to discuss technical responses from Wiltshire Council to PEIR and onward approach to engagement in relation to public health.
27 February 2025	Online MS Teams Meeting between Applicant, the Applicant and consultant on behalf	Meeting to discuss Hydrology, Flood Risk and Drainage following receipt of draft comments from Wiltshire Council.

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
	of Wiltshire Council LLFA.	
4 February 2025	Hybrid Meeting at County Hall and Online MS Teams Meeting between Applicant, the Applicant and Wiltshire Council Officers.	The first Steering Group meeting that has been set up under the Planning Performance Agreement with Wiltshire Council.
20 January 2025	In person and Online MS Teams Meeting between Applicant, the Applicant, Community Liaison Lead and Wiltshire Council Officers and Council Members at Trowbridge County Hall.	Meeting to aid scheme understanding ahead of the launch of statutory consultation on 29 January 2025.
17 January 2025	Online MS Teams Meeting between the Applicant/ Lanpro, Wiltshire Council and Landscape officer and Cotswold National Landscape Officer (Re-scheduled meeting from 15 January 2025).	On site meeting to discuss landscape and visual matters.
13 January 2025	Hybrid Meeting at County Hall and Online MS Teams Meeting between Applicant, the Applicant, Consultants and Wiltshire Council.	Briefing to explain the Scheme discuss and the role of Wiltshire Council in the NSIP process and the upcoming statutory consultation .
6 December 2024	Letter from Wiltshire Council	Response to long and short lists for cumulative impact assessment received on 5 November 2024
6 December 2024	Letter from Wiltshire Council	Formal response on Statement of Community Consultation

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
20 November 2024	In person meeting between the Applicant and Wiltshire Council.	Site visit to discuss archaeological trenching.
19 November 2024	Online MS Teams Meeting between Applicant, the Applicant, Wiltshire Council Officers and Air Quality Officer	Meeting to discuss the scheme, methodology for the air quality assessment and scoping opinion feedback.
6 November 2024	In person meeting at County Hall between Applicant, the Applicant, Wiltshire Council Officers and Community Relations Lead.	DCO Strategic Update Meeting to provide a project update and to discuss the Statement of Community Consultation.
5 November 2024	Online MS Teams Meeting between Applicant, the Applicant, Wiltshire Council Officers and Hydrology, Flood Risk and Drainage Officer.	Meeting to discuss the scheme, scoping opinion feedback, surface water management for BESS/substations, surface water management for panelled areas and areas of concern.
5 November 2024	Email to Wiltshire Council.	Provision of long and short lists for cumulative impact assessment for review and comment.
4 November 2024	Online MS Teams Meeting between Applicant, the Applicant, Wiltshire Council Officers and Noise and Vibration Officer.	Meeting to discuss the scheme and methodology.
30 October 2024	Online MS Teams Meeting between the Applicant and Wiltshire Council.	Discuss approach to built heritage assessment and identify initial concerns.

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
22 October 2024	Email between the Applicant and Wiltshire Council ([REDACTED]) [REDACTED] [REDACTED]	Introductory email to provide project update.
10 October 2024	Online MS Teams Meeting between the Applicant, Wiltshire Council Public Health and OHID.	Introductory meeting to discuss approach to human health assessment, data sources, and community engagement.
2 October 2024	Email to Clarkson & Woods Ltd. from Wiltshire Council ecology officer.	Provision of dedicated Technical Note regarding Annex II bat roosts and associated consultation zones.
17 September 2024	Online MS Teams Meeting between the Applicant, Wiltshire Council and Clarkson & Woods Ltd.	Meeting to discuss ecology survey scope and scoping responses received from Wiltshire Council. Key topics included bat consultation zones along Cable Route Corridor, approach to bat surveys, farmland bird mitigation, dormouse survey, and assessment of impacts at Land near Melksham Substation and Cable Route Corridor. A PowerPoint presentation was provided by Clarkson & Woods outlining agenda, project overview, survey scope and consultation responses received to date from Wiltshire Council.
17 September 2024	Online MS Teams Meeting between Cotswold National Landscape, Wiltshire	To discuss comments made at Scoping by Wiltshire Council and the Cotswold National Landscape Board

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
	Council Landscape Officer and the Applicant	in relation to the landscaping assessment.
29 August 2024	Online MS Teams Meeting between Applicant, the Applicant and Wiltshire Council.	Meeting to discuss scope of archaeological evaluation works.
8 July 2024	Online MS Teams Meeting between Applicant, the Applicant and Wiltshire Council Planning,	Meeting to discuss the proposed Planning Performance Agreement ("PPA"), that was shared with Wiltshire Council by email on Friday 14 June 2024.
26 June 2024	Online MS Teams Meeting between Applicant, the Applicant and Wiltshire Council Officers	Meeting to introduce team, discuss project and programme updates and an engagement update.
31 May 2024	Online MS Teams Meeting between Applicant, Community Relations Lead and Wiltshire Council Member (██████████, Wiltshire Council).	Meeting to discuss project and any issues or concerns.
11 April 2024	Online MS Teams Meeting between the Applicant and Wiltshire Council.	Meeting to establish study area and approach for low background noise levels and night-time tracker panels.
12 March 2024	Online Zoom Meeting between Applicant, the Applicant and Wiltshire Council Member (██████████ ██████████)	Meeting to introduce team, Lime Down Solar Park proposals and Stage One Consultation.
6 March 2024	Online MS Teams Meeting between	Meeting to discuss Geophysics, the Land north of Whitley, and requirements

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
	Applicant and Wiltshire Council Archaeology.	of the Archaeological Assessment.
5 March 2024	Online MS Teams Meeting between Applicant, the Applicant, Wiltshire Council and Highways.	Meeting to discuss the development process, transport and access, cable routing and timescales.
5 March 2024	Online MS Teams Meeting between Applicant, the Applicant, Wiltshire Council and Communications Business Partner.	First briefing to enable the Communications Business Partner to understand more about the project and the proposals. This was essential given the local and national media interest and the need for the Wiltshire Council Communications team to have a greater understanding to respond to any media enquiries the council received.
15 January 2024	Hybrid Meeting at County Hall and Online MS Teams Meeting between Applicant, the Applicant, Wiltshire Council and Council Members.	Meeting to brief Council Members on project updates.
8 November 2023	Online MS Teams Meeting between Applicant, the Applicant and Wiltshire Council Planning.	Initial meeting between the Applicant and Wiltshire Council to introduce the Scheme and plan future engagement.

3 Matters Raised

3.1.1 This section sets out a table for each relevant topic, identifying where matters are agreed, still under discussion, or not agreed.

3.1 Principle of Development

Table 3-1: Principle of Development

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
3.1.1	Planning policy context in decision making	Wiltshire Council confirms that the Applicant has identified the appropriate legislative and national and local planning policy context for the Scheme, subject to a number of factors being suitably addressed, including flood and drainage, the landscape, particularly in and around AONB's (NL's) and appropriate consideration of cumulative effects The council's assessment in its Local Impact Report identified a number of local policies in which the council considered the proposed development was not in compliance with.	The Scheme needs to be considered under Section 104 of the PA 2008 and in assessing the merits of the Application it must be considered in accordance with the relevant national policy statement, with NPS EN-1, NPS EN-3 and NPS EN-5 being of primary importance, but regard must also be had to any local impact report and any other important and relevant matters, including the relevant Local Development Plan.	Under Discussion
3.1.2	Policy and planning balance	Wiltshire Council request further information from the Applicant before the council can make an objective balanced planning judgement on the	The Applicant considers that the planning balance applied to the Scheme as set out in Section 9 of the Planning Statement [REP3-081] has	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		merits of the proposed scheme and therefore adequately assess its compliance with the key policies.	been appropriately considered and the Scheme is acceptable in planning terms.	

3.2 Draft Development Consent Order Process

Table 3-2: Draft Development Consent Order

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
3.2.1	Legislation and Policy Draft Development Consent Order Process	Wiltshire Council commented on the Draft DCO before submission. Although the applicant responded, only minor changes were made, meaning most the council's concerns remain unresolved. As highlighted within its Relevant Representation, the council expects these issues to be properly addressed during the Examination. Additionally, the council has identified additional Requirements in its Written Representation and Local Impact Report. The council welcomes the opportunity to develop and agree protective provisions for the benefit of the local highway authority within the draft DCO.	The Applicant considered Wiltshire Council's comments and included them within the Draft DCO [REP43-0054] where practicable. Following further discussions with Wiltshire Council, an updated draft Development Consent Order was shared with Wiltshire Council on 1 April 2026 ahead of Deadline 1. This draft incorporated amendments discussed at the meeting between the Applicant and Wiltshire Council on 24 February 2026. The updated draft Development Consent Order was accompanied by a draft Schedule of Changes. Within this document, the Applicant explained specifically where an amendment was made to the Draft DCO [REP43-0054] in response to Wiltshire Council's comments. The Applicant also explained that where a suggested amendment was not made, this was because the point was already captured within relevant management	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			plans or would be more appropriately captured within updated management plans rather than the Draft DCO [REP43-0054] directly. Management plans were updated as part of the Applicant's submissions at Deadline 1, including in relation to points discussed at the meeting on 24 February 2026. It was agreed at a meeting between the Applicant and Wiltshire Council on 14 April 2026 that the Draft DCO [REP43-0045] would be updated for at a future deadline to include protective provisions for the benefit of Wiltshire Council as highway authority to address the concerns raised by Wiltshire Council relating to the streets works and highways powers in the Draft DCO [REP43-0045]. The form of protective provisions are currently being negotiated however the parties have agreed that the most recent draft will be included at Part 11 of Schedule 15 to the Draft DCO submitted at Deadline 4. These will be	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			subject to revision as negotiations progress. <u>The Applicant provided its most recent comments on the protective provisions to Wiltshire Council on 30 June 2026 and awaits Wiltshire Council's comments.</u> The Applicant welcomes ongoing engagement with Wiltshire Council and will consider any specific amendments Wiltshire Council suggests in relation to the Draft DCO [REP43-0054] or the management plans.	
3.2.2	Community benefits	Wiltshire Council is requesting amendments to the draft DCO and further details on the proposed Community Benefit Fund, including its total value, administration, and project eligibility criteria. The Council emphasizes that, given the scale of the development, the Fund must provide meaningful benefits to the affected local community if consent is granted.	The Applicant is committed to engagement with Wiltshire Council to discuss its recommendations for amendments to the Draft DCO [REP43-0045]. With respect to the Community Benefit Fund, the Applicant is committed to engagement with Wiltshire Council as a key stakeholder to ensure that the funding proposed is best utilised. The Applicant confirms however that discussions and agreements made on the Community Benefit Fund are separate from the DCO process.	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
3.2.3	Book of Reference and dDCO Land Rights and Acquisition Powers	The Book of Reference and draft Development Consent Order do not clearly specify the nature, extent or duration of the rights sought over land owned by the council or vested in the council as local highway authority, or the implications for the council's statutory functions and property interests. Clarification is required in order for the council to understand whether the inclusion of land within the Order Land, and the acquisition of rights over that land, satisfies the established necessity and proportionality tests under the draft DCO regime. In particular, the documents do not clearly identify the specific rights sought, whether those rights are temporary or permanent, or the extent to which they are required to deliver the proposed development. Without this information, the council is unable to assess whether the proposed acquisition of rights over highway land and other affected parcels is no more than is reasonably necessary, or whether the scope of the Order Land	Schedule 9 (Land in which only new rights etc. may be acquired) and Schedule 11 (Land of which temporary possession may be taken) to the Draft DCO [REP43-0045] list the specific plot numbers against the rights sought (both permanent and temporary respectively). In respect of Wiltshire Council's concerns in relation to highway works, the Applicant is progressing Protective Provisions for the protection of Wiltshire Council in its capacity as local highway authority. Negotiations as to the form of Protective Provisions are ongoing and, once agreed, these will be contained within Schedule 15 (Protective Provisions) to the Draft DCO [REP43-0045]. The Applicant anticipates that Protective Provisions will be agreed prior to the close of Examination. As noted above at 3.2.1, the Applicant has included the most recent draft of the protective provisions at Part 11 of Schedule 15 to the Draft DCO submitted at Deadline 4 (as agreed	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		could be reduced or refined without prejudice to the scheme. Where the acquisition of rights over adopted highway land is proposed, the council considers that this should be limited to what is strictly required and, where appropriate, addressed through bespoke side agreements or protective provisions rather than through the compulsory acquisition powers of the DCO.	with Wiltshire Council). These will be subject to revision as negotiations progress.	
3.2.4	Consistent approach to monitoring	Wiltshire Council have requested clarification on how monitoring will be implemented in relation to a number of management plans and topics. The Council's position is that the parties should enter into a Section 106 agreement to provide certainty of payment of monitoring costs for the scheme. Discussions are ongoing.	Wiltshire Council has requested clarification regarding the implementation of monitoring across a number of management plans and environmental topics. The Applicant and Wiltshire Council are continuing discussions to agree a consistent approach to payment of monitoring across the relevant management plans. The Applicant's position is that monitoring itself is appropriately secured through the Draft DCO and the relevant management plans. Schedule 2 of the Draft DCO requires the submission and approval of the final	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			management plans by Wiltshire Council (following consultation with relevant consultees where required) and requires the authorised development to be carried out in accordance with those approved plans. The outline management plans already identify monitoring requirements proportionate to the relevant topic, including, where appropriate, inspection regimes, environmental monitoring, reporting, review mechanisms and corrective actions. These arrangements will be developed and agreed with Wiltshire Council through the approval of the final management plans prior to the relevant phase of development commencing. The Applicant confirms it is still exploring with<u>has agreed with</u> Wiltshire Council the most appropriate that the mechanism for monetary contributions for mitigation and monitoring work <u>will be through a post-consent Planning Performance Agreement and a s106 agreement</u>, and that the agreed approach to monitoring contributions	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			will include an index linking mechanism. <u>The Applicant is preparing drafts of these documents and intends to provide these to Wiltshire Council for review following Deadline 5.</u> Two approaches are being considered. The first approach is for the Council to recover its costs under the Infrastructure Planning (Fees) Regulations 2010, as amended. The Applicant notes that the Guidance on cost recovery under these Regulations, published on 3 July 2026, advises that these will cover the provision of services post-decision and during implementation of projects. The second approach is for the Applicant to enter into a PPA with Wiltshire Council that will cover the costs associated with engagement prior to the formal discharge of requirements, to be conditional on the DCO being granted and progressed. The fees associated with the discharge of Requirements will be as provided for in Schedule 16 to the DCO, subsequent to which, a	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			section 106 agreement would be entered into to cover the costs of monitoring compliance with the approved plans. This approach enables the monitoring costs to be aligned to the monitoring included in the detailed plans, which will relate to the final Scheme following detailed design.	

3.3 Climate Change and Energy Needs

Table 3-3: Climate Change and Energy Needs

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
3.3.1	Legislation and Policy	Wiltshire Council provided no comment on the Legislation and Policy applied for the Climate Change assessment. The Applicant considers that Section 7.3 of ES Volume 1, Chapter 7: Climate Change [APP-059] has identified and appropriately considered all applicable legislation and policy.	The Applicant considers that Section 7.3 of ES Volume 1, Chapter 7: Climate Change [APP-059] has identified and appropriately considered all applicable legislation and policy.	Agreed
3.3.2	Methodology and Assessment Conclusions	Wiltshire Council notes that while lifetime carbon savings are significant, the timing of emissions is a concern. It notes that largest proportion of emissions are during construction-phase during a period when the UK is required to reduce emissions to meet net-zero targets. The proposal does not currently make it clear that carbon emissions are going to increase as a result of the project in the short to medium term, in order to achieve longer term gain in emissions reduction, and a decision must transparently consider these impacts.	The methodology adopted within Section 7.6 of ES Volume 1, Chapter 7: Climate Change [APP-059] has been derived from the information obtained through consultation with stakeholders and by reviewing relevant guidance and studies and is considered acceptable. Specifically, the comparison against UK carbon budgets is agreed as appropriate. Section 6 of the Climate Response to Wiltshire Council Appendix B of Written Rep and SLD Appendix J1 [REP3-132] clarifies the benefits vs impacts and the comparison with the carbon budgets.	Under discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		Wiltshire Council acknowledges that the methodology follows guidance that the appropriate approach is to consider the scheme's emissions in the context of UK carbon budgets as they are considered to be inherently cumulative. This results in a conclusion that the impacts are low, and the council has queried the conclusion about the significance derived using this methodology. Wiltshire Council's review of the submitted figures in ES Volume 1: Chapter 7 show that greenhouse gas emissions are substantial and that they may not be recovered through energy generation of the project. The council remains uncertain whether construction and operational-phase emissions could be further reduced and whether allocating nearly 0.5% of the 4th and 5th carbon budgets to this scheme represents an efficient use of those budgets, particularly in the absence of a national Strategic Spatial Energy Plan.		
3.3.3	Assessment Results	While the scheme's average carbon intensity is lower than that of the grid	The assessment results set out within Section 7.10 of ES Volume 1, Chapter	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		and would help reduce grid emissions, Wiltshire Council are concerned that this assessment does not fully account for upstream and downstream emissions from construction, maintenance, and decommissioning. These lifetime emissions are significant, and the council considers they should be acknowledged and weighed in decision-making and reduce as much as possible.	7: Climate Change [APP-059] including likely significant effects anticipated, are acceptable. Section 2 of the Climate Response to Wiltshire Council Appendix B of Written Representation and Stop Lime Down Appendix J1 [REP3-132] clarifies the emission calculations.	
3.3.4	Mitigation / Management Plans	Wiltshire Council request that mitigation listed for GHG emissions must include measures to reduce emissions as much as the current technology allows, and project planning must be flexible enough to allow for future innovations. This should be addressed through additional requirements in the draft DCO and through amendments to the respective outline management plans to ensure this is secured should the DCO be consented.	Measures to mitigate the emissions during each phase of the Scheme are included in the Outline CEMP [REP34-0492], Outline OEMP [REP43-09451] and Outline Decommissioning Strategy [REP3-096] respectively. These management plans will be developed into detailed documents and secured via requirements as set out in the Draft DCO [REP43-0054].	Under Discussion

3.4 Landscape and Visual

Table 3-4: Landscape and Visual

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
3.4.1	Development Plan Policy	The Council considers that the proposal does not and could not comply with the requirements of Wiltshire Core Strategy, Core Policy 51 (Landscape), due to the Location, scale, nature and magnitude of change over such a large protracted area adjacent to, and within the setting of the CNL (Lime Down Areas A, B & C). The application does not demonstrate satisfactory consideration of cumulative landscape and visual effects, or satisfactory resolution of factor (i) 'The Landscape, particularly in and around AONB's' as required by Core Policy 42 (Standalone renewable energy installations).	The Applicant notes this comment and will continue to progress discussion on these matters with Wiltshire Council.	Under Discussion
3.4.2	Visual Considerations	The representative photo viewpoints to be assessed were agreed with the Wiltshire Council landscape officer and CNL. Despite its very large size in a generally small-scale and intimate landscape, much of the proposed	The Applicant recognises and welcomes the Wiltshire Council's position on the agreement of viewpoint locations. It is agreed that much of the proposed development is relatively well-	Agreed

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		development is relatively well-contained visually from the wider landscape.	contained visually from the wider landscape due to the small-scale intimate character of the landscape.	
3.4.3	Viewpoint Photographs	The photography undertaken is good. However, the interpretation of the results and the presentation of relevant information is poor and is difficult to interpret. The notation on the viewpoint photographs is very sparse and includes nothing more than a rough indication of potential visibility of the site. For the orientation of the reader and to enable a proper assessment of visual effects to be undertaken, the following information is required and would normally be provided: PRow and road locations and any the relevant information and key features (e.g. Landscape features, prominent built form, woodland, identification of panel fields, substations and BESS locations etc.) While the Council notes the Applicant's intention to include annotation on submitted viewpoint photographs, it	The Applicant has provided the additional annotation to the viewpoint photographs to include the key features and information as suggested to help orientate the reader. ES Volume 2, Figure 8-14 Baseline Photography and Photomontages [REP2-010 to REP2-012] has been revised and submitted at Deadline 1. The request to identify panel fields, substations and BESS locations did not form part of the original request.	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		should have been included within the ES submission to help orientate and assist review. Submission at Deadline 1 is too late to review it. The Council recognises the addition of some key landscape features now labelled on baseline photography and photo-montages, but comments that this is still not that helpful to understand which fields are PV fields or fields with substations for many of these photo-viewpoints etc.		
3.4.4	ZTVs	Wiltshire Council believe the ZTV methodology is inadequate for complexity of the Project due to its limited scope, lack of detailed structural considerations, and failure to comprehensively analyse visibility impacts across sites, for example, relying initially on a limited bare-earth assessment, failing to specify structure heights or visibility assumptions, and not clearly assessing or combining the tallest elements across sites. The Council does not agree with the Applicant's position and has	The ZTV Methodology is set out in Section 4 of ES Volume 3, Appendix 8-1: Landscape and Visual Impact Assessment Methodology [REP1A-006], the Bare Earth ZTVs are shown on ES Volume 2, Figure 8-8 to 8-8-13 Bare Earth Zone of Theoretical Visibility (ZTV) [APP-097] and the Augmented ZTVs are shown on ES Volume 2, Figure 8-9 to 8-9-13: Augmented ZTV [APP-098]. The ZTV methodology has been consistent from Scoping and the LPA have had opportunity throughout the	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		consistently raised the cumulative ZTV methodology and lack of landscape Zol justification as an issue of concern.	ongoing consultation to respond. The ZTV methodology applied is appropriate and sufficient for the assessment. The Applicant notes this comment and will continue to progress discussion on these matters with Wiltshire Council.	
3.4.5	Landscape Zol	No justification included within Chapter 8 or its supporting Volume 3 appendices to justify Zol extents for the purpose of Landscape or Visual cumulative assessment. ES Vol 1, Chapter 21, Table 21-3 (2nd row) - The applicant states "In agreement with Wiltshire Council, the study area for the cumulative assessment was extended to 10km to consider the wider cumulative effects of solar development on the landscape". At no point has Wiltshire Council agreed or accepted that the <u>revised 10km</u> study area (extended from an initial 1km study area) forms an appropriate basis for the applicant's assessment of potential cumulative landscape effects i.e. for landscape character type 'Limestone lowland' and	The Applicant notes this comment and will continue to progress discussion on these matters with Wiltshire Council.	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		associated landscape character areas. Wiltshire Council's feedback and formal responses have consistently raised concern over this issue. The information included within the final DCO submission, confirms that the ZoI has been established on the basis of potential visibility. This does not appropriately reflect the scale, magnitude or temporal scope of cumulative landscape change to the receiving landscape character type from solar PV and BESS developments cumulatively impacting countryside at the 'landscape character type' and 'landscape character area' scale. Issue remains in relation to creeping baseline syndrome. The concern about this landscape character type and associated landscape character area/s of North & West Wiltshire incrementally turning into a new solar / BESS landscape is a clear trend that has been previously highlighted to the applicant. It is appreciated that Cumulative Assessment is complex, and needs to be proportionate to the task in hand, but the cumulative		

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		assessment should appropriately consider the scale, nature and temporal scope of existing operational solar / BESS development as part of Dynamic Baseline considerations, alongside the other solar PV and BESS developments with planning consent and currently in planning, otherwise the creeping baseline scenario will lead to under reporting of assessed effects in relation to the overall significance of cumulative change to landscape character.		
3.4.6	Assessment Methodology	The LVIA methodology follows standard best practice (GLVIA 3) and is set out in a separate appendix.	The methodology adopted within section 8.7 of the ES Volume 1, Chapter 8: Landscape and Visual [REP3-025] and ES Chapter 8 Appendix 8.1 LVIA Methodology [REP1A-006] follows the 'Guidelines for Landscape and Visual Impact Assessment' Third Edition (GLVIA3) and derived from consultation and engagement with stakeholders and by reviewing relevant guidance and studies and is considered acceptable to fully understand the extent of effects associated with the Development.	Agreed

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
3.4.7	Application of Assessment Methodology	The LVIA assessment outputs are unclear, sometimes inaccurate or incomplete, and lack transparency. A further technical note, to be submitted at Deadline 1, to clarify how landscape fabric and character in considered within the assessment, is unlikely to address the Council's concerns regarding the application of methodology used within assessment. This issue has been consistently raised by the Council. The council has considered the technical note within its written response to ExA's first written questions [ExQ1] -LV1.2 at pages 35-37 [REP3-142]. Its content does not alter the council's view. The council further highlights that the Technical Note appears to contradict itself at paras 3.1.9 and 3.1.10.	The Applicant's view is that the assessment is accurate and complete, but to assist the Council a technical note to clarify how landscape fabric and landscape character is considered within the assessment has been provided at Deadline 1 in 9.5 Technical Note on Landscape Fabric and Landscape Character [REP1-121]. No changes are proposed to the assessment methodology and this technical note is intended to provide clarification regarding Wiltshire Council's concerns surrounding the application of the methodology. The Applicant does not agree that there is a contradiction between paragraphs 3.1.9 and 3.1.10 of the 9.5 Technical Note on Landscape Fabric and Landscape Character [REP1-121] and considers that these explain the consideration and landscape character and fabric within ES Volume 1, Chapter 8 Landscape and Visual [REP3-025].	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			The Applicant will continue to progress discussion on these matters with Wiltshire Council.	
3.4.8	Embedded Design Mitigation	Embedded mitigation, such as layout changes, buffer strips, and landscape design parameters, is intended to reduce negative impacts and enhance the project. However, because the baseline landscape fabric has not been properly assessed, these measures may inadvertently harm the landscape, and it is unclear which measures are genuine enhancements versus mitigation. The LVIA findings should not be relied on to inform decision-making. (see comments under 3.4.7)	The approach and proposals for embedded mitigation set out within Section 8.9 of ES Volume 1, Chapter 8: Landscape and Visual [REP3-025], considers the landscape and visual matters associated with the Scheme as part of an iterative process, and is considered appropriate. Following the mitigation hierarchy, the layout of the proposals within the Order Limits have been developed to avoid adverse effects on sensitive areas, reducing negative / adverse effects of the Scheme on visual amenity and landscape character. Landscape mitigation has been used throughout the Scheme to further reduce adverse effects associated with the development. Enhancement measures are included within the Scheme for land within the setting of the CNL to further the	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			purposes of the CNL. This is expanded on in ES Volume 3, Appendix 8-6: Assessment of Effects on the Cotswolds National Landscape and its Special Qualities [APP-197]. As noted previously the effects on landscape fabric and landscape character are assessed separately. A technical note to clarify how landscape fabric and landscape character is considered within the assessment has been provided at Deadline 1 in 9.5 Technical Note on Landscape Fabric and Landscape Character [REP1-121]. No changes are proposed to the assessment methodology and this technical note is intended to provide clarification regarding Wiltshire Council's concerns surrounding the application of the methodology. The Applicant will continue to progress discussion on these matters with Wiltshire Council.	
3.4.9	Embedded Mitigation	Low hedgerows currently allow for longer views and appreciation of the wider landscape, which would be	The LVIA recognises where longer views and appreciation of the wider landscape, would be impacted by the	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		impacted by the visual mitigation strategy. Double width hedgerows and lines of regularly spaced trees are not representative fabric components of the receiving local landscape. The Council agrees to further discussions on these matters with the applicant.	visual mitigation strategy. The proposed mitigation planting is set out in the Outline LEMP [REP3-100] and includes for substantial areas of new woodland, hedgerow and meadow planting, which once established would provide positive contributions to the countryside in line with the Wiltshire's Nature Recovery Strategy. It is agreed that the mitigation planting, particularly allowing hedgerows to become taller and maintained to a height of 4.5m would cause a change in landscape character and loss of longer views over the landscape in some places. This change has been recognised within both the landscape and visual assessments. Measures to mitigate visual effects are set out in the Outline LEMP [REP3-100] to be secured through Requirement 7 in Schedule 2 to the Draft DCO [REP43-0054]. However, it is noted that not all of Wiltshire's hedgerows are maintained to a low height and this change would not be significant or permanent as	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			hedgerows could be clipped low again following decommissioning. The Applicant will continue to progress discussion on these matters with Wiltshire Council.	
3.4.10	Landscape and Ecological Management Plan	The draft DCO requires submission of a Landscape and Ecology Mitigation and Enhancement Plan and a LEMP setting out details for future maintenance, monitoring and management of the scheme for LPA approval, both of which may be refined under the Rochdale Envelope principles. At present the scheme and the landscape proposals are considered too vague to agree this and the council lacks confidence as to the appropriate detail of the proposals, notably in relation to establishment and efficacy of landscape planting, and adaptive management during the operational lifetime of the Scheme. The Council agrees to further discussions on these matters with the applicant.	The detailed landscape proposals will consist of the area and extent of the Scheme shown on ES Volume 2, Figure 3-4-1 to 3-4-5.2: Landscape and Ecology Mitigation Plan [REP1-029 to REP1-032]. The Outline LEMP [REP3-100] is secured by Requirement 7 of Schedule 2 of Draft DCO [REP34-0054]. The Applicant will continue to progress discussion on these matters with Wiltshire Council.	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
3.4.11	Landscape and Ecological Management Plan: Landscape and Ecological Improvements	The ES's current Landscape and Ecology Mitigation and Enhancement Plan/s will likely need updating, following further refinement of the scheme, and the DCO should ensure these plans are coordinated, along with Requirement 9 on 10% BNG, to avoid conflicts and provide a clear framework for future enforcement and monitoring. The outline LEMP and the Landscape and Ecology Mitigation and Enhancement Plans provide a broad framework for final documents but lack sufficient detailed site considerations or certainty to be agreeable at present. The final LEMP must include site-specific prescriptions for Sites A–E and the CRC, linked to clear plans showing spatial arrangements of features and management, ensuring mitigation identified in the LVIA is delivered. The CRC should be included with a potentially shorter-term LEMP, and site-specific grouping is recommended for clarity and practical use.	The landscape and ecological improvements are set out in the ES Volume 2, 3-4-1 to 3-4-5.2: Landscape and Ecology Mitigation Plan [REP1-029 to REP1-032]. The Outline LEMP [REP3-100] are considered acceptable. Following further development of the Scheme, more detailed planting plans including detail of areas of landscape mitigation, location and types of planting (species), as well as number, density and specification will be provided prior to any works commencing. The Final LEMP for the Scheme will include site-specific prescriptions for Sites A–E and the CRC as required, to ensure the mitigation proposals are delivered. The Applicant will continue to progress discussion on these matters with Wiltshire Council.	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		It is acknowledged and welcomed that the Applicant agrees that a final detailed LEMP for the scheme will include the CRC. It is agreed that following further development of the scheme, more detailed planting plans including detail of areas of landscape mitigation, location and types of planting (species), as well as number, density and specification need to be provided and approved prior to any works commencing. The Council agrees to further discussions on these matters with the applicant.		
3.4.12	Landscape and Ecological Improvements	The Council does not agree that this could be viewed as a landscape led scheme due to the scale and contrasting nature of the development proposed and the resulting changes to the character and visual and recreational amenity value of the baseline landscape within the setting of the CNL.	As the design of development has followed a landscape led approach, where cross disciplinary constraints and opportunities have been considered from the outset, it is entirely appropriate for some design features to be relied on as both ecological and landscape enhancement as well as mitigation.	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		There are concerns that some essential mitigation measures necessary to address ecological harm are being presented and possibly double counted as landscape enhancements, without adequately acknowledging the harm they aim to mitigate or compensate for. This could potentially affect the assessment scores. Such considerations are relevant to the evaluation of positive environmental enhancement within the overall planning balance. It is the Council's view that if the Applicant is referencing ecological enhancement as a positive landscape effect within the LVIA, the assessment should be consistent and transparent and therefore also acknowledge that where there is assessed ecological harm, this could represent a negative landscape effect within the LVIA. The Council agrees to further discussions on these matters with the applicant.	NPS EN-1 further supports this by recognising at para 5.10.5 "<i>...there may also be beneficial landscape character impacts arising from mitigation.</i>" A technical note to clarify how landscape fabric and landscape character is considered within the assessment has been submitted at Deadline 1 [REP1-121] No changes are proposed to the assessment methodology and this technical note is intended to provide clarification regarding the LPA's concerns surrounding the application of the methodology. The Applicant will continue to progress discussion on these matters with Wiltshire Council.	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
3.4.13	Construction Landscape Assessment results	The LVIA assesses landscape and visual effects across construction, operation, maintenance, and decommissioning, but Wiltshire Council believe the construction phase has been underestimated. Indicative assessments ignore key elements like land use change, access, and infrastructure, leading to likely underestimation of both construction and early operational effects on landscape fabric alongside tranquillity and perceptual aspects of character and place. The Council disagrees that key landscape fabric components or character have been robustly assessed.	The Landscape Assessment set out in ES Volume 1, Chapter 8: Landscape and Visual [REP3-025] are considered appropriate. Land use change is robustly assessed in the assessment of effects on Landscape Character. A technical note to clarify how landscape fabric and landscape character is considered within the assessment provided at Deadline 1 in 9.5 Technical Note on Landscape Fabric and Landscape Character [REP1-121]. The Applicant will continue to progress discussion on these matters with Wiltshire Council.	Under Discussion
3.4.14	Landscape Assessment results	The Council does not accept the results set out within Section 10 of the ES, Volume 1, Chapter 8: Landscape and Visual [APP-060], including likely significant effects anticipated, as accurate and appropriate. The ES underestimates the long-term effects on landscape fabric, overstating	The Landscape assessment results set out within Section 10 of ES Volume 1, Chapter 8: Landscape and Visual [REP3-025], including likely significant effects anticipated, are accurate and appropriate. The LVIA has recorded Moderate /Minor Adverse effects on Landscape	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		mitigation benefits by Operation Year 15. Decommissioning is likely to cause adverse effects similar to construction, with only a Neutral or Minor Beneficial effect achievable if all infrastructure is removed. It is unlikely that parties will reach agreement on these matters.	Character at Year 15 within the 1km Study Area which reduces to Minor Adverse at Decommissioning. On landscape fabric, the assessment recognises the positive effect of mitigation at the Site level as proposed planting matures and records Moderate Beneficial (Significant) by Year 15. The Applicant will continue to progress discussion on these matters with Wiltshire Council.	
3.4.15	Visual Assessment Results	Wiltshire Council provided comments on the visual assessment presented in the ES within its Relevant Representation [RR-4934] at paras 8.38, 8.39, 8.43 and 8.47. There is outstanding concern that a number of apparent viewpoints where there are significant adverse impacts have not been referenced in 8.3.3 [APP-192]. If these public receptors have not been assessed in the proper manner, with a photographic record, this work should be undertaken and included in the ES document at this stage.	The Visual Assessment set out in ES Volume 1, Chapter 8: Landscape and Visual [REP3-025] is considered appropriate. The representative viewpoints support the assessment of visual effects and have been appropriately referenced in the assessment of the visual receptors where applicable in ES Volume 3, Appendix 8-3-2-2: Landscape and Visual Assessment Sheets (Significant) [APP-191] and ES Volume 3, Appendix 8-3-3: Summary of Visual Effects [APP-192].	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		The Council agrees to further discussions on these matters with the applicant.	Tables 8.20, 8.21 and 8.22 in Chapter 8 of the ES text in ES Volume 1, Chapter 8: Landscape and Visual [REP3-025] in the LVIA provides a summary of the Significant Visual Effects in accordance with EIA procedure. In accordance with GLVIA3 (paragraph 6.19) 'representative viewpoints, have been selected to represent the experience of different types of visual receptor, where larger numbers of viewpoints cannot all be included individually and where the significant effects are unlikely to differ – for example, certain points may be chosen to represent the views of users of particular public footpaths and bridleways'. It is considered that the submitted photography is representative of the visibility of the Scheme and the photography provided from the agreed viewpoints is suitable to assist the reviewer's and decision maker's understanding of the both the	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			landscape and visual context and effects of the Scheme. The Applicant will continue to progress discussion on these matters with Wiltshire Council.	
3.4.16	Cumulative Visual Effects – In combination	The Council remains concerned that cumulative visual effects have not been adequately considered within the assessment. An assessment of cumulative visual effects of Sites A-E should be undertaken in two parts. Firstly, a combined or in combination assessment is required, which will be undertaken to cover a) where more than one site is visible in a viewing arc; b) where the receptor turns and is able to see another, or several other sites, in 360 degrees but without moving from the viewpoint location. The Council agrees to further discussions on these matters with the applicant.	Cumulative visual effects of Sites A-E have been assessed. For each visual receptor assessed the visibility of the Scheme was identified to the Site in closest proximity and secondly to the visibility of any other Lime Down Site. These effects are referred to as ‘Cumulative Site Effects’ and are set out in ES Volume 3, Appendix 8-3-2-2 Landscape and Visual Assessment Sheets (Significant) [APP-191]. There are very few receptors where cumulative site effects were identified. Receptor TP097 Bridleway WT SHER 16 is an example where cumulative site effects were identified. The initial assessment noted: “The Bridleway passes through the centre of Site A and there is direct visibility to A2, A3, A7, A8, A9 and A10. There are also longer distance views towards	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			Lime Down Site C from the southern end of the Bridleway near Lordswood Farm beyond intervening vegetation". The effects of Site A are assessed first which identified Major/ Moderate Adverse effects. In considering the effects of the additional visibility of Site C which is visible in longer distance views beyond intervening vegetation from the eastern end of the Bridleway, the assessment concluded <i>"This would not increase the effects above those described above"</i> for Site A (see ES Volume 3, Appendix 8-3-2-2: Landscape and Visual Assessment Sheets (Significant) [APP-191]). As noted previously the assessment is receptor based and not viewpoint based. As such, 360 degree views are considered in the assessment. The Applicant will continue to progress discussion on these matters with Wiltshire Council.	
3.4.17	Cumulative Effects – Inter-Project	Wiltshire Council request that cumulative effects with other nearby solar/BESS projects up to 10 km,	Inter-project cumulative effects occur when the impacts of one development interact with the impacts of other	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		including the CRC, be assessed beyond ZTVs using desk studies, site visits, and photography. The 10km landscape and visual cumulative Zol or study area, was determined by the Applicant as suitable for their cumulative landscape and visual assessment. The Council believes that cumulative Zol limits should therefore be adhered to. The Council remains concerned that cumulative landscape and visual effects have not been adequately considered within the assessment, highlighting in particular the Limestone Lowland Landscape Character Type. The Council has consistently raised concerns about the applicant's approach to cumulative landscape assessment, questioned justification of the landscape Zol limits, and raised specific concerns of past, present and future solar and BESS developments cumulatively and incrementally changing the landscape at a Landscape Character Type and Landscape Character Area level,	developments. It involves the interaction of impacts from different projects (nearby solar/BESS projects), potentially leading to a combined effect that is more significant than the sum of individual impacts. There are nine existing solar schemes which are considered within the LVIA for the Scheme. These nine existing solar schemes are considered within the baseline cumulative assessment. Thirteen cumulative development Sites have been included in the cumulative effects assessments as set out in Section 13 of ES Volume 1, Chapter 8: Landscape and Visual [REP3-025]. Inter project landscape and visual effects are assessed in the third Table of the Visual Assessment Sheets against the 13 included Developments Sites listed in Table 8-31 in Section 13 of ES Volume 1, Chapter 8: Landscape and Visual [REP3-025]. No visual relationship was recorded between any of the identified Cumulative Development Sites and the assessed visual receptors. As such	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		raised at Scoping, PEIR, and Relevant Representation consultation stages. The applicant has undertaken and submitted into the examination a series of technical notes (9.5; 9.6; 9.7). For clarity, these were not submitted at the request of Wiltshire Council, they have been submitted in response to the Council's and other IP's observations and comments made pertaining to ES, Vol 1, Chapter 8 [APP-060]. The Council agrees to further discussions on these matters with the applicant.	there are no significant cumulative visual effects. This is due to the generally small-scale and intimate landscape, where much of the proposed development is relatively well-contained visually from the wider landscape. The Applicant has undertaken and submitted the following at Deadline 1 at the request of Wiltshire Council: • 9.5 Technical Note on Landscape Fabric and Landscape Character [REP1-121]; • 9.6 Technical Note on Intra Project Cumulative Visual Effects [REP1-122]; and • 9.7 Technical Note on Cumulative Sequential Visual Effects [REP1-123]. The Applicant will continue to progress discussion on these matters with Wiltshire Council.	
3.4.18	Cumulative Visual Effects –	Secondly, a sequential assessment of visual effects should be required along well-used routes, including the Fosse	As shown by the example of Receptor TP097 above, sequential visual effects of the Scheme on individual receptors	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
	Sequential Point 1	Way, PRoW and minor roads, which the Council believe is not adequately assessed currently in the ES, because the ES does not describe the changing effects along the routes including rural roads linking village settlements, instead focusing on major roads despite GLVIA3 guidance applying to all regularly used routes. The Council does not agree with the Applicant that the land within the scheme simply comprises discrete areas. The disaggregated nature of the scheme areas increases the likelihood and potential for sequential visual effects to be experienced over a large area. Whether the scheme can be viewed or perceived in its entirety is not determinative to the consideration of cumulative sequential visual effects. The Council agrees to further discussions on these matters with the applicant.	have been addressed in the visual assessment. In accordance with Table 7.1 of GLVIA3 which states “<i>sequential effects may be assessed for travel along regularly used routes such as major roads or popular paths</i>” the LVIA in Table 8-23 of ES Volume1, Chapter 8 Landscape and Visual [REP3-025] identifies the following publicised routes where there are sequential visual effects: • The Macmillan Way; • The White Walls Way (Stage 3); • Sherston Walk 2; and • The Fosse Way. As the routes are made up of lots of individual sections of various footpaths, bridleways, roads etc., Table 8-33 also identifies the PRoW and Public Highway Receptors which have been fully assessed in the Visual Assessment. Sequential Effects for users of these Recreational Routes are not	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			considered to be any greater than those effects identified for the individual sections as set out within ES Volume 3, Appendix 8.3 series [APP-189 to APP-197, REP4-019, APP-199]. Whilst it is recognised that there would be an appreciation of an overall increase in solar infrastructure as users of these routes move through the landscape, due to the discrete areas of land within the Scheme and the rolling topography of the landscape, the Scheme would not be perceived in its entirety and the solar panels are distributed 'in and amongst' the landscape features helping to assimilate them into the landscape. The Applicant has undertaken and submitted the following at Deadline 1 at the request of Wiltshire Council: • 9.5 Technical Note on Landscape Fabric and Landscape Character [REP1-121];	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			• 9.6 Technical Note on Intra Project Cumulative Visual Effects [REP1-122]; and • 9.7 Technical Note on Cumulative Sequential Visual Effects [REP1-123]. The Applicant will continue to progress discussion on these matters with Wiltshire Council.	
3.4.19	Cumulative Visual Effects – Sequential Point 2	Sequential visual effects need to be treated as described above. It is of concern to the LPA that the effects on users of the Fosse Way have not been fully addressed. The sequential assessment should include the Newton Dairy, Long Newton Airfield and Upper Marsh Farm installations, north of Malmesbury before proceeding to Lime Down Sites B and C. Further potential sequential effects should be assessed along the A429 / A350 route from west of Charlton Park (north of Malmesbury); passing Rodbourne Rail solar farm; south to Lime Down Sites D & E; then land at Red Barn NE of Kington St Michael. It does not appear that these sequential assessments	The Applicant has undertaken and submitted 9.7 Technical Note on Cumulative Sequential Visual Effects [REP1-123] at Deadline 1 at the request of Wiltshire Council. The Applicant will continue to progress discussion on these matters with Wiltshire Council.	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		have been undertaken as part of the ES. The Council considers it inappropriate to assume that combined impacts cannot exceed those of individual sites, and concludes that intra-project cumulative landscape and visual effects must be assessed separately from site-specific impacts, particularly given the dispersed nature of Sites A–E. The Council agrees to further discussions on these matters with the applicant.		
3.4.20	Cumulative Visual Effects - Intra Project	Combined intra-project viewpoints can be simply ascertained by utilising a detailed ZTV methodology, suitable for the project scale, as detailed above in ZTV and Zol. In relation to the Council's position, the Applicant references factors, which are not relevant to the Council's concerns. The Council agrees to further discussions on these matters with the applicant.	As set out in Section 13 of ES Volume 1, Chapter 8: Landscape and Visual [REP3-025] there are two main types of cumulative effects in EIA. These relate to how multiple projects or multiple impacts from a single project combine to affect the environment. Intra or in combination effects are impacts from different aspects of the same project. For example, this can happen during construction if a receptor is subjected to noise, dust,	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			and visual impacts associated with site works. In the ES, this type of effect is considered in Volume 1, Chapter 21: Cumulative and In-Combination Effects [APP-073]. The Applicant has undertaken and submitted 9.7 Technical Note on Cumulative Sequential Visual Effects [REP1-123] at Deadline 1 at the request of Wiltshire Council. The Applicant will continue to progress discussion on these matters with Wiltshire Council.	
3.4.21	Inter project cumulative landscape and visual Effects	The Council considers it inappropriate to assume that combined impacts cannot exceed those of individually assessed sites, and concludes that intra-project cumulative landscape and visual effects must be assessed separately from site-specific impacts, particularly given the dispersed nature of Sites A–E. The Council does not agree that the LVIA robustly assesses cumulative landscape and visual effects, in	The LVIA robustly assesses the landscape and visual effects of the individual Sites and the Cumulative Site effects or otherwise referred to as the Scheme effects. However, due to the dispersed nature of the Sites and the generally small-scale and intimate landscape, much of the proposed development is relatively well-contained visually from the wider landscape.	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		particular cumulative landscape effects over the project's large footprint area, which is a key part of the Council's concern with the Applicant's LVIA assessment for character and fabric, and sequential visual. The Council agrees to further discussions on these matters with the applicant.	The Applicant will continue to progress discussion on these matters with Wiltshire Council.	
3.4.22	Protected / valued landscape status	The Council considers Lime Down Areas A, B and C fall within the setting of the Cotswolds National Landscape (CNL). The Council considers Lime Down Areas D and E to fall outside of the setting of the CNL. As such, Lime Down Areas A, B and C are considered to comprise higher value landscape which is highly sensitive to the changes that will arise from the location, scale and nature of the development being proposed. The Council agrees to further discussions on these matters with the applicant.	The applicant agrees that Lime Down Sites A, B and C are within the setting of CNL and have a higher value than Lime Down Sites D and E. In ES Volume 1, Chapter 8: Landscape and Visual [REP3-025] the CNL, as a designated landscape is assessed as High Value and High Sensitivity. Lime Down Sites A, B and C within the 1 km and 2km Study Areas which are within the setting of the CNL are assessed as High to Medium Value and High to Medium Sensitivity. Sites D and E within the 1 km and 2 km Study Areas are assessed as Medium Value and Medium Sensitivity.	Agreed

3.5 Ecology and Biodiversity

Table 3-5: Ecology and Biodiversity

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
3.5.1	Legislation and Policy	Wiltshire Council notes that the ES identifies relevant ecological legislation and planning policy, including national policy and emerging Wiltshire Local Plan policies. Nonetheless, the Council has raised concern that given the extent of the Order Limits and the scale and nature of the proposed Scheme, there will inevitably be adverse effects on priority habitats / habitats of principal importance (HPI) listed under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006, such as on account of hedgerow removal, and on protected species, species of principal importance (SPI) and Birds of Conservation Concern (BoCC). The Council therefore considers it unlikely to be possible for the proposed Scheme to wholly comply with all requirements of national and local planning policy.	The Applicant considers that ES Volume 1, Chapter 9: Ecology and Biodiversity [REP4-0154-010] has identified and appropriately considered all applicable legislation and policy. The Applicant acknowledges that some adverse ecological effects are unavoidable. These are transparently reported within ES Volume 1, Chapter 9: Ecology and Biodiversity [REP4-0101-015] and are summarised within the residual effects summary tables (Table 9-14 and 9-15)	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		The Council does not wholly agree with the Applicant's Position statement on this matter and considers that the potential for adverse effects on ecological features and receptors as a result of proposals in the Cable Route Corridor during construction in particular, have been under-estimated. This issue was also raised in the Council's statutory consultation response (March 2025).		
3.5.2	Rochdale Envelope Approach	Wiltshire Council is concerned that worst-case parameters have not been fully assessed in the ES and the Habitats Regulations Assessment Report (HRA) [APP-275] as is required given that the Applicant has opted to rely on the 'Rochdale Envelope' approach; and that the ES does not fully explain how it has been ensured that all related assessments have been based on the worst case scenario. Although Schedule 12 of the Draft DCO [APP-016] effectively sets out the worst-case scenario in line with the principles required when adopting the	<u>The extent and purpose of the design flexibility sought is defined in ES Chapter 3 [APP-055] and follow Advice Note Nine.</u> <u>ES Chapter 9 [REP4-011] applies precautionary worst-case assumptions, including the reasonably anticipated maximum land take, infrastructure footprint and construction timescales, and assesses realistic worst-case effects on all ecological receptors.</u> <u>The approach taken in ES Chapter 9 [REP4-011] and the HRA Report [REP3-090] has been agreed with Natural England for matters within their</u>	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		'Rochdale Envelope' approach, the Council considers that this has not wholly informed or been assessed within Chapter 9 of the ES [APP-061], the HRA [APP-275] or the recently submitted Statutory Biodiversity Net Gain (BNG) Metric [PDA-008] and the accompanying BNG Assessment Report [APP-273]. It is the Council's view that it would be inappropriate for the Draft DCO [APP-016] to be approved in its current form, even if this all-encompassing approach has been used for other NSIPs, and that the approach adopted in the preparation of Schedule 12 constitutes a misuse of the 'Rochdale Envelope' approach Government Guidance in the form of NSIPs – Advice Note Nine: Rochdale Envelope (Republished July 2018 (version 3)), which sets out criteria that Applicants opting to apply the 'Rochdale Envelope' approach should meet. It is considered that the DCO application has not wholly fulfilled and complied with the criteria or demonstrated a sound rationale for the	remit. As set out in ES Volume 1, Chapter 3: The Scheme [APP-055], the extent and purpose of the design flexibility sought have been clearly defined and follow the Planning Inspectorate's Advice Note Nine. In relation to ecology and biodiversity, the assessment presented in ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015] has been undertaken using precautionary worst-case assumptions, including the reasonably anticipated maximum extent of land take, infrastructure footprint and timescales of construction activities. The Applicant considers that the Rochdale Envelope has been applied in accordance with Planning Inspectorate Advice Note Nine and that the assessment presented in ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015] assesses the realistic worst-case effects on all ecological receptors. The approach to assessment for both ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015] and the Habitats Regulations Assessment Report	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		approach taken to the Draft DCO contents.	<u>(HRA) [APP-275] has been agreed with Natural England and therefore the Applicant is confident the approach taken is robust and appropriate.</u>	
3.5.3	Methodology for cumulative and in-combination effects	Wiltshire Council has consistently raised concern (including in emails) regarding the Zones of Influence (Zol) used for the assessment of cumulative and in-combination effects, and considers a larger Zol should have been applied, particularly due to likely presence of highly mobile species and the scale of the development proposals.	<u>The Applicant considers the study areas and Zol adopted are proportionate to the nature of the Scheme and reflect recognised practice for NSIP solar development. Mobile species and potential impact pathways have been given appropriate consideration. As set out within section 9.5 of ES Chapter 9: Ecology and Biodiversity [REP1-015], the Study Area for assessing potential effects of the Scheme on internationally designated sites is set at 10 km from the Solar PV Sites, although this has been extended to up to a maximum of 30 km for internationally designated sites with qualifying mobile species of migratory birds or bats, as individuals of these species groups can regularly travel distances of greater than 10 km when foraging or during seasonal movement. A reduced study area of a 500 m radius from the Cable Route</u>	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			Corridor has been applied to take account of the temporary and limited nature of works to take place in this element of the Scheme. As set out in ES Volume 1, Chapter 21: Cumulative and In-Combination Effects [APP-073] for the assessment of cumulative impacts on ecological features, a 10km Zone of Influence (Zol) from the Solar PV Sites (and 500m from the Cable Route Corridor for the same reasons as above, i.e. the temporary and limited nature of cable installation) has been applied within which other projects have been identified and considered for their potential to result in additional impacts and/or increase the magnitude of effect for impacts already identified as likely to result from the Scheme. There is no set distance in industry guidance for the size of Zols in the assessment of cumulative impacts. A 10km cumulative Zol (500m for the Cable Route Corridor) for ecological impacts is typically adopted as best practice for NSIP solar projects of a similar scale. This is because the	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			primary direct and indirect effects of such projects rarely extend beyond 10 km from the source of impact in measurable or ecologically significant ways. 10 km also captures typical maximum foraging distances for most species of wildlife, including highly mobile species such as species of bats, birds, and large mammals. Further, it is reasonable to assume that the ability to reliably assess potential cumulative impacts on specific ecological receptors diminishes proportionally to the distance between projects, due to decreasing ecological connectivity and increased heterogeneity of habitats, and ultimately weaker potential impact pathways between any two projects at increasingly larger distances. All development projects can be expected to follow the Environmental Impact Assessment process and mitigation hierarchy, with appropriate avoidance/mitigation measures implemented to make any impacts acceptable in order to be ably decided	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			by the relevant planning competent authority. With this in mind, the Applicant therefore considers that extending assessments beyond 10km is disproportionate to the actual risk of potential cumulative effects occurring. It is the Applicant's view that a 10km ZOI is considered to provide a balanced application of the precautionary principle, being broad enough to capture most relevant potential cumulative impacts without introducing speculative assessments and drawing in an excessive number of unrelated projects.	
3.5.4	Baseline methodology	Wiltshire Council consider that the desk study for the Cable Route Corridor (CRC) is inadequate, as it limits data collection to within the corridor itself and does not consider statutory or non-statutory designated sites beyond it. The desk methodology used in relation to the CRC is therefore a concern to the Council as it has not facilitated the identification of any international, national or local designated sites, HPI / priority habitats or ancient woodland	<u>The Applicant considers the desk study was scoped proportionately, having regard to the temporary nature of the works, the absence of permanent operational effects, and refinement of the construction working width to approximately 25 m (narrower at hedgerow breaches). Searches for designated sites and priority habitats were therefore focused within the CRC.</u> <u>A wider search for non-statutory designated sites was undertaken at</u>	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		beyond the CRC even though it extends the substantial distance of approximately 22km and will be up to approximately 665m in some locations and temporary construction compounds will be sited throughout the CRC. The approach to the desk study method for the CRC and the underpinning rationale presented in the above extract from 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 under-estimated. The Council considers that the perceived assumption that there will be no / limited pathways for impacts on ecological features and receptors beyond the construction footprint of the CRC to be incorrect. As such, the desk study methodology is considered inadequate particularly given that the applicant has opted to rely on the Rochdale Envelope approach and therefore a comprehensive ecological	<u>PEIR stage across the Cable Route Search Corridor, which covered a larger area than the CRC, and that information helped define the narrower corridor.</u> <u>Fixed 2 km and 1 km search radii are not automatically required in all circumstances; search areas should be informed by the zone of influence and the existence of credible impact pathways. Works within the CRC are temporary, contained and relatively low impact, and a low risk of pathways to designated sites, ancient woodland or priority habitats beyond the corridor was identified.</u> <u>The 500 m protected species search radius was defined on the same basis and was considered sufficient to identify populations for which construction-phase disturbance, temporary habitat loss or fragmentation could realistically occur. It differs from the wider search used at the Solar PV Sites, where long-term land-use change applies.</u>	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		baseline should be established to ensure that the realistic worst case effects of the CRC are assessed for all potential ecological receptors.	<u>Embedded mitigation and controls secured through the Outline CEMP [REP4-049] and Outline EPMS [REP4-055] provide further assurance that significant effects beyond the CRC will be avoided.</u> The desk study methodology for the CRC was defined using a proportionate approach, 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 to approximately 25 m (narrower at hedgerow breaches). On this basis, desk study searches for designated sites and Priority Habitats were focused on features within the CRC. 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	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			the PEIR, and this information was used to help define the narrower CRC. The Applicant does not agree that fixed 2 km and 1 km search radii for designated sites are automatically required in all circumstances but should be informed by the potential zone of influence of Scheme and the existence of credible impact pathways. For the CRC, works will occupy a smaller area than that covered by the Order Limits and will be temporary, contained and relatively low impact, and as such a low risk of impact pathways were identified for construction activities to give rise to likely significant effects on designated sites, ancient woodland or priority habitats beyond the CRC itself. The 500 m search radius for protected species applied to the CRC was similarly defined using a proportionate approach reflecting the short-term and temporary and nature of construction works and the absence of permanent operational effects. The approach differs from that applied to the Solar PV	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			Sites, where long-term land-use change warranted a wider search area. For the CRC, the 500-m search radius was considered sufficient to identify relevant protected and notable species populations for which construction-phase impacts, such as disturbance, temporary habitat loss or fragmentation, could realistically occur. Embedded mitigation and controls secured through the Outline CEMP [REP3-092EN010168/APP/7.12 (Rev 3)] and Outline EPMS [REP13-1062] provide further assurance that significant effects beyond the CRC will be avoided. The Applicant therefore considers that the desk study methodology for the CRC is proportionate and sufficient to support a robust assessment of likely significant effects.	
3.5.5	Baseline = <u>Habitats within the CRC</u>	Wiltshire Council does not agree with the content of the Applicant's Position Statement on this matter because habitat survey information and data for the entirety of the CRC was not	Habitat surveys have been undertaken across the entirety of the CRC, including at additional areas completed following the Council's statutory consultation response, and this data	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		included in the assessment presented in ES Chapter 9: Ecology and Biodiversity [APP-061] submitted with the DCO application and instead conclusions had been drawn from aerial imagery for 17 hectares within the CRC for which baseline information collated through habitat survey was omitted from the ES, the HRA and the Statutory Biodiversity Metric. Therefore, Wiltshire Council raised concerns regarding the evident gaps in baseline data. The Council has also consistently raised concern regarding the lack of any species/species group specific surveys within the CRC; notably bat survey within the section of the CRC that coincides with a greater horseshoe bat consultation zone around the Box Mine component of the Bath and Bradford-on-Avon Bats Special Area of Conservation (SAC) as collation of baseline data through dedicated Phase 2 survey would have informed the ES and the HRA thereby increasing the	has informed the assessment presented in ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-0154-010]. The Applicant considers the baseline conditions which are detailed in ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-0154-010] and ES Volume 3, Appendices 9-1: Ecological Baseline Report [REP1-0834-019] to 9-6: Water Vole Survey Report [APP-204] are representative of the baseline site conditions within the CRC.	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		robustness, accuracy and reliability of the assessments.		
3.5.6	Habitat Survey Methodology	Wiltshire Council has raised issue with the habitat survey methodology presented in Section 2.3 of ES Volume 3, Appendix 9-1: Ecological Baseline Report [APP-198] as it does not specify whether areas added following the June 2025 boundary amendments have been surveyed. It appears that the areas have been subsumed within the red line boundary of the Scheme and so clarity regarding whether these areas have been surveyed is required, especially in relation to Change Locations 7 and 10. The Council has raised the issue of the un-surveyed area within the CRC and highlighted that this is a concern for the Council as host authority. Although, it is stipulated in APP-198 that the precautionary principle has been applied, the absence of the associated ecological baseline data represents a significant omission and could give rise to inaccuracies in the ES and HRA.	The Applicant confirms that all of the fifteen areas subject to Targeted Consultation in June 2025 have been surveyed.- In relation to Change Locations 7 and 10 in particular, see the Applicant's response at 3.5.42. The Applicant acknowledges that some areas within the Cable Route Corridor had not been subject to ecological survey at the point of finalising the ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-0154-010]. Since the preparation of ES Volume 3, Appendix 9-1: Ecological Baseline Report [REP1-0834-019], habitat surveys have now been completed across all previously un-surveyed areas. The survey methodology applied was consistent with that reported in the ES Volume 3, Appendix 9-1: Ecological Baseline Report [REP1-0834-019] for the rest of the Cable Route Corridor	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		The Council notes the Applicant's intention to submit habitat survey information for the areas within the CRC for which baseline information based on field survey had been omitted within the DCO application at Deadline 1 and as such will need to review that updated information to be able to verify the issue has been addressed. <u>See also 3.5.5, 3.5.21 and 3.5.42.</u>	The results of these surveys have been reviewed and, in the Applicant's view, do not alter the conclusions of ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-0154-010] regarding likely significant effects. The precautionary assumptions previously applied in the ES were conservative and appropriately accounted for any uncertainty associated with un-surveyed areas. The Applicant has updated ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-0154-010] and provided a revised version at Deadline 1 with the findings of these surveys, and it is considered these do not materially change the assessment of likely significant effects presented in the chapter.	
3.5.7	Breeding Bird Survey Methodology	Wiltshire Council has raised concern that most survey zones haven't been subject to a complete season's worth of survey visits and that instead the methodology adopted has been to split the breeding bird survey across two years and that has potential	<u>The rationale for spreading visits over two years is given at paragraph 1.2.26 of ES Volume 3, Appendix 9-4: Breeding Bird Survey Report [APP-200]. The Applicant maintains it captures annual variation in habitat suitability arising from crop rotation on</u>	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		implications for the robustness of the territory analysis. The Council has also raised queries regarding why survey in the second year (2024) didn't start until 10-12th April. The Council considers it would have been preferable for a full suite of survey visits to have been conducted in 2024 even though June and July visits were undertaken in 2023, in order to have provided a complete dataset for 2024. Having reviewed Volume 3 Appendix 9-4: Breeding Bird Survey Report of the ES submitted as part of the DCO application, it is evident that although an explanation is provided in paragraphs 1.2.7 and 1.2.26 as to why the surveys were split across 2023 and 2024, the key issue hasn't been fully addressed as the reason why the decision was taken not to complete a full suite of survey visits in 2024 in order to provide a complete and robust dataset for that year has still not been provided. It is therefore assumed that the reason was due to cost and staff resources.	<u>predominantly arable land and identifies patterns of persistent use by key species.</u> <u>The Bird Survey Guidelines recommend six visits during the breeding season as proportionate effort but do not require all six to fall in the same calendar year.</u> <u>The Applicant acknowledges that the April start is not in strict accordance with the Bird Survey Guidelines. March activity is typically limited to early breeders such as thrushes, tits, pigeons and corvids. The species of interest are farmland ground-nesting birds – particularly skylark, and also yellow wagtail, quail and corn bunting – which typically nest from April onwards and were considered at greatest risk given that most impacts fall on in-field habitats. Species such as lapwing that may begin in March continue nesting into April and would still be captured. The absence of March data is not considered a significant limitation on the robustness of the data or the conclusions. The Applicant has</u>	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		No rationale is provided in Volume 3 Appendix 9-4: Breeding Bird Survey Report of the ES submitted as part of the DCO application, as to why surveys in the second year of survey (2024) didn't start until mid-April. Paragraph 1.2.11 of Appendix 9-4 states: "<i>The field methodology followed BTO Common Birds Census guidance (Ref 9-4-7) and Bird Survey Guidelines.</i>" Nonetheless, the BTO survey methodology cited recommends that surveys should generally commence in mid-March and as such, the cited methodology wasn't followed in this regard contrary to what is stipulated in paragraph 1.2.11 of Appendix 9-4 and no rationale is provided for the late start of surveys.	provided a rationale for spreading surveys visits over two years in paragraph 1.2.26 of ES Volume 3, Appendix 9-4: Breeding Bird Survey Report [APP-200], and maintains that doing so captures annual variations in breeding bird habitat suitability as result of crop rotation on predominantly arable land and allows for the identification of patterns/persistence of usage of the fields by key bird species. As a point of clarity, whilst the Bird Survey Guidelines (on which the survey scope was based) recommended six survey visits during the breeding season is proportionate survey effort, they do not stipulate that all six survey visits need to all be from the same calendar year. With reference to the position on the commencement of breeding bird surveys in April, the Applicant acknowledges this is not in strict accordance with the recommendations of the Bird Survey Guidelines. However breeding bird activity in March is typically limited to early breeding	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			species, such as thrushes, tits, pigeons, and corvids among others. For the Scheme, the breeding bird survey season took into consideration the context of the sites being predominantly arable and the main species of interest being farmland ground-nesting birds (particularly skylark), which were considered to be at greatest risk of being adversely impacted by the Scheme, due to most development impacting in-field habitats as opposed to field boundaries. Farmland ground-nesting bird species, such as skylark, yellow wagtail, quail, and corn bunting typically begin nesting later in the year (typically from April onwards). As such the timings of surveys were adapted to coincide with the start of the main breeding season for farmland ground-nesting birds. Even where some ground-nesting species, such as lapwing, may have already started to nest in March, they would continue nesting into April/ beyond, and so it is considered beginning the survey in April would capture the presence of any breeding activity/ territories. The	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			Applicant therefore considers the lack of march information is not a significant limitation to the robustness of the data or the conclusions of the assessment	
3.5.8	Baseline - Non-Statutory Designated Sites	Non-statutory nature conservation sites within 2 km of the solar PV sites are identified in the ES, but for the CRC, the desk study only considered the CRC itself with no search beyond the Order Limits. Wiltshire Council deems this inadequate because construction activities (e.g., light spill, dust, noise) could affect nearby non-statutory sites and the species. they support. A robust ecological baseline, informed by realistic worst-case pathways and application of the precautionary principle, is needed to facilitate comprehensive and robust assessment of the impacts, especially given the reliance on the Rochdale Envelope approach. It is considered therefore that this requirement has not been fully met. <u>See also 3.5.4</u>	<u>As set out at 3.5.4, the CRC desk study was scoped proportionately to the temporary nature of the works and the approximately 25 m working width.</u> <u>A wider search area for non-statutory designated sites is not considered essential given the short-term works and the lack of plausible impact pathways. Temporary compounds and associated lighting, dust deposition and noise are subject to embedded mitigation and controls secured through the Outline CEMP [REP4-049] and Outline EPMS [REP4-055], limiting effects beyond the immediate working area.</u> <u>The Rochdale Envelope has therefore been applied appropriately, with the CRC assessed on the basis of the maximum reasonable construction impact. The desk study methodology for the CRC was defined using a</u>	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			proportionate approach, 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 to approximately 25 m (narrower at hedgerow breaches). On this basis, desk study searches for designated sites and Priority Habitats were focused on features within the CRC. The Applicant does not agree that a wider search area for non-statutory designated sites is essential due to the short-term and temporary nature of works with the CRC and lack of plausible impact pathways. 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 [REP3-092EN010168/APP/7.12 (Rev 3)] and Outline EPMS [REP13-1026], limiting the potential for effects beyond the immediate working area. The Applicant therefore considers the Rochdale Envelope has been applied appropriately, with the CRC assessed	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			on the basis of the maximum reasonable construction impact.	
3.5.9	Baseline – <u>presentation of habitats</u>	It is considered that it is not made sufficiently clear in paragraphs 3.2.3 to 3.2.7 of ES Vol 3, 6.3 Appendix 9-1: Ecological Baseline Report [APP-198] that the information presented regarding the presence of priority habitats relates to what has been identified during the desk study only rather than data and information collated regarding HPI within the Order Limits during field survey. As a result, it gives the incorrect impression that other HPIs / priority habitats are not present within the Solar PV Sites and CRC. It is suggested that a suitable heading is included along the lines of 'Desk Study Results'. Wiltshire Council notes the Applicant's Position which states that this has been addressed within the version of ES Chapter 9 to be submitted at Deadline 1. This has not been reviewed by the Council at the time of writing and as	The Applicant notes this comment and acknowledges those priority habitats listed in those paragraphs relate to only priority habitats identified during the desk study. The text in ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-0154-010] has been updated to make this clear at Deadline 1. It is considered that this does not change the conclusions presented in ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-0154-010]. All HPI / Priority Habitats present within the CRC are reported within ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-0154-010].	Agreed

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		such, the Council will review the revised version of ES Chapter 9 upon publication and will then be in a position to verify whether this matter has been addressed. As of 6th July 2026 (comprising the second occasion the Council has input into the SoCG), the Council can verify that the iteration of ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015] has been updated accordingly.		
3.5.10	Baseline - Other Neutral Grassland – Solar PV Sites and CRC	Wiltshire Council notes that the ES identifies areas of other neutral grassland within the Solar PV Sites (notably in Fields E12, E18, E26 and C29), none of which are assessed as qualifying as priority habitat. Within the Cable Route Corridor (CRC), other neutral grassland covers approximately 15.44 ha (3.34% of the CRC) and is described as botanically diverse and a good example of the habitat type. The Council is concerned however, that no further detail regarding the species composition of the other neutral	The Applicant notes the Council's comment. With respect to the CRC, the applicant can confirm that no area of other neutral grassland habitat within the CRC constituted HPI / priority habitat. Any such habitats would have been recorded as such and mapped accordingly. The text in ES Volume 3, Appendix 9-1: Ecological Baseline Report [REP1-083] has been updated at Deadline 1 with further details and confirmation that no grassland within the CRC comprised HPI / priority habitat.	Agreed

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		grassland within the CRC or discussion in terms of whether any of the areas could qualify as HPI / priority habitat is provided. The Council considers that the omission of further detail and analysis of the other neutral grassland habitat within the CRC and whether any areas of this habitat could constitute HPI / priority habitat must be addressed to enable a suitably informed and robust assessment of the Scheme. Therefore, the Council is unable to corroborate the evaluation of this habitat type on the basis of the information provided within the DCO application. The Applicant's Position Statement, which specifies that Appendix 9-1 [APP-198] has been updated with further details and confirmation that no grassland within the CRC comprised HPI / priority habitat, is noted. Nonetheless, at the time of writing, the updated Appendix 9-1, to be submitted at Deadline 1, had not been reviewed by the Council and so cannot yet be corroborated.	<u>The Applicant confirms that no area of other neutral grassland within the CRC constitutes HPI / priority habitat; any such habitat would have been recorded and mapped as such. Appendix 9-1 [REP4-019] was updated at Deadline 1 to confirm this.</u> <u>Areas mapped as both 'other neutral grassland' and 'Habitat Assumed' on Figures 9-1-13 to 9-1-24 [REP1-036] had not been surveyed when those figures were prepared. They were assigned habitat types from satellite imagery, desk study analysis and surveyed habitats in the surrounding area, as described at paragraph 9.7.18 of ES Chapter 9 [REP4-010], using 'other neutral grassland' as the highest-value habitat likely to be present on a precautionary basis.</u> <u>All such areas have now been surveyed using the methodology reported for the rest of the corridor. None was considered to represent HPI; most were reassigned to arable land or modified grassland, both of lower intrinsic biodiversity value. ES Chapter</u>	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		Moreover, the Council wishes to highlight that this level of information should have been included within the original Appendix 9-1 submitted with the DCO application. The Council has highlighted that there are areas within the CRC mapped on the Baseline Habitats Maps for the CRC (Figures 9.1.13 – 9.1.24) as “Habitat Assumed”, presumably as these areas had not been accessed for the purposes of survey, and that there are “Habitat Assumed” areas within the CRC that are also mapped as “Other neutral grassland”. The Council deems it important that such areas are subject to survey and that the habitat and botanical composition and diversity are determined before approval is granted for the DCO application (should the Examining Authority ((ExA)) be minded to approve the application). This is because it is possible that some areas of assumed other neutral grassland within the CRC could in fact qualify as HPI / priority habitat if species-rich.	<u>9 and the relevant appendices have been updated and the findings do not materially change the assessment of likely significant effects.</u> <u>Botanical quadrat data from previously un-surveyed grassland is provided in the BNG Assessment Report (Rev 3) [REP3-085] at Deadline 3.</u> The Applicant confirms that areas mapped as both ‘other neutral grassland’ as well as ‘Habitat Assumed’ within ES Volume 3, Figures 9-1-13 to 9-1-24: Baseline Habitats Map – Cable Route Corridor [REP1-036] had not been surveyed at the time of preparation of the figures and ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]. These areas were assigned habitat types based on a review of satellite imagery, a desk study analysis and in the context of other habitats within the local area which had been surveyed at that point in time, as described in paragraph 9.7.18 of ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]. Taking these considerations into account, these areas were mapped as ‘other	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		The Council therefore recommends the Examining Authority reviews this with caution as the Council considers that the DCO application lacked adequate ecological baseline information and data for the CRC at the point of submission. Given that the applicant has indicated the intention to rely on the Rochdale Envelope approach, in light of the parameters specified within the DCO submission documentation for use of this approach and the need to apply the precautionary principle, the Council recommends that in the interim period, whilst surveys are pending or in the event that the DCO determination needs to proceed, the ExA should assume areas mapped as both “Other neutral grassland” and “Habitat Assumed” comprise grassland HPI / priority habitat. The Council notes that the Applicant has updated ES Chapter 9 (and relevant appendices) with the findings of surveys and this will be reviewed upon publication at Deadline 1.	neutral grassland', being the highest value habitat likely to be present on a precautionary basis. The Applicant confirms that all such areas have now been subject to survey. The survey methodology applied was consistent with that reported in the ES for the rest of the Cable Route Corridor. The Applicant can confirm that none of the areas were considered to represent HPI / Priority Habitat. Some habitat types were reassigned from the assumed habitat 'other neutral grassland' and in most cases were categorised as either arable land or 'modified grassland' both of which are habitat types of generally lower intrinsic value to biodiversity. The Applicant has updated ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015] (and relevant appendices) with the findings of these surveys, and it is considered these do not materially change the assessment of likely significant effects presented in ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015].	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		<u>As of 6th July 2026 (comprising the second occasion the Council has input into the SoCG), the Council can verify that the updated version of 7.8 Biodiversity Net Gain Assessment Report (Rev 3) [REP3-085] submitted at Deadline 3 includes quadrat data from previously un-surveyed grassland habitats and that Table A5 has been revised and Table A27 has been included.</u>		
3.5.11	Baseline – Ponds	The evaluation of the ponds within the solar PV sites and CRC presented in paragraph 3.2.77 of ES Vol 3, 6.3 Appendix 9-1: Ecological Baseline Report [APP-198] appraises this habitat as being of Local Importance. The evaluation does not specify that the ponds within the Order Limits likely qualify as HPI / priority habitat, despite the fact that in the legends of the Baseline Habitats Maps (Figures 9.1.8 – 9.1.12 and Figures 9.1.13 – 9.1.24) in ES, Vol 2, ponds are described as “Ponds (priority habitat)”. Wiltshire Council recognises the Applicant’s Position on this matter,	All ponds within the Order Limits have been assumed to represent HPI / priority habitat on a precautionary basis given the likely presence of toads and other amphibians. The rationale for this is set out in Table 9-7 of ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-0154-010] although it is acknowledged that it would be helpful to also set this out within ES Volume 3, Appendix 9-1: Ecological Baseline Report [REP1-0834-019] and this has been updated accordingly and at Deadline 1.	Agreed

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		however, this point is 'Under Discussion' until the updated ES Volume 3, Appendix 9-1: Ecological Baseline Report [APP-198] has been published at Deadline 1 and the Council has reviewed the updated iteration and can verify that the necessary amendments have been made to clarify this discrepancy. As of 6th July 2026 (comprising the second occasion the Council has input into the SoCG) Wiltshire Council confirms that the evaluation of ponds within ES Volume 3, Appendix 9-1: Ecological Baseline Report [REP1-083] submitted at Deadline 1 has been revised accordingly.		
3.5.12	Baseline - Hedgerows	Wiltshire Council has noted that the ES Volume 3, Appendix 9-1: Ecological Baseline Report [APP-198] stipulates that over 84km of hedgerow exists across the Solar PV Sites, over 66km of which were categorised as species-rich and a large proportion contained occasional semi-mature to mature trees and that the majority of hedgerows within the CRC are	<u>The Applicant considers that 'Importance' under the Hedgerow Regulations 1997 rests on landscape and heritage criteria as well as ecological value, and so was not discussed in the ecological assessment presented in ES Chapter 9 [REP4-010]. All important hedgerows are</u>	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		species-rich and form a network of connective linear features within the landscape. As such, the ecological importance of the hedgerow network and the fact that in general hedgerows comprise a HPI / priority habitat, is recognised in the evaluation. However, the evaluation in Volume 3, Appendix 9-1 and ES Chapter 99 omits discussion regarding the extent of hedgerow that meets the criteria of “important hedgerows” under the Hedgerow Regulations 1997. This point was also previously raised in the Council’s statutory consultation response. Furthermore, this information is evidently available to the Applicant as Schedule 12 of the Draft DCO lists important hedgerows within the Order Limits and their associated lengths; and the legends to the Baseline Habitats Maps (Figures 9.1.8 – 9.1.12 and Figures 9.1.13 – 9.1.24) list various categories of native species-rich hedgerows. As such, the Council considers there should be consistency	<u>mapped on the TPO and Hedgerow Plan [APP-011].</u> <u>Chapter 9 [REP4-010] evaluated hedgerows on their intrinsic biodiversity value – for example as wildlife corridors and shelter and foraging resource – consistent with all other habitat types and with the methodology at paragraphs 9.6.19 to 9.6.22.</u> The Applicant notes the Council’s comment. An explicit discussion on the extent to which ‘important hedgerows’ (as defined under the Hedgerow Regulations 1997) will be impacted by the Scheme was not included within the ecological assessment contained within ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]. This is in part because the ‘importance’ or otherwise of hedgerows in the context of the Hedgerow Regulations 1997 is not solely based on their ecological value, but also on account of landscape and heritage considerations. All important hedgerows are mapped and shown on the TPO and Hedgerow Plan [APP-	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		across the documents and plans submitted as part of the DCO Application and that the important hedgerows should have been identified and assessed in the ES, Chapter 9. The Council acknowledges the Applicant's Position Statement on this matter and is aware that important hedgerows are shown on the TPO and Hedgerow Plan [APP-011] but maintains its stance. The updated text in ES Chapter 9 will be reviewed by the Council when this is submitted, which presumably will be at Deadline 1. This had not been published at the time of writing.	011]. The assessment of hedgerows within ES Volume 1, Chapter 9 Ecology and Biodiversity [REP1-015] was instead based on their intrinsic value to biodiversity (such as their value as wildlife corridors and shelter/foraging resources for a range of protected / notable species). This is in line with the evaluation of all other habitat types present within the Order Limits and in accordance with the methodology described for the evaluation of Ecological Importance in paragraphs 9.6.19 to 9.6.22 of ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]. Nevertheless, the text in ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015] has been updated to provide further information relating to the extent of important hedgerows.	
3.5.13	Baseline – Badger	Wiltshire Council notes that the Applicant's ecological consultant has recorded 25 badger setts of varying status and levels of activity have been recorded within Lime Down Sites A-E, along with a number of field signs., and	ES Volume 2, Appendix 9-2: Badger Survey Report [APP-199] and ES Volume 2, Appendix 9-8: Schedule of Protective Ecological Buffers [APP-205] as well as corresponding ES Volume 2, Figure 9-2-1 to 9-2-5:	Agreed

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		that a total of eight badger setts have been identified within the Cable Route Corridor, including two main setts. Nevertheless, given that species-specific survey has not been conducted within the Cable Route Corridor it is possible that other setts may be present that were not detected during the habitat surveys. There will also be a need for update surveys to be conducted prior to commencement of construction (assuming the ExA grants approval) in case any new setts are constructed in the intervening period.	Badger Setts - Solar PV Sites [APP-115] and ES Volume 2, Figure 9-2-6 to 9-2-10: Badger Setts - Cable Route Corridor [APP-116] provide information of the locations of badger setts and activity. These are confidential at the instruction of PINS due to containing sensitive information relating to species at risk of persecution. It is the Applicant's view that the assessment of effects on badgers provided within ES Volume 1, Chapter 9: Ecology and Biodiversity [REP4-0154-010] is acceptable. Furthermore, it is the Applicant's view that the badger surveys undertaken at the Solar PV Sites and Cable Route Corridor (as outlined on Appendix 9-2: Badger Survey Report [APP-199]) are appropriate for determining the presence of setts and field signs, and followed standard good practice for badger walkover surveys. The Applicant therefore considers this matter to be agreed.	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
3.5.14	Baseline – Roosting Bats	Wiltshire Council considers it would have been prudent for the Bechstein's bat core maternity roosts to the south of Chippenham to have been included in paragraph 3.3.15 of ES Volume 3, Appendix 9-1: Ecological Baseline Report (APP-198) as these roosts are located within 2km of the Cable Route Corridor. Moreover, the Council provided a Technical Note regarding these roosts on 2 October 2024, well in advance of the DCO application being submitted. The Council's view is that although buildings are likely to be retained within the Scheme layout, there could be indirect disturbance to any bats using the buildings as roost sites during the construction phase and that as such, further survey of buildings with identified potential roost features (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	The precise location of the Bechstein's bat core maternity roosts south of Chippenham have not been disclosed to the Applicant, although the approximate location was provided and this has been noted in paragraph 9.7.15 of ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-0154-010] and in paragraph 1.3.8 of ES Volume 3, Appendix 9-3: Bat Survey Report [APP-200]. It is the Applicant's view that the ecological assessment undertaken within ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-0154-010] has fully considered the presence of these roosts and their location relative to the Order Limits. <u>Following the Council's comments on the PEIR, the roosting bat assemblage was re-evaluated and increased to District Importance on a precautionary basis, reflecting the number of trees with roost potential and the seasonal roosting opportunities identified.</u> <u>Paragraphs 9.10.170 to 9.10.180 of ES Chapter 9 set out that all buildings will</u>	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		potential for impacts on bats. It would have also strengthened the ES and HRA and would have been particularly useful within the section of the Cable Route Corridor that coincides with a greater horseshoe bat consultation zone around a component of the Bath and Bradford-on-Avon Bats SAC and would have provided data to inform the HRA, thereby increasing its robustness and reliability. This matter has been raised previously within Wiltshire Council's statutory consultation response. <u>See also 3.5.23.</u>	<u>be retained and protected throughout all phases, and no significant impacts are predicted on any bats roosting within them. It is the Applicant's view that further survey to determine presence or likely absence in buildings is therefore considered unnecessary.</u> The Applicant agreed with the Council's previous statutory consultation comments that the roosting bat assemblage was potentially undervalued within the PEIR, particularly given the high number of trees within the Order Limits with potential to support roosting bats. As such the evaluation of roosting bats was reassessed and an increased valuation of District Importance was considered appropriate within ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015] applying the precautionary principle. This was based on professional judgement with consideration to the likely assemblage of bats present (as determined through the described desk study and field surveys) and the opportunities identified for meeting seasonal roosting	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			needs (for instance breeding, mating, hibernating and feeding). A comprehensive assessment of potential impacts on roosting bats potentially using buildings has been made with the ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015]. Paragraphs 9.10.170 to 9.10.180 described how all buildings will be retained and protected from impacts throughout all phases of the Scheme, and it remains the Applicant's view that no significant impacts will occur should any bats be roosting within the buildings, as buildings, as per the conclusions of the assessment. As such it is the Applicant's view also that further surveys to determine the presence or likely absence of bats using the buildings is considered to be unnecessary.	
3.5.15	Baseline Foraging / Commuting Bats	Foraging / Commuting Bats – Solar PV Sites: In its statutory consultation response, Wiltshire Council had raised concern regarding the loss of a significant area	The rationale for not undertaking manual transect surveys is set out in paragraphs 1.2.16 to 1.2.19 of ES Volume 3, Appendix 9-3: Bat Survey Report [APP-200], and in the	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		of permanent pasture across the Order Limits and that the associated potential for adverse effects on bats, especially loss of foraging resource for greater horseshoe bats, had been underestimated. It is acknowledged that the DCO application proposes a reduction in the area of permanent pasture projected to be lost compared to that which was estimated in the PEIR. Nonetheless, the Council remains concerned about the total reliance on static detector surveys across the Solar PV Sites and the potential implications for the assessment. The Council had recommended manual transect surveys in key bat habitats within the Solar PV Sites to supplement static detectors. These surveys have not carried out. Instead, the Applicant provided a rationale setting out it was considered that manual transects were deemed unnecessary, despite Bat Conservation Trust (BCT) survey guidelines.	Applicant's view the survey effort is considered appropriate. The Applicant maintains that, due to the short-term and temporary and temporary nature of works within the CRC, the relatively localised construction footprint (i.e. 25m typical width of the cable works plus temporary construction compounds) and the absence of permanent operational effects, an adequate assessment of impacts on foraging / commuting bats has been made based on the appraisal of habitats undertaken. It is the Applicants view that potential impacts within the CRC, including temporary habitat loss, disturbance and fragmentation, have been assessed on a precautionary and reasonable worst-case basis, and that the mitigation measures to be secured as part of DCO requirements are appropriate for ensuring no significant residual adverse impacts will occur in line with the conclusions of ES Volume 1, Chapter 9 Ecology and Biodiversity [REP1-0154-010].	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		Foraging / Commuting Bats – Cable Route Corridor: No bat activity surveys were conducted within the Cable Route Corridor (CRC). The Applicant assumed the CRC habitats are similar in value and species composition to the Solar PV Sites and argued that temporary habitat removal would be short-term and reinstated, so surveys were unnecessary. The Council raised concern regarding the lack of bat activity survey within the CRC within its previous statutory consultation response. The Council recognises it would have been potentially unfeasible and possibly unnecessary to undertake bat activity surveys across the entire Cable Route Corridor, but expected some survey to have been undertaken in locations where impacts are likely to be greatest, such as in the vicinity of temporary construction compound sites and areas that coincide with the Bath and Bradford-on-Avon Bats SAC greater horseshoe bat consultation zone, and		

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		near the Bechstein's bat core maternity roosts south of Chippenham, particularly in cattle-grazed pasture. It is the Council's view that there should have been some bat activity survey conducted within the CRC to facilitate the impact assessment and HRA and to inform the formulation of adequate and appropriate avoidance and mitigation measures. The rationale provided by the Applicant as to why no survey has been undertaken at any location within the CRC, despite the potential for impacts on Annex II bats associated with the Bath and Bradford-on-Avon Bats SAC, is not deemed to be wholly sound or sufficiently precautionary. Furthermore, it is assumed that there had been opportunity in 2025 to carry out the targeted survey recommended in the Council's statutory consultation response. Therefore, the Council does not agree with or corroborate the Applicant's position statement on this matter. The precautionary approach is		

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		endorsed for the Bechstein's bat roosts assumed to be linked to the SAC.		
3.5.16	Baseline - Otter and Water Vole – Solar PV Sites and CRC	The Council's statutory consultation response raised concern that species-specific surveys for otters and water voles had not been conducted within the Cable Route Corridor (CRC). It is apparent from the DCO application that species-specific survey for otter and water vole has still not been conducted within the CRC. This is deemed inadequate and it is considered that a suitably robust rationale for the lack of these surveys has not been provided. This is particularly pertinent given that the applicant has opted to rely on the Rochdale Envelope approach.	The Applicant considers that a precautionary and reasonable worst-case scenario has been assumed for the assessment of impacts within ES Volume 1, Chapter 9 Ecology and Biodiversity [REP1-0154-010] , whereby both species have been assumed to be present in all suitable habitat, based on a comprehensive habitat appraisal. It is the Applicant's view that proposed embedded mitigation (such as adoption of trenchless technologies to avoiding impacting watercourses) or additional mitigation in the form of pre-construction surveys, micro-siting of works within the cable route corridor etc. to be secured by the Outline EPMS [REP3-102] , are entirely adequate for ensuring no significant residual impacts would occur in line with the conclusions of the assessment provided in ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-0154-010] .	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
3.5.17	Baseline - Great Crested Newt – Solar PV Sites and CRC	Confirmation that the Applicant intends to use Natural England's GCN District Level Licensing Scheme (DLL) in respect of the CRC is acknowledged and welcomed as this clarification had not been provided within the PEIR and as such, the Council's statutory consultation response had queried this point. Nevertheless, the required Impact Assessment and Conservation Payment Certificate (IACPC) from Natural England should have been obtained by the Applicant and submitted with the DCO application. ES Chapter 9 specifies that there is intention to apply to use the DLL but it does not stipulate that an application for a IACPC has been submitted to date. The omission of the necessary IACPC in support of the DCO application is considered an important issue for the reasons detailed in the Council's Relevant Representation (January 2026). A copy of the IACPC was emailed to Wiltshire Council on 6 May 2026. There	The Applicant confirms that an IACPC countersigned by Natural England has been obtained and will be submitted as evidence of the Schemes acceptance into the District Level Licensing Scheme. The IACPC contains an 'Impacts Plan' corresponding with the Cable Route Corridor elements of the Order Limits. The assessment of effects on great crested newts is considered to be acceptable. <u>An IACPC countersigned by Natural England has been obtained and will be submitted as evidence of acceptance into the DLL scheme. It contains an Impacts Plan corresponding to the CRC elements of the Order Limits. The assessment of effects on great crested newt is considered acceptable.</u> <u>On pond numbers: for a predominantly temporary scheme, Natural England excludes from the DLL site boundary ponds that will not be directly impacted, and that boundary is not contiguous with the Order Limits. Conversely, all ponds within 250 m of the CRC are</u>	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		are a couple of discrepancies noted in the IACPC. Firstly, Section 2.1 states there are no ponds within the proposed site boundary (which for the purposes of the IACPC is the CRC) and Section 2.2 states that the total number of ponds within 250m buffer around the proposed site boundary is 150, whereas paragraph 3.3.59 of ES Volume 3, Appendix 9-1: Ecological Baseline Report [APP-198] stipulates that approximately 130 waterbodies were identified within the CRC and surrounding 250m. Secondly, Section 3.1 of the IACPC indicates that the DLL enquiry has been submitted with survey information, (which means Habitat Suitability Index ((HSI)) information, presence/absence survey data, population class (if GCN present). This has implications for how the remainder of the form has been completed and what has been agreed with Natural England (NE). However, the DCO application has not been accompanied by any such GCN survey information pertaining to the CRC and instead	<u>captured for DLL purposes regardless of their association with other Scheme elements, whereas paragraph 3.3.59 of Appendix 9-1 [REP4-019] excludes ponds associated with the Solar PV Sites, which are described separately. This accounts for the difference.</u> <u>The survey information provided to Natural England in support of the DLL enquiry comprised the presence/absence surveys of ponds at the Solar PV Sites reported in Appendix 9-5: Great Crested Newt Survey [APP-202].</u> <u>For the Solar PV Sites, the key embedded mitigation is protective buffer zones (paragraph 9.10.237 of Chapter 9 [REP4-010]): all ponds are retained regardless of GCN presence within a minimum 10 m undeveloped buffer, increasing to a minimum 50 m where GCN are confirmed or, for unsurveyed off-site ponds, assumed present. The most suitable terrestrial habitats – hedgerows, ditches, woodland and field margins – are also retained and buffered (paragraph</u>	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		indicates there has been no species-specific survey in respect of the CRC. Given that Annex 3 to the IACPC provides figures which relate to the entire Order Limits rather than just the boundary of the CRC to which the application to use DLL applies, it is assumed that GCN survey information for the Solar PV Sites was submitted to the NE with the DLL application and that this accounts for why it has been stated in the IACPC that survey information has been provided. Clarification on this matter should be sought. The Council notes that presence of GCN has been confirmed 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. However, as detailed in the Council's Written Representation, ES Chapter 9 does not discuss what decision was taken in respect of the proposed mitigation strategy for the Solar PV Sites and the potential need for acquisition of a GCN mitigation licence(s) to allow the works to legally	<u>9.10.236), with buffer protection detailed in the Outline EPMS [REP3-102].</u> <u>Chapter 9 acknowledges that buffers alone are unlikely to avoid all impacts, as individual newts can occur beyond 50 m of breeding ponds. Additional measures at paragraph 9.12.26 therefore apply outside buffer zones: sensitive timing of vegetation removal, EcoCoW attendance at specified activities, and measures to prevent stored materials becoming sheltering features. These are detailed in the Outline EPMS and secured by DCO requirement.</u> <u>Given that the Solar PV Sites comprise largely suboptimal arable and agricultural grassland and that only 2 of 24 ponds supported GCN, no mitigation licence is currently intended for the Solar PV Sites. This is consistent with the approach on comparable consented solar DCOs, such as West Burton Solar Farm (EN010132). The Applicant notes the discrepancies in terms of numbers of</u>	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		proceed, how the decision was reached and what the justification for the determined approach comprises. It is the Council's view that if the decision has been taken to rely on the precautionary working methods detailed in Chapter 9 and the Outline EPMS [APP-284], then this should have been stated clearly in the ES Chapter 9 together with a robust rationale to demonstrate that it is appropriate, sufficient and would be legally compliant. Supporting evidence could have comprised use of Natural England's GCN rapid risk assessment tool in the GCN Mitigation Licence Method Statement template. The Council recommends the ExA requests further information regarding the proposed GCN mitigation strategy for the Solar PV Sites, as well as further supporting evidence and a sound justification if the Applicant has opted not to apply for any type of GCN mitigation licence given the scale of the Scheme, the potential for adverse effects and the level of protection afforded to GCN, which utilise both	ponds. For the purposes of the DLL process, for a predominantly temporary scheme (of which the Cable Route Corridor is considered to be), where ponds will not be directly impacted they are excluded from the DLL 'site boundary' by Natural England. The site boundary is not contiguous with the Order Limits in this case and as no ponds will be lost as part of the Scheme, they are removed from the DLL 'site boundary'. A number of ponds associated with the Solar PV Sites are also present within 250 m of the of the Cable Route Corridor. As a point of clarity, paragraph 3.3.59 of ES Volume 3, Appendix 9-1: Ecological Baseline Report [REP1-083] refers to ponds within 250m of the Cable Route Corridor, excluding those ponds associated with the Solar PV Sites which are separately described. However, for the purposes of the DLL, all ponds within 250 m of the Cable Route Corridor are considered as part of the impact assessment regardless of their location relative to other elements	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		aquatic and terrestrial habitat within the Solar PV Sites.	of the Scheme. As a result, more ponds are captured in the IACPG than have been described as being associated with the Cable Route Corridor in ES Volume 3, Appendix 9-1: Ecological Baseline Report [REP1-083]. The Applicant confirms that survey information submitted to Natural England in support of the DLL enquiry comprised the GCN presence / absence surveys of ponds at the Solar PV Sites as detailed in ES Volume 3, Appendix 9-5: Great Crested Newt Survey [APP-202]. With reference to the mitigation strategy for the Solar PV Sites, Paragraph 9.10.237 of ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015] sets out how a key embedded mitigation measure designed to avoid impacts on great crested newts during the construction phase are the implementation of protective buffer zones. All ponds at the Solar PV Sites will be retained regardless of presence of	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			great crested newts, and protected within a minimum 10 m undeveloped buffer zone. Ponds with confirmed great crested newt presence, or any off-site ponds where it has not been possible to survey (and thus GCN presence has been assumed on a precautionary basis) will be protected with a minimum 50 m undeveloped buffer zone. Paragraph 9.10.236 of ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015] also sets out how the most suitable terrestrial habitats at the Solar PV Sites (such as hedgerows, ditches, woodlands and field margin habitats) will be retained and protected with adequate buffers. The protection of these buffer zones is detailed within the Outline EPMS [REP31-1062]. However, ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015] acknowledges that impacts on great crested newts are unlikely to be avoided alone through the implementation of buffer zones. Although 50 m around breeding	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			ponds represents the core habitat for great crested newts, individual newts can be found beyond this distance particularly where suitable habitat is present. Paragraph 9.12.26 of ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015] describes how additional mitigation measures will be adopted to minimise impacts on great crested newts which could be present outside of protected buffer zones. Such measures include the sensitive timing of certain vegetation removal works, activities requiring the attendance of an Ecological Clerk of Works (EcoCoW), and measures to prevent stored materials becoming attractive sheltering features. Such measures are designed to avoid killing/injury and disturbance to individual newts outside of protected buffer areas. These measures are detailed within the Outline EPMS [REP31-1026] and will be secured by DCO requirement.	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			It is the Applicant's view that impact avoidance and reduction measures described are appropriate and sufficient for avoiding impacts on individual newts when considering relatively suboptimal habitat comprises the vast majority of the Solar PV Sites (namely arable fields and agricultural grassland), and the relatively low density of ponds found to support great crested newts (2 of 24 ponds at the Solar PV Sites were found to support great crested newts during surveys). As such it is not currently intended to acquire a great crested newt mitigation licence for the Solar PV Sites due to the low likelihood of impacts. This is in accordance with the approach adopted for other similar solar DCO schemes, such as the approved West Burton Solar Farm (EN010132).	
3.5.18	Baseline – breeding birds	Barn owls were recorded as possibly breeding across Solar PV Sites Lime Down A–E. Given the evidence, the Council would have expected species-specific survey for this Schedule 1	<u>All buildings within the Order Limits will be retained and protected, with no direct impacts. Pre-construction barn owl inspections of buildings that may be subject to indirect impacts such as</u>	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		species to have at least been carried out at the buildings within the Solar PV Sites. While Solar PV Sites support various breeding birds, no surveys were conducted within the Cable Route Corridor (CRC), with the justification that habitats would mostly be retained and temporary impacts reinstated. Given the CRC's scale, construction duration and methods, and temporary compounds, the Council would have expected breeding bird survey to have at least been undertaken at likely key habitats within the CRC. The rationale is deemed insufficient and does not fully recognise the potential for disturbance and displacement during the breeding season. The breeding bird assemblage at the Solar PV Sites and the CRC has been assessed as of District importance, however, this has been concluded without any breeding bird survey data having been collated for the CRC.	<u>noise disturbance are secured by section 5.3 of the Outline EPMS [REP4-055], which provides for altering works – for example delaying until nesting is complete – to avoid impacts and ensure legal compliance.</u> <u>A precautionary, reasonable worst-case scenario has been assumed for breeding birds within the CRC in ES Chapter 9 [REP4-010], given the short-term and temporary nature of those works.</u> <u>The assemblage was evaluated on professional judgement, informed by the desk study, the detailed surveys at the Solar PV Sites and the similarity of habitats between the two areas.</u>The Applicant notes that all buildings within the Order Limits will be retained and protected from development with no direct impacts. Pre-construction inspections for barn owls of any buildings within the Order Limits which may be subject to indirect impacts (such as noise disturbance) will be undertaken as secured within section 5.3 of the Outline EPMS [REP31-	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			1062]. As set out in section 5.3 of the Outline EPMS, this will identify potential requirements for altering works (for instance to delay works until nesting is complete) to avoid impacts and ensure legal compliance. The Applicant considers that a precautionary and reasonable worst-case scenario has been assumed for the assessment of impacts for breeding birds pertaining to the CRC within ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015], given the short term and temporary nature of the works associated with this element of the Scheme. The evaluation of the breeding bird assemblage with respect to the CRC was based on professional judgement with consideration to the likely assemblage of birds given the findings of the desk study and detailed surveys conducted at the Solar PV Sites, and the recorded habitats present (particularly the similarity of habitats within the both the CRC and the Solar PV Sites). It is the Applicant's view that	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			a suitably precautionary approach to the evaluation of the breeding bird assemblage within the Order Limits has been made.	
3.5.19	Baseline – overwintering birds	Although wintering bird surveys were undertaken at the Solar PV Sites, no wintering bird surveys have been undertaken within the CRC and the DCO application assumes that the habitats within the CRC are of similar value for overwintering birds as those at the Solar PV Sites. Taking this approach could omit the recording of further protected wintering bird species, Birds of Conservation Concern (BoCC) and / or species of principal importance (SPI) and is therefore not supported by Wiltshire Council.	The evaluation of the overwintering bird assemblage with respect to the CRC was based on professional judgement with consideration to the likely assemblage of birds given the findings of the desk study and detailed surveys conducted at the Solar PV Sites, and the recorded habitats present (particularly the similarity of habitats within the both the CRC and the Solar PV Sites). It is the Applicant's view that a suitably precautionary approach to the evaluation of the overwintering bird assemblage within the Order Limits has been made.	Under Discussion
3.5.20	Baseline White-Clawed Crayfish – Solar PV Sites and CRC	The Council highlights in its Relevant Representation (January 2025) that there has been no specific survey undertaken for white-clawed crayfish within either the Solar PV Sites or the CRC despite suitable habitat for white-clawed crayfish being present in the	The Applicant welcomes the Council's agreement of the evaluation ascribed to white-clawed crayfish.	Agreed

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		form of Gauze Brook and Gabriel's Well watercourses in Lime Down D and E, as well as a small number of wet ditches directly connected to these watercourses, and that the species has therefore been assumed present within all suitable habitat. In the Council's statutory consultation response, it was suggested that given that white-clawed crayfish are assumed to be present, the species should be assigned an ecological importance of greater than 'Local (assumed)'. The Council recognises that this evaluation has reassessed in the DCO application and that populations of white-clawed crayfish within the Order Limits are now considered to be of District Importance. This re-evaluation is welcomed and the Council concurs with the valuation in the absence of dedicated survey having been conducted. It should be noted, however, that the Council at no point has agreed that the lack of survey is acceptable and has as aforementioned, highlighted this omission. Instead, the Council has		

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		solely corroborated the requested re-evaluation in the absence of survey.		
3.5.21	HRA	As stated in its Relevant Representation (January 2026), the Council remains concerned regarding the total lack of bat survey within the CRC, 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. The Council expressed concern in its Relevant Representation regarding the approximate 17ha of the CRC hadn't been surveyed and regarding the extent of hedgerow would be removed through the securing of the Draft DCO. The precautionary principle should be applied and as such, it should be assumed that these gaps in the ecological baseline data and information could have implications for the HRA. Accordingly, the Council refrained from providing a view on the conclusions of the HRA at that stage and awaits the provision of habitat survey information for the currently un-surveyed area of the CRC.	The Applicant acknowledges that some areas within the Cable Route Corridor had not been subject to ecological survey at the point of finalising the HRA Report [APP-275] <u>for the original DCO submission. Those surveys are now complete, as set out at 3.5.6, and the results do not alter the conclusions of the HRA Report [REP3-090].</u> Habitat surveys have now been completed across all previously un-surveyed areas. The survey methodology applied was consistent with that reported in the ES Volume 3, Appendix 9-1: Ecological Baseline Report [REP1-083] for the rest of the Cable Route Corridor. The results of these surveys have been reviewed and, in the Applicant's view, do not alter the conclusions of HRA Report [APP-275]. A reasonable estimate of calculated permanent and temporary hedgerow removal requirements is set out in ES	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		The Council raises a number of issues and points regarding the HRA in its Written Representation (submitted at Deadline 1) which should be read alongside this SoCG and will not be repeated in full herein. It is considered that it is not evident that the HRA has been wholly based on the worst-case scenario as is required when relying on the Rochdale Envelope approach. In terms of mitigation measures discussed within the HRA to minimise impacts to functionally linked land (FLL) within the CRC where it coincides with the 4km greater horseshoe bat consultation zone around a component area of the Bath and Bradford-on-Avon Bats SAC, it needs to be borne in mind that the 10m maximum extents of hedgerow removal proposed, comprise the amount of removal that would be undertaken at a number of discrete locations. Also, although the Outline EPMS [APP-284] states that a maximum of 10m of hedgerow will be removed within the CRC where it coincides with the bat	Volume 1, Chapter 9 :Ecology and Biodiversity [REP1-0154-010] (e.g. paragraph 9.10.1380) and shown on a plan within the Outline EPMS [REP34-40552]. The Applicant acknowledges the final extent of permanent and temporary hedgerow removal cannot be determined until the detailed design stage. The estimates provided are however considered a reasonable precautionary, and likely worst-case scenario have been used to inform the assessment contained within the HRA Report [REP3-090]. The Applicant has updated ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015] and ES Volume 3, Appendix 9-1: Ecological Baseline Report [REP1-083] with the findings of these surveys, and it is considered these do not materially change the assessment of likely significant effects presented in the chapter. The Applicant has consulted Natural England on both the HRA process and the HRA Report [REP3-090] itself and	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		SAC consultation zone, this minimum distance isn't stipulated or shown on the relevant sheets of the Hedgerow Removal Plans (Sheets 40-45) or in the associated legends. This leads to a lack of certainty, assurance and consistency across the submitted documents and plans. Furthermore, the stipulation that hedgerow removal within the bat SAC consultation zone will be restricted to 10m has been omitted from the relevant rows of Schedule 12, namely the rows for the hedgerows that are shown on Sheets 40 to 45 of the Hedgerow Removal Plans. The Council maintains its stance that targeted bat survey within the section of the CRC that coincides with the bat SAC consultation zone should have been conducted to ensure the HRA and ES were informed by comprehensive baseline information and to provide confidence that the mitigation proposed is in fact sufficient and appropriate.	will continue to consult Natural England on HRA matters during the examination period.	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
3.5.22	Assessment Results	The Council considers that ecological impacts, particularly during construction within the cable route corridor, are consistently underestimated. with an over-reliance on impacts within the CRC being categorised primarily as temporary.	The Applicant considers the assessment results set out within ES Volume 1, Chapter 79: Ecology and Biodiversity [REP4-0104-015], including likely significant effects anticipated, are acceptable. In particular, the Applicant considers the assessment in relation to the Cable Route Corridor has been undertaken applying a proportionate and precautionary approach that reflects the realistic worst-case construction scenario within the Rochdale Envelope. The assessment is based on the maximum reasonable construction footprint, duration and severity of works, and considers receptors for which there is a plausible pathway for impacts. The Applicant does not agree assessment has resulted in an under-estimation of effects. The baseline information is considered sufficient to support a robust and proportionate assessment of likely significant effects within the Cable Route Corridor, and the conclusions of ES Volume 1, Chapter 9: Ecology and Biodiversity	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			[REP4-0101-015] remain appropriate and justified.	
3.5.23	Potential impact on Bechstein's bats	Wiltshire Council noted that paragraph 3.3.15 of the ES Volume 3, Appendix 9-1: Ecological Baseline Report [APP-198] lists bat roost records within 2 km of the Compensatory Receptor Sites (CRC) obtained through a desk study. They recommend that the Bechstein's bat core maternity roosts located to the south of Chippenham, for which the council's ecology team provided a Technical Briefing Note (2 October 2024),) also be included in paragraph 3.3.15, as these roosts are situated within 2 km of the CRC. The council expressed concern regarding the absence of bat activity surveys conducted in the CRC. Wiltshire Council acknowledged the precautionary approach outlined in paragraph 1.3.24 of the ES Volume 3, Appendix 9-3 Bat Survey Report [APP-200] concerning the Bechstein's bat core maternity roosts near Lackham, south of Chippenham. These roosts	<u>As set out at 3.5.14, the approximate roost location has been noted at paragraph 9.7.15 of ES Chapter 9 [REP4-010] and paragraph 1.3.8 of Appendix 9-3 [APP-200], and has been fully considered in the assessment.</u> <u>Bat activity survey within the CRC is not considered essential. Given the short-term and temporary works, the localised footprint (approximately 25 m plus temporary compounds) and the absence of permanent operational effects, impacts including temporary habitat loss, disturbance and fragmentation have been assessed on a precautionary, reasonable worst-case basis from the habitat appraisal undertaken. The mitigation secured by DCO requirement is appropriate to ensure no significant residual adverse impacts on Bechstein's bats. The precise location of the Bechstein's bat core maternity roosts south of Chippenham have not been disclosed</u>	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		have been assumed to be functionally and demographically linked to the Bath and Bradford-on-Avon Bats Special Area of Conservation (SAC).) in accordance with the Technical Briefing Note provided by the Council (2 October 2024). <u>See also 3.5.14 and 3.5.15.</u>	to the Applicant, although the approximate location was provided and this has been noted in paragraph 9.7.15 of ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015] and in paragraph 1.3.8 of ES Volume 3, Appendix 9-3: Bat Survey Report [APP-200]. It is the Applicant's view that the ecological assessment undertaken within ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015] has fully considered the presence of these roosts and their location relative to the Order Limits. The Applicant considers that, due to the short term and temporary and temporary nature of works within the CRC, the relatively localised construction footprint (i.e. 25m typical width of the cable works plus temporary construction compounds) and the absence of permanent operational effects, an adequate assessment of impacts on foraging / commuting bats has been made based on the appraisal of habitats undertaken. It is the Applicants view that bat activity survey with the CRC	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			are not essential, and potential impacts within the CRC, including temporary habitat loss, disturbance and fragmentation, have been assessed on a precautionary and reasonable worst-case basis, and that the mitigation measures to be secured as part of DCO requirements are appropriate for ensuring no significant residual adverse impacts will occur on Bechstein's bats in line with the conclusions of ES Volume 1, Chapter 9 Ecology and Biodiversity [REP1-015].	
3.5.24	Mitigation	There is an inconsistency in the ES regarding embedded ecological mitigation within the Cable Route Corridor: while buffers from field boundary habitats are proposed (stating these will not contain any array structures, hard standing or electrical hardware), other ES sections state that cables and fibre chambers will typically be routed along field boundaries. This approach would prevent effective buffering and is likely to increase impacts on sensitive habitats such as	It is the Applicant's view that there is no inconsistency regarding the application of embedded mitigation measures within the Cable Route Corridor (CRC) and the relationship between ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-0154-010] and ES Volume 1, Chapter 2: The Order Limits [APP-054] . The reference in Chapter 2 to routing cables towards the edge of fields reflects an indicative design principle intended to reduce land take and	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		hedgerows, trees and field margins, raising concerns that ecological impacts within the CRC have been underestimated. The proposal to implement ecological buffers along field boundaries is welcomed, with no infrastructure within them. However, routing cables to the edges of fields within the CRC, as proposed, would intrude into these buffer zones, potentially damaging important hedgerows and trees, and conflicts with the Applicant's own mitigation measures. The Council's relevant representation (submitted 9 January 2026) should be read alongside this SoCG for full details of the discrepancy between ES chapters which should be clarified and rectified, and the Council's concerns regarding this issue.	disruption to agricultural operations where practicable. It does not override or negate the embedded mitigation measures set out elsewhere within the Environmental Statement. Within the CRC, the ecological buffers described in ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-0154-010] 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 routing adjacent to field boundaries is proposed, this will be subject to detailed assessment at the construction stage to ensure that unacceptable ecological or	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			arboricultural effects are avoided. This will be secured through the Outline EPMS [REP3-102] and Outline Arboricultural Method Statement [APP-206], which will define working methods, exclusion zones and protection measures as appropriate. A risk-based approach to micro-siting of the final cable route will take into account the presence of priority habitats and habitat of suitability for various protected species and species of conservation concern. Accordingly, the Applicant does not agree that routing cables towards field edges inherently increases ecological impacts, nor that there is a conflict between ES Volume 1, Chapter 9: Ecology and Biodiversity [REP4-0154-010] and ES Volume 1, Chapter 2: The Order Limits [APP-054]. The final alignment within the CRC will be determined through detailed design, applying the mitigation hierarchy and ensuring protection of sensitive ecological and arboricultural features.	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
3.5.25	Mitigation – Site Accesses	The Council supports the intention to utilise existing accesses as far as practicable notwithstanding the Council's concerns regarding the Draft DCO Schedule 12 Part 1 and 2 and the flexibility it affords regarding extent of potential removal.	The Applicant considers the approach set out in ES Volume 1, Chapter 3: The Scheme [APP-055] to utilising existing site accesses where practicable is acceptable.	Under Discussion
3.5.26	Mitigation – Temporary Construction Compounds	The Council welcomes the proposed approach that no temporary construction compounds are located within the greater horseshoe bat SAC consultation zone associated with the Box Mine component of the Bath and Bradford-on-Avon Bats SAC.	<u>The Applicant welcomes the Council's corroboration of this approach.</u> The Applicant welcomes the Wiltshire Council's corroboration on the approach to avoid siting Temporary Construction Compounds within the horseshoe bat SAC consultation zone associated with the Box Mine component of the Bath and Bradford-on-Avon Bats SAC.	Agreed
3.5.27	Additional Mitigation - Breeding Bird Mitigation – Solar PV Sites (Paragraphs 9.77–9.81)	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	The Applicant agrees that, taking a precautionary approach, grassland expected to establish within and beneath panels has been assumed to represent modified grassland and a consistent approach has been taken between the BNG Assessment Report [REP1-089] and ES Volume 1,	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		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 [APP-273] and so it is unclear why there hasn't been consistency of approach within ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]. The Council is concerned that assumption of delivery 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. In addition, supplementary concerns regarding the statement in the above extract of Chapter 9 of the ES that the	Chapter 9: Ecology and Biodiversity [REP4-0101-015] in this respect. However, it is the Applicant's view that <u>modified grassland can nonetheless provide valuable skylark foraging habitat compared with the intensively managed arable cropland that currently comprises most of the Solar PV Sites. Once established it will be under a low-intensity management regime secured by the Outline LEMP [REP3-100], providing year-round seed, plant and invertebrate resources rather than the seasonal availability associated with arable cropping.</u> <u>Skylarks, and particularly chicks, depend heavily on insects and spiders in summer. Pesticide use will be avoided at the operational scheme, as specified in the Outline LEMP [REP3-100], and ceasing the regular applications associated with current arable use can be expected to increase invertebrate prey abundance and diversity. Grassland within buffer zones is likely to provide greater foraging resource still.</u>	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		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 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.	<u>Skylarks have been observed gathering food within operational solar farms and leading young into them. While it is assumed they will typically avoid nesting within solar farms, their foraging requirements are less exacting. The additional mitigation at paragraphs 9.12.31 and 9.12.32 in ES Chapter 9 [REP4-010] is therefore considered deliverable.</u>modified grassland can provide valuable foraging habitat for skylarks, particularly in comparison to arable cropland under intensive management which currently comprises the majority of the Solar PV Sites. Once established, the grassland will be subject to a low intensity management regime during the operation and maintenance phase as secured via the Outline LEMP [APP-283REP3-100] which will be expected to provide a year-round supply of foraging resources (such as seeds, plant and invertebrates) as opposed to the seasonal opportunities associated with arable cropping regimes.	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			Furthermore, skylarks (and particularly chicks) are heavily dependent on insects and spiders during the summer months. As specified with the Outline LEMP [APP-283REP3-100] use of pesticides will be avoided at the operational scheme. The current arable habitats across the Solar PV Sites are likely to be subject to regular pesticide application, and the cessation of this as a result of the Scheme can be expected to increase invertebrate prey abundance and diversity. Grassland habitats expected to establish within buffer zones are likely to provide even greater foraging resources for skylarks than typical existing habitats. Overall, the Applicant considers that the value of the habitat under / between Solar PV Panels and in buffer zones is highly likely to represent better quality foraging habitat for skylarks than the existing arable fields. The Applicant therefore considers the additional mitigation proposed in paragraphs 9.12.31 and 9.12.32 of ES Volume 1, Chapter 9: Ecology and Biodiversity [REP1-015] to be deliverable.	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			Skylarks have been observed gathering food from within operational solar farms and leading young into them, indicating they are valuable foraging resources. Whilst it is assumed that skylarks will typically avoid nesting in solar farms, skylark foraging habitat requirements are less strict.	
3.5.28	Assessment of cleaning of solar panels during the operational phase	Wiltshire Council's statutory consultation response highlighted that the ES should assess the potential for the cleaning and maintenance of the solar panels to result in adverse effects to ecological receptors, particularly the habitats and ground flora within the Solar PV Sites. In terms of the DCO application, the cleaning of solar panels has now been discussed in paragraphs 3.5.26 - 3.5.28 of ES Volume 1, Chapter 3: The Scheme [APP-055] and an annual cleaning cycle has been assumed. However, the suggested likely cleaning frequency set out in [APP-055] doesn't align with that suggested in ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061]	The inconsistency within ES Volume 1, Chapter 9: Ecology and Biodiversity [APP-061] and ES Volume 1, Chapter 3: The Scheme [APP-055] is acknowledged. The assessment and conclusions in ES Volume 1, Chapter 9: Ecology and Biodiversity [REP4-0154-010] have been reviewed assuming an annual cleaning cycle <u>and the text has been updated accordingly.</u> However as this is a small increase and represents a worst case scenario (some sites can operate without the need to be cleaned), the Applicant it is considered that this does not change the conclusions presented in ES Volume 1, Chapter 9: Ecology and Biodiversity [REP4-0154-010] .	Under Discussion <u>Agreed</u>

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		which states in paragraph 9.10.178 that the cleaning of the panels would be infrequent and likely to be no more than every two years. It is therefore recommended that this operational activity is reviewed, and that Chapter 9 assumes an annual cleaning cycle in the interests of being suitably precautionary.		
3.5.29	Outline Ecological Protection and Mitigation Strategy (Outline EPMS)	Wiltshire Council welcome the submission of the Outline Ecological Protection and Mitigation Strategy (Outline EPMS) [APP-284] alongside the DCO Application. Some comments regarding the Outline EPMS are raised in the Council's Written Representation (submitted at Deadline 1).	The proposed ecological protection measures set out within the Outline EPMS [REP3-102] are correctly identified and considered appropriate for protecting habitats and species during the construction phase.	Under Discussion
3.5.30	Outline Landscape and Ecological Management Plan (Outline LEMP)	Wiltshire Council note that an Outline Landscape and Ecological Management Plan (Outline LEMP) [APP-283] has been submitted and requests that submission of a Final version comprises a DCO Requirement.	The principles for managing retained and newly-created habitats and ecological features during the operation and maintenance phase, set out in the Outline LEMP [REP3-100] are correctly identified and appropriate.	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
3.5.31	Biodiversity Net Gain (BNG)	Wiltshire Council has provided detailed comments on BNG and the BNG metric submitted in March 2026 in its Written Representation (submitted at Deadline 1) and has raised a number of issues. At present, therefore, the Council has concerns regarding the BNG submissions. Wiltshire Council has reviewed [REP3-086] 7.8 Biodiversity Net Gain Assessment Report (Rev 3) (Tracked), [REP3-088] 7.9 Biodiversity Net Gain Assessment Appendix Statutory Biodiversity Metric Calculation (Rev 3) (Tracked) and [REP3-089] 7.9 Biodiversity Net Gain Assessment Appendix Statutory Biodiversity Metric Calculation (Rev 3) (Excel Format) submitted at Deadline 3 and it evident that no revisions have been made to the aforementioned submissions that address or overcome the observations raised by the Council.	BNG for NSIPs is not yet mandatory, but the Applicant has sought to meet the requirements as if it were. The approach to assessing and securing BNG, which is detailed in the BNG Assessment Report [REP1-089], is considered acceptable. Plates 3-7 and Plates 13-24 of the Biodiversity Net Gain (BNG) Assessment Report [REP3-085] set out the baseline conditions across the Scheme used for the BNG calculations, as stated in the Council's comment. The baseline data are derived from comprehensive UK Habitat Classification surveys undertaken by experienced surveyors and following the precautionary principle; detailed methodology and survey personnel are set out within ES Volume 3, Appendix 9.1: Ecological Baseline Report [REP1-0834-019]. Plates 8-12 of the BNG Assessment Report [REP3-085] and ES Volume 2, Figure 3-4: Landscape and Ecology Mitigation Plan [REP1-029 to REP 1-032] set out the habitat proposals for	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		During ISH3 on 2nd July 2026 the Inspector raised the matter of the detailed observations regarding the BNG Assessment and Statutory Biodiversity Metric that were made by Wiltshire Council in the Written Representation submitted at Deadline 1 [REP1-138]. Observation 1 was discussed during ISH3, and this matter is considered resolved. The remaining observations (2-11) are set out in the matters below.	the Scheme. These plans reflect anticipated habitat loss and proposals for habitat creation and enhancement measures. Habitat loss has been calculated based on worst-case scenarios; for example, the maximum width of hedgerow crossings has been applied at every cable route crossing point, in line with the maximum widths set out in Section 2.4 of the Outline Ecological Protection and Mitigation Strategy (EPMS). ES Volume 2, Figure 3-1: Indicative Site Layout Plan [REP3-035] provides a worst-case scenario for the proposed area-based habitat losses within the Scheme, as the maximum extent of panel coverage and permanent (for the duration of the Operational phase) infrastructure has been applied. The BNG calculations presented within the Statutory Biodiversity Metric [REP3-087] and BNG Assessment Report [REP3-085] reflect a reasonable worst-case scenario, in line with the overarching methodology for	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			the entire Development Consent Order (DCO) application.	
3.5.32	Biodiversity Net Gain (BNG)	Observation 2 The submitted BNG Metric [PDA-008] does not include habitat reference numbers across the relevant habitat, hedgerow and watercourse tabs, preventing clear cross-referencing between metric calculations and the associated baseline and proposed habitat plans. Despite the Applicant's explanation that habitat parcels were consolidated due to the large number of polygons generated, this is not considered a sufficient justification for their omission. As a result, the Council's Ecology Officer has been unable to verify or corroborate the BNG Metric and BNG Assessment Report [APP-273] with the necessary level of confidence, limiting the robustness of the review and the evidential basis underpinning the scheme's ecological impact assessment and	The Applicant acknowledges that Habitat Reference numbers provide a useful tool with which the Statutory Biodiversity Metric [REP3-087] could be compared to associated baseline and proposed habitat mapping, and the content of the Biodiversity Net Gain Assessment (BNG) Report [REP3-085]. Owing to the sheer number of individual habitat parcels (2,229 for Habitat Units alone), the data were consolidated within the Statutory Biodiversity Metric [REP3-087], 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	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		habitat mitigation, creation and enhancement proposals.		
3.5.33	Biodiversity Net Gain (BNG)	Observation 3 The submitted BNG evidence lacks sufficient transparency and verifiability because only the combined Solar PV Sites and cable route corridor (CRC) metric was provided, while the separate Solar PV Sites metric referenced in the BNG Assessment Report [APP-273] and a standalone CRC metric were not submitted. Combined with the absence of habitat reference numbers, this prevents effective interrogation of the calculations, verification of habitat and hedgerow losses, reinstatement and enhancement measures within the CRC, and confirmation that biodiversity unit calculations, habitat creation assumptions and hedgerow gains/losses have been	As set out within the Biodiversity Net Gain (BNG) Assessment Report [REP3-085], 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 [REP3-087] includes baseline and proposed habitats within the Solar PV Sites and Cable Route Corridor (CRC). Within the BNG Assessment Report [REP3-085], 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	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		accurately recorded and not double counted.	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 [REP3-087] and subsequent omission of 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 [REP3-085].	
3.5.34	Biodiversity Net Gain (BNG)	Observation 4 Condition assessment sheets and detailed habitat condition assessment information have not been provided alongside the BNG Metric or within the BNG Assessment Report [APP-273], contrary to the expectations of the	Figures showing the baseline and proposed habitats are provided in Plates 3 - 24 at the end of the Biodiversity Net Gain (BNG) Assessment Report [REP3-085]. Given the sheer number of area and linear habitat parcels present across the Scheme, it was not considered proportionate to provide each condition	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		Statutory Biodiversity Metric User Guide. Although the applicant cites the large number of habitat parcels as justification, no evidence has been provided to demonstrate that this approach is supported by guidance. Consequently, the Council's Ecology Officer has been unable to verify the condition assessments assigned to habitats within the metric, reducing confidence in the robustness and accuracy of the biodiversity calculations.	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 [REP3-085] . The Applicant acknowledges that this approach deviates from the guidance set out within The Statutory Biodiversity Metric User Guide (Feb 2024; updated June 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.	
3.5.35	Biodiversity Net Gain (BNG)	Observation 5 The Council note that 17ha of the CRC had not been surveyed prior to the production of the BNG assessment report.	The Applicant can confirm updated versions of the Statutory Biodiversity Metric [REP3-087] and BNG Assessment Report [REP3-085] were submitted at Deadline 1 following	<u>Under Discussion</u> <u>Agreed</u>

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			completion of baseline surveys within the Cable Route Corridor.	
3.5.36	Biodiversity Net Gain (BNG)	Observation 6 The BNG Assessment Report [APP-273] applies relatively large minimum mapping units (MMUs) of 400m² for area habitats and 20m for linear features, resulting in smaller habitat parcels not being individually mapped or included within the metric. The Council is concerned that this approach may reduce the accuracy of the baseline assessment by overlooking or subsuming smaller, higher-value habitats, potentially affecting biodiversity unit calculations and the claimed margin of error. Furthermore, although the approach is stated to be consistent with UKHab guidance, no specific references or robust evidence have been provided to demonstrate that the adopted MMUs are supported by published guidance or are appropriate for the habitats present across the Scheme, limiting the	<u>The MMUs were determined from Section 2.2 of the UK Habitat Classification User Manual v1.0 (May 2018), which recommends a fine-scale MMU (25 m², 5 m length) where detailed mapping of small features is required, such as urban or small-scale rural projects and designated site surveys, and a large-scale MMU (400 m² polygon, 20 m length) for landscape-scale survey or where data are collected at broader scales.</u> <u>UKHab v2.0 (2023) supersedes v1.0 but provides no specific guidance on MMU size, and the Applicant is aware of no alternative published guidance from UKHab Ltd or another professional body. Applying the most recent MMU-specific guidance, taking account of site size and scheme context, was therefore considered the most appropriate and robust basis for consistent habitat mapping. See also the response to WC-069 at pages 146–150 of the Applicant's Response to</u>	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		ability to verify the validity of the methodology.	<u>Written Representations [REP2-039]</u> 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: “The UKHab has been designed to function at two scales: • 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	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			<i>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 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	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			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	
3.5.37	Biodiversity Net Gain (BNG)	Observation 7 The BNG Assessment Report [APP-273] does not explain whether or how the stated minimum mapping units (MMUs) were applied to the Cable Route Corridor (CRC), nor does it provide a specific methodology or justification for their use in this narrower and more linear part of the Scheme. Given that the metric includes the CRC, the	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 (CRC) 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	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		Council considers that the MMU approach should be clearly documented and consistently applied across the Order Limits, with robust evidence demonstrating its appropriateness. In the absence of this information, and given existing concerns regarding the MMUs adopted for the Solar PV Sites, the validity and accuracy of the habitat mapping and biodiversity calculations for the CRC cannot be readily verified.	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.	
3.5.38	Biodiversity Net Gain (BNG)	Observation 8 The submitted BNG Metric [PDA-008] does not comply with the Statutory Biodiversity Metric User Guide in its treatment of irreplaceable habitats, as all 52 recorded ancient and veteran trees across the Solar PV Sites and Cable Route Corridor have been grouped into a single row rather than recorded individually. No justification for this approach has been provided in the metric or BNG Assessment Report [APP-273], despite the User	The Applicant acknowledges that all individual trees comprising Irreplaceable Habitat have been grouped within a single row within the Statutory Biodiversity Metric [REP3-087]. 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	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		Guide requiring each tree to be entered separately. Furthermore, the methodology used to derive the baseline veteran tree area of 3.10 hectares is unclear, particularly as the Tree Helper tool does not appear to have been completed, limiting the Council's ability to verify the accuracy and robustness of the metric calculations relating to these irreplaceable habitats.	Irreplaceable Habitats tab of the Statutory Biodiversity Metric [REP3-087] comprised the following individual 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.	
3.5.39	Biodiversity Net Gain (BNG)	Observation 9 • The submitted BNG Metric [PDA-008] does not fully comply with the	The Applicant has confirmed that the number of individual trees corresponding to Baseline Habitat References 46, 48 and 49 within the	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		Statutory Biodiversity Metric User Guide for Individual Trees habitats, as several habitat parcels (baseline references 46, 48 and 49 on the A-1 On-Site Habitat Baseline tab, and habitat reference 11 on the A-2 On-Site Habitat Creation tab) have blank User Comments fields. As the User Guide requires the number of trees contributing to each Individual Trees habitat area to be recorded in the User Comments, the omission of this information limits transparency and prevents verification of the accuracy of the habitat area calculations.	Statutory Biodiversity Metric [REP3-087] are as follows: Habitat Reference 46: • 7 small trees in 'Good' condition (0.0285ha); • 20 medium trees in 'Good' condition (0.3257ha); • 36 large trees in 'Good' condition (1.3192ha); and • 19 very large trees in 'Good' condition (1.4526ha). Habitat Reference 48: • 2 medium trees in 'Moderate' condition (0.0326ha); and • 2 very large trees in 'Moderate' condition (0.1529ha). Habitat Reference 49: • 5 medium trees in 'Good' condition (0.0814ha); and • 1 large tree in 'Good' condition (0.0366ha). All proposed individual trees within the Scheme (659 total) have been	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			prescribed a tree size class of 'small' and target condition of 'Moderate', as set out within Paragraph 1.7.38 of the Biodiversity Net Gain (BNG) Assessment Report [REP3-085] . Classification of all proposed individual trees as 'small' in size is in line with best practice guidance set out on Page 61 of The Statutory Biodiversity Metric User Guide (Feb 2024; last updated June 2026).	
3.5.40	Biodiversity Net Gain (BNG)	Observation 10 The submitted BNG Metric [PDA-008] contains a Trading Rules failure for the Cropland broad habitat group, with losses of medium distinctiveness habitats (including arable field margins for game bird mix and pollen and nectar) not fully offset by gains at the required distinctiveness level. Although the BNG Assessment Report [APP-273] justifies this on the basis that proposed grassland and set-aside habitats will provide equivalent ecological functions and therefore achieve compliance in	The Applicant notes the Council's view regarding the rationale provided to address Trading Rule errors within the Biodiversity Net Gain (BNG) Assessment Report [REP3-085] appears to be reasonable. Justification for the consolidation of habitat rows within the Statutory Biodiversity Metric [REP3-087] and subsequent omission of individual habitat parcel references is provided in the relevant response for Observation 2 above.	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		real-world terms, the absence of habitat reference numbers and clear cross-referencing between the metric and associated plans limits the ability to fully verify and scrutinise this conclusion, notwithstanding that the rationale appears reasonable in principle.		
3.5.41	Biodiversity Net Gain (BNG)	Observation 11 The Council has consistently advised that the BNG Assessment and metric should assume that only modified grassland in poor condition is achievable beneath and between the solar panels. Although the habitat plans included within the BNG Assessment Report [APP-273] appear to broadly reflect this approach and paragraph 1.7.33 sets out grassland habitat types and target conditions consistent with the Council's expectations, the absence of habitat reference numbers linking the metric to the plans prevents detailed verification that this assumption has been applied	<u>All grassland beneath and between the panels is proposed as modified grassland of poor condition.</u> <u>Where grassland exists at baseline within the Solar PV Sites, it is assumed lost within panel areas during construction and subsequently created, as set out at paragraph 1.7.8 of the BNG Assessment Report [REP3-085]; creation proposals for areas beneath and between panels are at paragraph 1.7.33. This precautionary approach reflects Clarkson and Woods' experience monitoring operational solar farms in the UK and is in line with the Council's expectations.</u> <u>Paragraph 1.2.8 of the Report records that baseline and proposed habitat</u>	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		consistently across the entirety of the Solar PV Sites.	<u>data have been consolidated within the Metric [REP3-087] in accordance with the Statutory Biodiversity Metric QGIS Template and GIS Import Tool User Guide, which precludes assignment of individual parcel references between the QGIS mapping and the Metric, as addressed at Observation 2 (3.5.32).</u> <u>The Applicant considers the BNG Assessment Report [REP3-085]; provides sufficient assurance as to grassland condition beneath and between the panels without parcel references. The proposals in the BNG Assessment Report [REP3-085]; and Metric [REP3-087] will be secured by DCO requirement. The Applicant confirms that all grassland habitat beneath and between Solar PV panels is proposed as modified grassland of poor condition.</u> <u>Where grassland habitats exist within the Solar PV Sites at baseline, it has been assumed that this habitat will be lost within panel areas during construction and subsequently created set out within Paragraph 1.7.8 of the</u>	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			Biodiversity Net Gain (BNG) Assessment Report [REP3-085]. As referenced by the Council, proposals for grassland creation beneath and between the Solar PV panels are set out within Paragraph 1.7.33 of the BNG Assessment Report [REP3-085]. The BNG Assessment Report [REP3-085] therefore clarifies that only modified grassland of poor condition is proposed beneath and between Solar PV panels, based on the precautionary approach informed by Clarkson and Woods' extensive experience monitoring operational solar farms within the UK and in line with the expectations of the Council. It is recognised in Paragraph 1.2.8 of the BNG Assessment Report [REP3-085] that baseline and proposed habitat data have been consolidated within the Statutory Biodiversity Metric [REP3-087], 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	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			Applicant's view, sufficient justification for this decision has been provided. Consolidation of data within the Metric precludes assignment of individual parcel references between QGIS mapping and the Metric; further detail on this matter is provided by the Applicant in the relevant response above. It is the Applicant's view that sufficient reassurance is provided with regards to grassland condition beneath and between the Solar PV panels within the BNG Assessment Report [REP3-085] and panels therein, without the need for specific parcel references. The proposals within the BNG Assessment Report [REP3-085] and Statutory Biodiversity Metric [REP3-087] will be secured via DCO Requirements.	
3.5. 34 <u>2</u>	Targeted consultation	The Council has consistently raised concerns about the following changes that formed part of a targeted consultation: • Change 7: South West of Rodbourne, Lime Down E where works have	The Traditional Orchard referred to with reference to Change Location 10 lies within a private residential property and is outside of the Order Limits, beyond an existing road verge. Change Location 10 refers to a Highway Improvement Area, which as stated in	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		potential to impact the edge of an ancient broadleaved woodland / priority habitat / HPI that is known as North Bincombe Wood and is also designated as a CWS named Rodbourne Plantation; and • Change Location 10: A429 / B4014 Roundabout where the potential for impacts to traditional orchard priority habitat / HPI should be determined and addressed, where necessary; The Council's stance is that this matter has not been overcome or suitably addressed to date. The Council remains particularly concerned about the potential for adverse effects upon, and damage to North Bincombe ancient woodland which has been subsumed into the Order Limits boundary, and in turn the potential for adverse effects upon species that use the woodland.	paragraph 3.2.5 of ES Volume 1, Chapter 3: The Scheme [APP-055] comprises a section of the highway network which will be subject to localised improvements. Any such works at this location would not extend into the curtilage of the private property and thus no impacts to the Traditional Orchard within are anticipated. Regarding Change 7 at North Bincombe Wood, the treatment of this area has been amended by the Applicant so that an alternative construction access track has been proposed to maintain a minimum 15 m buffer from the boundary of the North Bincombe Wood ancient woodland, and ensure impacts on the woodland here are avoided. Where the existing track lies within the 15 m buffer from North Bincombe Wood, any upgrades to the existing track will follow a specialist 'no-dig' construction methodology and specification to avoid the need to excavate and potentially incur root damage. If required, the access track	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			will be built on top of the existing ground level, with no digging into the ground for a sub-base. No heavy vehicles or machinery will be used along the track where it lies within the 15 m buffer zone of the North Bincombe Wood ancient woodland. The Outline CEMP [REP43-09249] and ES Volume 2, Figure 3-4-5.1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [REP1-032] have been updated to reflect this change.	
3.5.433	Draft DCO - Schedule 12 – Hedgerows to be Removed	The Council has consistently raised concern regarding the Draft DCO. These issues have most recently been set out in detail in the Council's Written Representation (submitted at Deadline 1) which should be read alongside this SoCG. The Council notes the Applicant's Position Statement regarding the controls secured by the outline EPMS, but therefore continues to question why the level of flexibility afforded by Schedule 12 Part 1 and 2 is necessary if the scheme design is sufficiently refined and progressed and works will largely accord with the	The Outline EMPS [REP34-40552] contains the Hedgerow Removal Plan at Annex A. This is in turn secured by Requirement 8 within the Draft DCO [REP43-0045]. As such, breach of the controls within the Hedgerow Removal Plan would be a criminal offence. It is the Applicant's view therefore that it is not necessary to include controls in relation to hedgerow removal within the main body of the DCO.	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		Hedgerow Removal Plan at Annex A. The Council remains concerned regarding this issue and maintains its stance regarding the scope of Schedule 12 being too broad and all-encompassing.		
3.5.434	Draft DCO - Other Matters	If the expectation is that Wiltshire Council will carry out all monitoring and compliance obligations during the lifetime of the Scheme, for example in relation to monitoring of the efficacy of ecological mitigation strategies, the LEMP or delivery of BNG, it will be necessary for an appropriate monitoring and compliance fee / financial contribution(s) and is index linked to be secured. Given the substantive scale of the Scheme together with the duration of the operational phase, it is requested and strongly advised that Wiltshire Council is party to the discussions on this matter.	Wiltshire Council will not be expected to carry out monitoring in relation to the efficacy of ecological mitigation strategies. The preparation, approval and implementation of a detailed Ecological Protection and Mitigation Strategy (EPMS) and a detailed Landscape and Ecological Management Plan (LEMP), substantially in accordance with the Outline EPMS [REAPP3-283102] and the Outline LEMP [REP31-1006], are secured through requirements in Schedule 2 of the Draft DCO [REP31-0075]. Either the Applicant or (should the Applicant transfer the Scheme to a suitably qualified party) the future Scheme owner will be responsible for appointing land managers / contractors and ecologists, in order to ensure all measures within the are delivered,	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			including the ecological monitoring strategy set out in section 1.4 of the Outline LEMP [REP3APP-283100]. With regard to monitoring the Applicant has provided its response in matter 3.2.4 above.	

3.6 Arboriculture

Table 3-6: Arboriculture

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
3.6.1	Legislation and Policy	Wiltshire Council is satisfied with the Legislation and Policies applied for the Environmental Impact Assessment for Arboriculture.	The Applicant considers that ES Volume 1, Chapter 10: Arboriculture [APP-062] has identified and appropriately considered all applicable legislation and policy.	Agreed
3.6.2	Methodology	Wiltshire Council is satisfied with the methodology used for ES Volume 1, Chapter 10: Arboriculture [APP-062] .	The methodology adopted within section 10.6 of ES Volume 1, Chapter 10: Arboriculture [APP-062] has been derived from the information obtained through consultation with stakeholders and by reviewing relevant guidance and studies and is considered acceptable.	Agreed
3.6.3	Baseline	Wiltshire Council is satisfied with the baseline assessment presented in ES Volume 1, Chapter 10: Arboriculture [APP-062] .	The baseline conditions which are detailed in ES Volume 1, Chapter 10: Arboriculture [APP-062] , ES Volume 2, Figure 10-1-1 to 10-1-23: Tree Constraints Plan [APP-133] , and ES Volume 3, Appendix 10-2: Tree Survey Schedules [APP-207] are representative of the baseline site conditions.	Agreed

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
3.6.4	Assessment Results	Wiltshire Council is satisfied with the assessment results presented in ES Volume 1, Chapter 10: Arboriculture [APP-062] . However However, notes that this will be dependent on detailed design. Surveys are ongoing.	The assessment results set out within ES Volume 1, Chapter 10: Arboriculture [APP-062] , including likely significant effects anticipated, are acceptable.	Agreed
3.6.5	Mitigation	Wiltshire Council is satisfied with the Mitigations presented in sections 10.9 and 10.11 of ES Volume 1, Chapter 10: Arboriculture [APP-062]. However notes that this will be dependent on detailed design. The detailed AMS and AIA should be submitted to the council for its approval under a standalone Requirement within the DCO and for these documents to be certified. Please note issues relating to planting, replacement and monitoring are covered in subsequent rows below.	The proposed mitigation measures set out within sections 10.9 and 10.11 of ES Volume 1, Chapter 10: Arboriculture [APP-062], and secured within the Arboricultural Impact Assessment and Outline Arboricultural Method Statement [APP-206] and the Outline LEMP [REP3-100] and Outline EPMS [REP43-10552] are considered acceptable. Draft DCO [REP34-0054] Schedule 2 Requirement 13 requires the submission and approval of a Construction Environmental Management Plan (CEMP) by the relevant planning authority prior to the commencement of construction. The approved CEMP must be substantially	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			in accordance with the Outline CEMP [REP43-0492]. Table 4 of the Outline CEMP identifies the requirement for an Arboricultural Method Statement (AMS) to be prepared following completion of the detailed design. The Applicant therefore considers that the production, approval and implementation of the AMS is already appropriately secured through Requirement 13 and that no additional standalone Requirement is necessary.	
3.6.6	Arboricultural Method Statement	Wiltshire Council has reviewed the Outline Arboricultural Method Statement [APP-206]. Wiltshire Council expects that a detailed Arboricultural Method Statement (AMS), based on post-DCO detailed design, will be produced prior to construction commencing and will be included within the detailed CEMP. This must be submitted to the council for its review and approval. The Council require additional information in a Detailed AMS in	The Applicant will include the aforementioned points in the detailed Arboricultural Method Statement insofar as they relate to works that have the potential to impact retained arboricultural features. The Applicant notes the comment regarding Requirement 13 of Schedule 2 of the Draft DCO [REP34-0045]. Schedule 2 Requirement 13 requires the submission and approval of a Construction Environmental Management Plan (CEMP) by the relevant planning authority prior to the	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		relation to piling and foundations, and their locations in relation to trees. This should include the Tree Protection Plans and relevant signage. Council requirements as detailed within its Relevant Representation and Local Impact Report should be secured in DCO, if consented, and for the Detailed AMS and AIA to be certified documents under the DCO. Please note issues relating to Arboricultural Method Statement are also covered in subsequent rows below.	commencement of construction. The approved CEMP must be substantially in accordance with the Outline CEMP [REP43-0492]. Table 4 of the Outline CEMP identifies the requirement for an Arboricultural Method Statement (AMS) to be prepared following completion of the detailed design. The Applicant therefore considers that the production, approval and implementation of the AMS is already appropriately secured through Requirement 13 and that no additional standalone Requirement is necessary.	
3.6.7	Outline Construction Environmental Management Plan (CEMP)	The Council notes that a 242 m section of internal access track is proposed within the 15 m buffer of North Bincombe Wood (ancient woodland), using an existing gravel track. While no tree removal is proposed and retention of the existing subbase is preferred, the Council highlights a risk to woodland edge trees, as hand excavation and root pruning could lead to the loss of fibrous roots.	The proposed mitigation measures set out within sections 10.9 and 10.11 of ES Volume 1, Chapter 10: Arboriculture [APP-062], and secured within ES Volume 3, Appendix 10-1: Arboricultural Impact Assessment and Outline Arboricultural Method Statement [APP-206] and the Outline LEMP [REP3-100] and Outline EPMS [REP34-10552] are considered acceptable.	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		The Council accepts the principle of mitigation measures set out in the Outline CEMP but remains cautious, emphasising that works within buffer zones and RPAs present a risk to tree health. The Council's stance is that strict adherence to BS5837 standards, effective ground protection, and active Arboricultural Clerk of Works supervision will be essential to minimise harm, and that the potential impacts on ancient woodland trees must be carefully managed and justified. The council considers that the AIA and Detailed AMS should be approved through its own standalone Requirement for Arboriculture rather than subsumed within the CEMP. <u>The Council remains concerned that the repair methodology has not been sufficiently constrained within the track at North Bincombe Wood. The Council would like to see the inclusion of wording within the CEMP and detailed Arboricultural Method Statement confirming that:</u>	The alignment of the access track referenced has been amended to avoid using the existing road and a 15m buffer zone has been proposed. Detailed alignment to be provided in future through detailed design. The Applicant does not consider a standalone Requirement to be necessary. The proposed approach secures the preparation and approval of an AMS by the relevant planning authority through Requirement 13 and the Outline CEMP. Whether the AMS is secured as a standalone document or as part of the CEMP approval process does not alter the level of control afforded to Wiltshire Council, and the Applicant therefore considers the current drafting to be appropriate and proportionate. <u>The Applicant acknowledges Wiltshire Council's proposed wording relating to additional restrictions on the use of the existing access track adjacent to North Bincombe Wood. The Applicant is currently reviewing the proposed drafting and discussions with Wiltshire</u>	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		<u>"Any repairs to the access track at North Bincombe Wood shall be limited to the infilling of potholes using no-fines gravel and topsoil only and shall be undertaken solely for the purposes of ensuring the track is suitable for continued hedgerow / vegetation management."</u> <u>This restriction would minimise impacts within Root Protection Areas and avoid the gradual intensification or upgrading of the track.</u>	<u>Council remain ongoing. Subject to the outcome of those discussions, the Applicant intends to provide updated wording for consideration at Deadline 6. Until that time, this matter remains under discussion between the parties.</u>	
3.6.8	Outline CTMP	The Council considers that details in relation to laydown and accommodation areas should be included within the Detailed AMS so that the impact on trees and hedgerows can be fully assessed and considered. The council considers that the AIA and Detailed AMS should be approved through its own standalone Requirement for Arboriculture rather than subsumed within the CTMP. Information should be collated in one	In Section 2.9 of the Outline CEMP [REP43-0492] it sets out '<i>The location and size of parking provisions on-site, loading and unloading areas for plant and materials, storage areas, wheel washing facilities and construction traffic management measures will be set out in the CTMP, which will also include a description of any laydown areas or accommodation areas.</i>' The Applicant does not consider a standalone Requirement to be necessary. The proposed approach secures the preparation and approval	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		place for approval rather than spread across multiple documents. Wiltshire Council requests that there is a 10 metre buffer from the boundary of the temporary construction compounds to any Category A, Category B, Veteran or Ancient tree.	of an AMS by the relevant planning authority through Requirement 13 and the Outline CEMP. Whether the AMS is secured as a standalone document or as part of the CEMP approval process does not alter the level of control afforded to Wiltshire Council, and the Applicant therefore considers the current drafting to be appropriate and proportionate. Temporary construction compounds will be located outside the RPAs of retained trees, regardless of quality category.	
3.6.9	Battery Energy Storage System	Further information is required to ensure the detailed AMS will inform site operatives with regard to how the foundations of the BESS will be constructed in close proximity to trees. Council approval of the Detailed AMS and Tree Protection Plans are required under its own Arboriculture Requirement within the DCO. Documents to be certified under DCO.	The detailed Arboricultural Method Statement will set out the construction methodology where works are to be undertaken in proximity to trees. At the pre-construction stage, an Arboricultural Clerk of Works will be appointed to define and oversee the implementation of tree protection measures. The location of trees is presented in ES Volume 2, Figure 10-2-4: Tree Impact Plan [APP-134] and the BESS is	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			located sufficiently distant from them so that they will not be impacted. Protection measures for these trees will be installed if deemed necessary by the Arboricultural Clerk of Works at the pre-construction stage. The Applicant does not consider a standalone Requirement to be necessary. The proposed approach secures the preparation and approval of an AMS by the relevant planning authority through Requirement 13 and the Outline CEMP. Whether the AMS is secured as a standalone document or as part of the CEMP approval process does not alter the level of control afforded to Wiltshire Council, and the Applicant therefore considers the current drafting to be appropriate and proportionate.	
3.6.10	Cable Route Corridor - temporary construction compound areas	In relation to the 15m buffer of Surrendell Wood, Wiltshire Council is concerned that the current information does not clearly demonstrate how impacts on trees and ancient woodland	Construction-phase tree protection and management measures are set out in the Outline CEMP [REP34-0492] . The preparation, approval and implementation of detailed management plans, substantially in accordance with the outline plans, are	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		will be avoided or adequately managed including: Uncertainty over compound construction methods. Inconsistencies in submitted plans, as only six compounds can be identified on the Tree Impact Plans, despite seven being described. Potential encroachment into tree canopies and Root Protection Areas (RPAs), which conflicts with the Outline CEMP's statement that compounds will be sited outside these areas. Indicated 'possible tree impacts' on at least one Tree Impact Plan, suggesting a risk to adjacent trees and woodland. Council approval of the Detailed AMS and Tree Protection Plans are required under its own Arboriculture Requirement within the DCO. Council requirements as detailed within its Relevant Representation and Local Impact Report to be secured in DCO, if consented, and for the Detailed AMS	secured through requirements in Schedule 2 of the Draft DCO [REP43-0045], ensuring ancient and veteran trees are protected throughout the lifetime of the Scheme. A detailed CEMP will be produced, a requirement of which is to also produce an AMS. Both the CEMP and AMS will require sign off from Wiltshire Council. As stated in the Outline CEMP [REP34-0492], Temporary Construction Compounds will be located outside the canopy spread and Root Protection Areas (RPAs) of adjacent trees and woodland. As stated in Paragraph 2.1.20 of the Arboricultural Impact Assessment and Outline Arboricultural Method Statement [APP-206] '<i>The positions of all trees, groups of trees and woodlands plotted in the Cable Route Corridor survey were estimated from aerial imagery with the assistance of GPS hardware only and not based on a topographical survey.</i>' The track adjacent to Surrendell Wood has been subject to historical heavy	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		and AIA to be certified documents under the DCO. <u>The Council's Arboricultural Officers consider that the continued use of the existing track in its current alignment is preferable and less environmentally intrusive than the creation of a new access route within or adjacent to the ancient woodland buffer. The construction of a new track would result in additional disturbance to soils, roots, ground flora and the wider woodland edge environment, whereas the use of an established route avoids the need for further land take and excavation.</u> <u>Whilst the Council accepts the principle of using the existing track, it has the following concerns:</u> <u>The potential for construction traffic to deviate from the existing track and encroach into adjacent woodland habitat.</u> <u>Localised degradation of the track surface that could lead to rutting, soil compaction or indirect impacts</u>	agricultural machinery use and ground conditions along the track are expected to be compacted as a result. This compaction and the localised variances in ground levels between woodland trees, the existing access surface and the outer limits of the proposed temporary construction compound make for unfavourable growing conditions and the potential for root ingress to the full extents of the 15m buffer Zone is considered low. Any impacts to Surrendell Wood as a result of the construction of the Temporary Construction Compound are considered to be neutral, taking into account that construction of the Temporary Construction Compound will be outside the canopy spread and RPAs of retained trees and be sited in accordance with the commitments set out in the Outline CEMP [REP3REP4-092049]. The Applicant does not consider a standalone Requirement to be necessary. The proposed approach secures the preparation and approval of an AMS by the relevant planning	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		<u>on retained trees and woodland edge habitats.</u> <u>Any excavation, widening, resurfacing or other ground disturbance within the 15m buffer which could adversely affect soils and tree rooting environments associated with the ancient woodland.</u> <u>The Council's Arboricultural Officers agree that use of the existing track is less intrusive than the creation of a new access route. Provided the track remains within its existing footprint and is used appropriately, this approach minimises disturbance to the ancient woodland and avoids unnecessary impacts associated with new construction works.</u> <u>The Council considers the following mitigation, monitoring and controls measures necessary:</u> <u>Protective fencing should be installed where appropriate along the woodland edge to prevent vehicle egress from the existing</u>	authority through Requirement 13 and the Outline CEMP. Whether the AMS is secured as a standalone document or as part of the CEMP approval process does not alter the level of control afforded to Wiltshire Council, and the Applicant therefore considers the current drafting to be appropriate and proportionate. <u>The Applicant considers that appropriate mitigation and monitoring are already secured through the Arboricultural Method Statement and the Outline CEMP [REP4-049], which together provide suitable protection for Surrendell Wood during construction.</u> <u>Notwithstanding this position, discussions with Wiltshire Council are continuing to determine whether any additional commitments can be agreed. Subject to the outcome of those discussions, the Applicant will provide any agreed amendments to the relevant management plans at Deadline 6. Until that time, this matter remains under discussion between the parties.</u>	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		track, in accordance with the principles of BS 5837:2012 Trees in Relation to Design, Demolition and Construction. • Suitable ground protection measures should be used in locations where the existing track demonstrates insufficient stability for the size and weight of construction vehicles. • No excavation, track widening or other ground disturbance should take place within any part of the track located inside the 15m ancient woodland buffer. • Any works or activities within the buffer that are not already addressed through the Construction Environmental Management Plan (CEMP) and Arboricultural Method Statement (AMS) should be monitored and recorded by the Arboricultural Clerk of Works (ACoW). • The Local Planning Authority should be informed of any incidents.		

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		departures from the approved AMS, or evidence of adverse effects on the ancient woodland so that appropriate remedial measures can be considered and implemented. Subject to the above mitigation, monitoring and control measures, Wiltshire Council's Arboricultural Officers do not object to the use of the existing access track and consider it to represent the least environmentally intrusive option.		
3.6.11	Schedule 13 of the draft DCO	The Arboricultural Impact Assessment (AIA) and Arboricultural Method Statement (AMS) should be included in Schedule 13 of the draft Development Consent Order (DCO) so they are formally identified and certified by the Secretary of State as the approved versions of those documents. They become the definitive documents against which the authorised development must be carried out. Wiltshire Council still require that the Arboricultural Impact Assessment (AIA) and Arboricultural Method Statement	The Applicant does not consider a standalone Requirement to be necessary. The AIA is presently an Appendix to the Environmental Statement which itself is a certified document within Schedule 13 of the DCO. The proposed approach secures the preparation and approval of an AMS by the relevant planning authority through Requirement 13 and the Outline CEMP. Whether the AMS is secured as a standalone document or as part of the CEMP approval process does not alter the level of control afforded to Wiltshire Council, and the	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		<u>(AMS) should be included in Schedule 13 of the draft Development Consent Order (DCO) so they are formally identified and certified by the Secretary of State as the approved versions of those documents to provide a robust schedule over the period of the scheme.</u>	Applicant therefore considers the current drafting to be appropriate and proportionate.	
3.6.12	Outline Operational Environmental Management Plan (OEMP)	It is stated that: “Should the existing track adjacent to Bincombe Wood be used during the operational stage, any upgrade to the track will follow a specialist ‘no-dig’ construction methodology and specification to avoid the need to excavate and potentially incur root damage. If required, the access track will be built on top of the existing ground level, with no digging into the ground for a subbase. Detailed design of the access track will take place post-DCO and will include consideration of cellular confinement systems with high load bearing capacities.” The track to the north of Bincombe Wood forms part of the 15-metre buffer zone within the Ordre Limits and is	The Applicant notes this comment. The existing track adjacent to Bincombe Wood is currently in a poor state of repair, with existing defects and surface degradation arising from its ongoing use by landowners and agricultural tenants. As such, it is anticipated that some form of repair or upgrade may be required to facilitate its continued use, irrespective of the Scheme. Any such works associated with the Scheme would be undertaken using a suitable no-dig construction methodology designed to avoid excavation, minimise ground disturbance and prevent impacts to adjacent trees, roots and ancient woodland buffers.	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		therefore considered an exclusion zone. As such, it should not be accessed or used by the Applicant for any purpose associated with the proposed development. The track should not provide any form of construction, operational, or maintenance access to the PV sites. Its use should remain restricted to landowners and farmers who currently utilise the track. Furthermore, hedgerow management adjacent to the track should continue in accordance with existing management practices that have been undertaken in previous years, ensuring the continued maintenance of the hedgerow and its associated ecological and landscape value. <u>The Council continues to seek clarification and certainty regarding the future use of the access track at North Bincombe Wood.</u> <u>The Council would like to see the inclusion of wording confirming that:</u> <u>"The access track at North Bincombe Wood shall be used solely for</u>	During the operational phase, use of the track by the Applicant would be limited to occasional maintenance and inspection activities, undertaken using light vehicles where appropriate. The frequency and nature of such access would be low and consistent with the operational requirements of the Scheme. Existing landowner and agricultural access arrangements would be retained, and any adjacent hedgerow management would continue in accordance with established management practices and relevant environmental commitments secured through the DCO. <u>The Applicant acknowledges Wiltshire Council's proposed wording relating to additional restrictions on the use of the existing access track adjacent to North Bincombe Wood. The Applicant is currently reviewing the proposed drafting and discussions with Wiltshire Council remain ongoing. Subject to the outcome of those discussions, the Applicant intends to provide updated wording for consideration at Deadline 6. Until that time, this matter remains</u>	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		<u>monitoring and maintenance activities associated with the adjacent hedgerow / vegetation and for no other operational or maintenance purpose."</u> <u>This would provide certainty regarding the scope of future usage and minimise the risk of incremental impacts on adjacent woodland, trees and habitats.</u>	<u>under discussion between the parties. Text under review to add wording to CEMP</u>	
3.6.13	Article 41 of the draft DCO	Whilst Article 41 of the draft Development Consent Order (DCO) removes the requirement to obtain consent for works to protected trees, the Local Planning Authority considers that any works affecting trees protected by a Tree Preservation Order (TPO) within the Order Limits should nevertheless be subject to approval by the Local Planning Authority. This would enable the continued involvement of the Authority's tree specialists in reviewing proposed works and determining their appropriateness in relation to protected trees. Furthermore, the Local Planning Authority considers that it should retain the ability to make new Tree	The Applicant does not agree that separate approval under the TPO regime is necessary. Article 41 provides a deemed consent for works to protected trees where the undertaker reasonably believes such works are necessary for the construction, operation, maintenance or decommissioning of the authorised development. This is a well-established approach within DCOs and avoids duplication of separate consenting regimes following the grant of development consent. It also reflects the Applicant's existing powers under the Electricity Act 1984, being a	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		Preservation Orders within the Order Limits throughout the 60-year operational life of the development. Any trees protected by such future Orders should remain subject to the relevant TPO controls, with the applicant required to seek approval from the Local Planning Authority before undertaking any works to those trees. <u>Wiltshire Council Arboricultural Officers are satisfied that the proposed five working day notice period set out in paragraph 4(b) is reasonable in relation to trees protected by Tree Preservation Orders.</u> <u>However, the Council would recommend that the provision is extended to include trees within Conservation Areas that are subject to the notification requirements of Section 211 of the Town and Country Planning Act 1990. This would ensure that trees contributing to the character and appearance of Conservation Areas are afforded equivalent consideration and protection.</u>	statutory undertaker by virtue of its generating licence. The impacts on protected trees have been assessed as part of the ES and appropriate mitigation is secured through the draft DCO and the Outline CEMP, including the requirement for an Arboricultural Method Statement to be prepared based on the detailed design and approved by the relevant planning authority where required under the DCO Requirements. Article 41 does not prevent the Local Planning Authority from making Tree Preservation Orders in the future. Rather, it provides that where works to trees subject to existing or future TPOs are reasonably necessary for the authorised development, those works benefit from deemed consent under the DCO. Requiring separate TPO consent would duplicate controls already established through the DCO and could impede the implementation and operation of the authorised	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		<u>In respect of works that are urgently required for safety reasons, the Council acknowledges that such works may need to be undertaken within the five working day notice period where there is an immediate risk of serious harm. In these circumstances, the responsibility should remain with the applicant to provide sufficient evidence demonstrating the condition of the tree and justifying why it was expedient and necessary to undertake the works without prior notice.</u> <u>Subject to the above recommendation regarding Conservation Area trees, the Council has no objection to the proposed notice provisions within Article 41.</u>	development notwithstanding the grant of development consent. The Applicant has included additional drafting in Article 41 requiring that notice of works to TPO must be provided to the relevant planning authority, in recognition of the Council's concerns. <u>The Applicant acknowledges Wiltshire Council's comments regarding the proposed notification provisions within Article 41, including the recommendation that the five working day notification requirement should also apply to trees within Conservation Areas that are subject to the notification requirements of Section 211 of the Town and Country Planning Act 1990.</u> <u>The Applicant's position is that the current drafting of Article 41 provides an appropriate and proportionate level of control and that no further amendments are considered necessary. Notwithstanding this</u>	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			<u>position, discussions with Wiltshire Council are continuing to explore whether any amendments to the drafting can be agreed. Subject to the outcome of those discussions, the Applicant will provide any agreed updates at Deadline 6. Until that time, this matter remains under discussion between the parties.</u>	
3.6.14	Article 40 - Schedule 12, Parts 1 and 2 of the draft DCO	<u>To provide additional reassurance regarding the maximum extent of hedgerow loss, Wiltshire Council considers that the undertaker should be permitted to remove only those lengths of hedgerow identified within the TPO and Hedgerow Removal Plans (Revision B) contained within the Outline Ecological Protection and Mitigation Strategy, July 2026 Revision 4 [REP4-056], where the limits of removal are clearly defined.</u> <u>Wiltshire Council notes that Schedule 12, Parts 1 and 2, currently refers to the removal of a "part" of particular hedgerows. In the interests of</u>	<u>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.</u> <u>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 current design. The maximum extent identifies the</u>	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		<u>precision, enforceability and avoiding uncertainty, the Council recommends that the specific lengths of hedgerow authorised for removal should be stated within the Schedule, replacing the generic term "part" with a quantified measurement (metres) corresponding to the approved plans.</u> <u>The stated measurements should represent the maximum extent of hedgerow removal authorised. However, they should not be interpreted as a requirement to remove the full specified length. Where detailed design, construction requirements, or site circumstances allow, the undertaker should seek to minimise impacts and retain greater lengths of hedgerow. Accordingly, removal of a lesser extent should always be considered and implemented where practicable, with the objective of avoiding unnecessary loss of hedgerow habitat and associated landscape, ecological and arboricultural value.</u>	<u>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.</u> <u>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.</u>	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		<u>This amendment would ensure that the authorised extent of hedgerow removal is clearly defined within the Order itself, providing certainty for all parties and ensuring that hedgerow losses cannot exceed those assessed within the Environmental Statement and secured through the ecological mitigation strategy.</u>		
<u>3.6.15</u>	<u>OOEMP, OCEMP</u>	<u>The Council remains concerned that the management plans and strategies do not provide sufficient detail regarding the monitoring, recording and reporting of impacts arising from the operation of the development upon retained trees, particularly Category A, Category B, Veteran and Ancient Trees. The development is proposed to operate for approximately 60 years and there remains potential for direct and indirect impacts to trees through changing site conditions, maintenance activities, access requirements, soil disturbance and cumulative operational effects.</u>	<u>The Applicant maintains that appropriate measures are already secured through the Development Consent Order and the certified management plans. During operation, the Applicant will continue to fulfil its duty of care as landowner and operator by undertaking appropriate inspection and management of trees where necessary to ensure their continued safety. However, the Applicant is of the view that a requirement to formally document and report routine monitoring findings to the Local Planning Authority throughout the operational life of the development would not be proportionate, particularly given the</u>	<u>Under Discussion</u>

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		<u>A formal monitoring, recording, and reporting mechanism is necessary to identify emerging impacts at an early stage and ensure appropriate intervention where adverse effects occur.</u> <u>The Council seeks inclusion of a requirement that:</u> <u>All trees, but particularly Category A, Category B, Veteran and Ancient Trees within, adjacent to, or potentially affected by the Order Limits are subject to periodic monitoring throughout the operational life of the development.</u> <u>Monitoring findings are documented and reported to the LPA.</u> <u>Monitoring identifies any deterioration attributable to the development and recommends appropriate corrective measures.</u> <u>Reports are submitted at agreed intervals and maintained as part of</u>	<u>nature of the Proposed Development and the controls already secured.</u> <u>The Applicant is currently considering Wiltshire Council's comments regarding operational monitoring and compensatory planting and discussions between the parties remain ongoing. Subject to the outcome of those discussions, the Applicant will provide any agreed amendments or further clarification at Deadline 6. Until that time, this matter remains under discussion between the parties.</u>	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		<u>the operational environmental management record.</u> <u>The loss of higher-value trees represents a significant environmental effect. Appropriate compensation can only be secured where sufficient detail and oversight are provided to ensure that replacement planting delivers meaningful landscape, ecological and arboricultural benefits. The Council remains concerned that sufficient control has not yet been secured regarding the details of mitigation and compensatory planting associated with the removal of Category A, Category B, Veteran and Ancient Trees.</u> <u>The Council seeks provisions requiring LPA approval of:</u> <u>• Tree species selection.</u> <u>• Planting sizes and specifications.</u> <u>• Planting locations.</u> <u>• Quantities and replacement ratios.</u>		

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		Establishment and maintenance regimes.		
3.6.16	ES Chapter 10 Arboriculture – Tree Survey	The Council questions the categorisation of a number of trees identified within the Order Limits identified as A1 which appear to have been downgraded from Veteran. The Council acknowledges that there is no single mandatory criterion for Veteran Tree classification and veteran status is determined through the presence of recognised veteran characteristics and habitat features. The characteristics described within the survey documentation, including age-related features, structural adaptation, deadwood habitat, cavities and veteran form, are commonly associated with Veteran trees, therefore Wiltshire Council requests that, until sufficient evidence is provided to say otherwise, a precautionary approach should be adopted and Category A1 trees treated as Veteran trees for impact assessment and mitigation purposes.	The Applicant does not agree that any trees have been downgraded from Veteran to Category A1. The arboricultural baseline information used to inform the Arboricultural Impact Assessment has been prepared in accordance with recognised industry guidance and standards, including BS 5837:2012 and relevant veteran tree guidance. Whilst some trees may exhibit individual characteristics that can be associated with veteran trees, the presence of isolated veteran characteristics does not, in itself, justify classification as a Veteran tree. Where the evidence is insufficient to support classification as a Veteran tree, the tree has been categorised in accordance with the criteria set out in BS 5837:2012. The Applicant therefore considers the tree categorisations presented within the application to be robust and	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			<u>appropriate for the purposes of the assessment.</u>	
<u>3.6.17</u>	<u>OCTMP Revision 4 [REP4-057]</u>	<u>The Council continues to seek clarification and certainty regarding the future use of the access track at North Bincombe Wood.</u> <u>The Council would like to see the inclusion of wording confirming that:</u> <u>"The access track at North Bincombe Wood shall be used solely for monitoring and maintenance activities associated with the adjacent hedgerow / maintenance and for no other operational or maintenance purpose."</u> <u>This would provide certainty regarding the scope of future usage and minimise the risk of incremental impacts on adjacent woodland, trees and habitats.</u>	<u>The Applicant acknowledges Wiltshire Council's proposed wording relating to additional restrictions on the use of the existing access track adjacent to North Bincombe Wood. The Applicant is currently reviewing the proposed drafting and discussions with Wiltshire Council remain ongoing. Subject to the outcome of those discussions, the Applicant intends to provide updated wording for consideration at Deadline 6. Until that time, this matter remains under discussion between the parties.</u>	<u>Under Discussion</u>
<u>3.6.18</u>	<u>OLEMP</u>	<u>The Council considers that greater certainty is required regarding professional competence of the Arboricultural Clerk of Works. Given the sensitivity of the affected tree</u>	<u>The Applicant confirms that the appointed ACoW will be a suitably qualified and experienced arboricultural professional with the necessary competence to undertake the role.</u>	<u>Under Discussion</u>

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		<u>resource, assurance is required that suitably qualified and experienced personnel oversee works with potential arboricultural implications.</u> <u>The Council seek a commitment that the following information is submitted to and approved by the LPA prior to commencement of relevant works:</u> <u>oThe name of the appointed ACoW.</u> <u>oRelevant qualifications.</u> <u>oProfessional memberships.</u> <u>oDemonstrable experience of working with veteran and ancient trees.</u>	<u>including appropriate experience of supervising works in the vicinity of retained trees where required. The Applicant considers that this provides an appropriate level of assurance regarding professional competence.</u> <u>However, the Applicant does not consider it proportionate or necessary for the Local Planning Authority to approve the appointment of the Applicant's contractor or specialist personnel, including the ACoW, as this relates to the Applicant's choice of suitably competent contractor rather than the adequacy of the mitigation secured through the Development Consent Order. The Applicant therefore considers that the current drafting provides an appropriate level of control.</u>	

3.7 Hydrology, Flood Risk and Drainage

Table 3-7: Hydrology, Flood Risk and Drainage

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
3.7.1	Legislation and Policy	<u>Wiltshire Council acknowledges that the Applicant has identified the relevant national and local policy and legislative framework, including the NPPF, Wiltshire Local Plan Policies 95 and 96, the Wiltshire Strategic Flood Risk Assessment (SFRA) and relevant LLFA guidance. The remaining issue is not the identification of the applicable policy framework, but demonstrating how the measures relied upon to achieve compliance with these requirements will be secured, implemented, monitored, maintained and reviewed throughout the lifetime of the Scheme. While the Applicant has identified a range of mitigation, management and control measures, the LLFA considers that further confidence is required regarding the governance, monitoring, maintenance, reporting and assurance arrangements that will ensure their continued effectiveness over time. The LLFA</u>	The Applicant confirms that the relevant legislative and policy framework has been identified and applied within ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP3-015] and the ES Volume 3, Appendices 11-1 [REP3-039] to 11-9: Flood Risk Assessment and Drainage Strategy [REP1-038 to REP1-054]. The Applicant does not agree that acceptance of policy context is dependent on further field-scale hydrological modelling of solar panelled areas as set out in the correspondence provided in Applicant's Response to Lead Local Flood Authority on Hydraulic Modelling Requirements' (Rev 1) [REP2-045]. The policy requirement is for a proportionate assessment that demonstrates the Scheme would be safe, would not increase flood risk elsewhere and would include appropriate surface	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		<u>therefore seeks greater clarity regarding how the management framework will provide ongoing assurance that flood risk, drainage, water resources and SFRA objectives continue to be achieved throughout all phases of the Scheme.</u> <u>Remaining Ask: Demonstrate how the measures relied upon to achieve compliance with flood risk, drainage, water resources and SFRA objectives will be secured and managed throughout the lifetime of the Scheme, including arrangements for monitoring, maintenance, reporting, governance, assurance, performance review and adaptive management where necessary.</u> <u>Wiltshire Council confirms that the Flood Risk Assessment and Drainage Strategy documents (ES Volume 3, Appendices 11-1 to 11-9 [APP-210 to APP-218]) reference relevant national and local planning policy, including the NPPF (2023) and Wiltshire Local Plan Policy 95 (Flood Risk) and Policy 96 (Water Resources). Whilst the</u>	water management. That has been provided through the submitted ES, FRA and Drainage Strategy suite, targeted hydraulic modelling and secured drainage controls. <u>The Applicant is continuing to engage with Wiltshire Council regarding the matters raised. An updated position will be provided at Deadline 6.</u>	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		identification of the policy framework is acknowledged, agreement on policy compliance does not extend to acceptance of the assessment outcomes. The LLFA considers that the application does not yet demonstrate, with sufficient clarity, how the proposed approach aligns with the Wiltshire Strategic Flood Risk Assessment (SFRA), particularly in relation to local catchment characteristics and hydrological response. Further confidence is required to demonstrate that policy requirements relating to runoff management, exceedance routing and long-term drainage performance are being met in practice, rather than referenced at a high level. Accordingly, the LLFA position remains that further clarification and/or supporting evidence is required before agreement can be reached. This includes demonstrating that the proposed approach is appropriate to the scale and nature of the		

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		development within its wider catchment context.		
3.7.2	Sequential Test	Wiltshire Council confirm the sequential and exception tests appear to have been applied correctly, with solar PV panels and substations located in Flood Zone 1, wherever feasible. Wiltshire Council note that the consideration of wider alternative sites and the application of the Sequential Test are matters of planning judgement, informed by flood risk evidence, and not matters for determination through technical drainage assessment.	The Applicant welcomes Wiltshire Council's acknowledgement that the Sequential and Exception Tests appear to have been applied correctly. The Sequential and Exception Tests are set out in the Planning Statement [REP3-081] and ES Volume 3, Appendix 11-1: Flood Risk Assessment and Drainage Strategy Covering Report [REP3-039]. The design applies the sequential approach by locating substations, BESS and other more flood-sensitive infrastructure in areas of lowest flood risk where practicable. Limited interaction between solar PV panels and mapped flood extents is assessed in the site-specific FRA appendices.	Agreed
3.7.3	Climate Change	Wiltshire Council confirm compliance with climate change allowances (+71% flow uplift for 2080s) is demonstrated using Manning's calculations and NaFRA2 mapping.	The Applicant confirms that the assessment applies the Environment Agency upper end climate change allowances, including +71% flow uplift for the 2080s epoch where relevant, as set out within ES Volume 1, Chapter	Agreed

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			11: Hydrology, Flood Risk and Drainage [REP3-015] and the site-specific FRA appendices. The approach accords with national guidance.	
3.7.4	SuDS and SFRA Linkage	<u>Wiltshire Council accepts that the Scheme relies upon a combination of formal drainage infrastructure and non-structural SuDS measures. The remaining issue is not whether such measures are proposed, but demonstrating clearly which measures are relied upon to manage runoff and support the Scheme's flood risk and drainage conclusions, how they align with Wiltshire SFRA objectives, Wiltshire LLFA SuDS guidance and greenfield runoff principles, and how their implementation and ongoing effectiveness will be secured, maintained and reviewed throughout the lifetime of the Scheme. The LLFA considers that further clarity is required regarding the role, function, management and long-term performance of these measures within the overall flood risk and drainage</u>	The Applicant agrees that clearer cross-reference to Wiltshire Council's SFRA Level 1 and emerging SuDS SPD is appropriate. ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP3-015] and ES Volume 3, Appendix 11-1: Flood Risk Assessment and Drainage Strategy Covering Report 1 [REP3-039] were updated at Deadline 1 to strengthen signposting. The Applicant is preparing further drainage strategy clarification for Deadline 4 (ES Volume 3, Appendices 11-1 to 11-8: Flood Risk Assessment and Outline Drainage Strategies (Rev 4) [EN010168/APP/6.3]) to distinguish between formal drainage areas, where runoff is attenuated and controlled, and the wider solar PV panelled areas, which remain predominantly vegetated	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		<u>strategy, including how their contribution to runoff management and flood risk outcomes will be maintained over time.</u> <u>Remaining Ask: Demonstrate which non-structural SuDS and runoff-management measures are relied upon by the Scheme, the flood risk, SFRA and SuDS objectives they support, where they are secured within the management framework, and how their implementation, monitoring, maintenance, performance review and effectiveness will be maintained throughout the operational lifetime of the Scheme.</u> Wiltshire Council acknowledges that the Applicant has set out a drainage strategy and identified a range of measures intended to manage surface water runoff. However, the LLFA considers that further clarity is required to demonstrate how these measures operate collectively to control runoff across the site, including panelled areas, access tracks and associated infrastructure. In particular, the	and permeable. This clarification does not alter the technical conclusions on flood risk or drainage performance. <u>The Applicant is continuing to engage with Wiltshire Council regarding the matters raised. An updated position will be provided at Deadline 6.</u>	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		application does not yet provide sufficient confidence that runoff behaviour, including generation, routing and attenuation, has been appropriately assessed in a way that reflects how the site functions as a connected drainage system. Further evidence is required to demonstrate that the proposed measures will function effectively under a range of conditions, including adverse scenarios, and that performance can be maintained over the lifetime of the development. Accordingly, the LLFA position remains that further clarification and/or supporting evidence is required before agreement can be reached.		
3.7.5	Assessment Methodology	<u>Wiltshire Council acknowledges that the Applicant has set out an assessment methodology aligned with relevant Environment Agency guidance and supported by appropriate datasets, evidence sources and analytical tools. The LLFA broadly accepts the assessment methodology and considers that the additional</u>	The Applicant notes Wiltshire Council's acknowledgement that the assessment methodology aligns with Environment Agency guidance and uses appropriate datasets and analytical tools, including Flood Map for Planning, NaFRA2, LiDAR analysis and conservative assumptions. The Applicant agrees that datasets and analytical tools alone	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		<u>information submitted during the Examination has assisted in explaining the basis of the assessment and supporting the conclusions reached. The remaining issue is not the assessment methodology itself, but demonstrating how the soil, vegetation and land-management measures relied upon within the assessment will be secured, implemented, monitored, maintained and, where necessary, adapted throughout the lifetime of the Scheme. As the assessment relies upon the ongoing condition and performance of these measures, the LLFA seeks further confidence that an appropriate management, monitoring and assurance framework is in place to support the assumptions underpinning the assessment and maintain the flood risk and drainage outcomes upon which the assessment conclusions are based.</u> <u>Remaining Ask: Demonstrate how the soil, vegetation and land-management assumptions relied upon by the assessment will be secured, monitored, maintained and, where necessary,</u>	would not demonstrate flood risk outcomes. However, that is not the Applicant's assessment approach. The flood risk outcomes for the Scheme are demonstrated through a proportionate, risk-led assessment framework. Fluvial flood risk is assessed using Environment Agency mapping, targeted hydraulic modelling where justified, and Manning's / open-channel checks for smaller ordinary watercourses where appropriate, noting the Environment Agency's response to ExQ FHW1.4 and FHW1.5 that the Manning's assessment provides useful information on relative water level change and supports the proportionality of using RoFSW mapping for smaller ordinary watercourses and drainage ditches not covered by the Flood Map for Planning, as recorded in Applicant's Response to Other Parties' Responses to the Examining Authority's First Written Questions [EXAM/9.29]. Surface water drainage from genuinely impermeable or engineered infrastructure, including substations,	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		<u>adapted throughout the lifetime of the Scheme, including arrangements for monitoring, reporting, governance, performance review, corrective action and adaptive management.</u> Wiltshire Council acknowledges that the Applicant has set out an assessment methodology aligned with relevant Environment Agency guidance and supported by appropriate datasets and analytical tools. However, the LLFA considers that alignment of datasets and tools alone does not provide sufficient confidence that hydrological processes and flood risk outcomes have been fully understood for this development. In particular, the LLFA considers that further clarity is required to demonstrate that the methodology adequately captures key site-specific hydrological processes, including runoff generation, redistribution, connectivity and interaction between panelled areas, infrastructure and receiving drainage features. The LLFA notes the Applicant's position that hydrological behaviour within panelled areas is	BESS, hardstanding and formal access areas where required, is assessed quantitatively through greenfield runoff calculations, attenuation and controlled discharge. Floodplain interaction and displacement have been assessed where relevant. Construction-phase risks are controlled through secured management measures. The Applicant does not agree that a further field-scale quantitative hydrological assessment of solar panelled areas is required to demonstrate flood risk outcomes as previously explained in the evidence base presented in the Applicant's Response to Lead Local Flood Authority on Hydraulic Modelling Requirements [REP2-045]. Solar PV panels are elevated above ground, drain to the existing ground, are not sealed into a drainage network and do not create a connected impermeable drainage catchment. The principal surface water risk pathway for panelled areas is the condition of the ground beneath and between the arrays, including soil compaction, vegetation	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		influenced by management-dependent variables. However, the application does not yet demonstrate, with sufficient evidence, how these variables will be controlled and how their combined effect on runoff behaviour and flood risk will be reliably understood over the lifetime of the development. Accordingly, the LLFA considers that the current methodology does not yet provide sufficient confidence that surface water runoff processes and flood risk outcomes have been robustly assessed, and further clarification and/or supporting evidence is required before agreement can be reached.	cover, surface roughness and flow connectivity. These are management-dependent variables, not fixed drainage design parameters. The specific processes identified by the LLFA are already addressed through the assessment and secured mitigation framework. Panel row hydrology is addressed by recognising that panels redistribute rainfall locally but do not create a connected impermeable catchment. Access track effects are addressed through permeable track design, at-grade construction and cross-drainage where required. Construction-phase soil compaction is addressed through construction traffic management, low-ground-pressure working, restricted trafficking routes and post-construction remediation. Cumulative catchment connectivity is addressed by preserving existing overland flow routes and avoiding new preferential flow connections. SuDS inflows and exceedance routing are addressed for the formal drainage systems serving genuinely	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			impermeable or engineered infrastructure. A further field-scale quantitative assessment of panelled areas would require assumed values for runoff coefficients, infiltration rates, roughness, compaction, construction condition, reinstatement condition and hydraulic connectivity across the operational lifetime of the Scheme. Those are future management variables, not fixed design parameters. Such an assessment would not materially improve the understanding of flood risk outcomes beyond securing and enforcing the controls that manage the actual runoff mechanisms. The relevant controls are secured through the Outline CEMP [REP3-092], Outline SRMP [REP3-098], Outline LEMP [REP3-100], Outline OEMP [REP3-094] and the relevant DCO Requirements. The Applicant therefore considers that the methodology demonstrates the relevant flood risk outcomes for the	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			Scheme and remains robust, proportionate and policy-compliant. <u>The Applicant is continuing to engage with Wiltshire Council regarding the matters raised. An updated position will be provided at Deadline 6.</u>	
3.7.6	Cumulative Assessment & Temporary Works	<u>Wiltshire Council acknowledges that the Applicant has assessed potential cumulative flood risk, runoff and water environment effects arising from the Scheme and has identified a range of mitigation, management and control measures intended to avoid or minimise adverse effects. The LLFA broadly accepts that the principal sources of flood risk and runoff generation have been identified. The remaining issue is not the cumulative assessment methodology itself, but demonstrating how the numerous activities, management measures and environmental controls occurring across the Solar PV Sites and Cable Route Corridor will operate collectively to ensure that the assumptions and conclusions of the assessment remain</u>	The Applicant does not agree that further field-scale quantitative hydrological assessment of temporary construction-phase effects is required or proportionate to assess cumulative surface water and flood risk effects from the combined construction of the Solar PV Sites and Cable Route Corridor. Construction-phase effects from the Solar PV Sites and Cable Route Corridor have been assessed within ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP3-015] and ES Volume 3, Appendix 11-1 [REP3-039] to 11-9: Flood Risk Assessment and Drainage Strategy [REP1-038 to REP1-054], including ES Volume 3, Appendix 11-9: Flood Risk Assessment and Drainage	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		<u>valid throughout the lifetime of the Scheme.</u> <u>The LLFA considers that flood risk outcomes are influenced by the cumulative interaction of a wide range of activities, including construction runoff management, soil handling and restoration, compaction management, vegetation establishment and maintenance, drainage installation and maintenance, watercourse crossing activities, cable route works, temporary works, land management and operational maintenance activities. The LLFA therefore seeks further confidence that these activities have been considered collectively within the management framework, and that suitable arrangements are in place to monitor performance, identify emerging issues and implement corrective actions where necessary.</u> <u>Remaining Ask: Demonstrate how the mitigation, management and control measures relied upon to avoid or minimise cumulative flood risk, runoff, erosion, sediment and water-quality</u>	Strategy Cable Route Corridor [REP1-054]. The assessment considers the relevant construction-phase risk pathways, including temporary disturbance, soil compaction, bare ground, preferential flow connectivity, works near watercourses, temporary compounds, access tracks and cable installation works. The Applicant does not accept that the development of detailed construction-phase controls post-consent represents an evidential gap. It is standard and appropriate for temporary works controls to be finalised once the contractor, construction sequencing, plant, weather constraints, working areas and detailed methods are known. The Application does not defer the assessment of construction-phase risk. It identifies the relevant risk pathways and secures the controls that will manage them. The LLFA's suggested field-scale quantitative assessment would require assumptions about temporary construction behaviour, soil condition, compaction, trafficking,	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		<u>effects across the Scheme will be implemented, coordinated, monitored, maintained and reviewed throughout the relevant phases of development, including arrangements for governance, monitoring, reporting, performance review and corrective action where issues are identified.</u> Wiltshire Council considers that the assessment does not yet provide sufficient confidence in how cumulative surface water and flood risk effects arising from the combined construction of the Solar PV Sites and the Cable Route Corridor have been characterised. The LLFA acknowledges that the Applicant has identified relevant construction-phase risk pathways and proposes to manage these through secured mitigation measures. However, the application does not yet clearly demonstrate how the combined effects of temporary disturbance, soil compaction, temporary drainage measures, access routes and construction activities will interact across the site and within the wider catchment. In particular, further	temporary drainage layouts, sequencing, rainfall timing and reinstatement across the full construction programme. These are not fixed design parameters. Such an assessment would therefore be driven by assumed temporary construction conditions rather than by defined permanent drainage features. It would not materially improve the assessment beyond securing and enforcing the measures that control the actual risk mechanisms. The explicit worst case for the assessment is the construction envelope assessed in the ES, including the Solar PV Sites, Cable Route Corridor, temporary compounds, access routes, construction activities and embedded mitigation secured through the DCO. The Applicant does not consider that an unmanaged construction scenario, with no CEMP, no soil controls, no temporary drainage controls and no reinstatement, is a realistic or policy-required worst case. Construction-phase runoff, sediment, compaction and watercourse	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		clarity is required to demonstrate how cumulative hydrological responses, including runoff generation, routing, connectivity and potential flow concentration, have been considered across the construction envelope, rather than as individual or isolated effects. The LLFA notes the Applicant's position that construction phase behaviour is influenced by variable and management-dependent factors. However, the application does not yet provide sufficient evidence to demonstrate how these factors will be consistently controlled in practice, or how their combined effect on runoff behaviour and flood risk will be understood across a range of conditions. The LLFA also considers that further confidence is required that an appropriate worst case construction scenario has been defined and assessed to ensure that potential flood risk effects are robustly understood. Accordingly, the LLFA position remains that further clarification and/or supporting evidence is required before agreement can be reached.	interaction risks are controlled through the Outline CEMP [REP3-092] and Outline SRMP [REP3-098], temporary drainage measures, pollution prevention measures, watercourse buffers, construction sequencing, weather-responsive working practices, soil reinstatement and the relevant DCO Requirements. Where the Scheme creates genuinely impermeable or engineered infrastructure, quantitative drainage design has been undertaken. Where temporary construction activities create short-term runoff, sediment or compaction risk, the appropriate response is secured construction management, not a field-scale quantitative assessment of speculative temporary conditions. The Applicant therefore considers that cumulative construction-phase surface water and flood risk effects have been appropriately assessed and controlled, and that residual effects remain Negligible to Low following embedded mitigation.	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			<u>The Applicant is continuing to engage with Wiltshire Council regarding the matters raised. An updated position will be provided at Deadline 6.</u>	
3.7.7	Residual Effects	<u>Wiltshire Council broadly accepts the Applicant's assessment of residual effects. However, confidence in the residual flood risk and water quality conclusions is dependent upon the successful implementation, monitoring, maintenance and ongoing effectiveness of the runoff-management, soil-management, vegetation-management and pollution-control measures relied upon by the Scheme. The remaining issue is therefore not the residual effects assessment itself, but demonstrating that an appropriate monitoring, reporting and assurance framework is in place to identify deterioration in performance, ensure timely intervention where necessary and maintain the effectiveness of these measures throughout the lifetime of the Scheme.</u>	The Applicant does not agree that residual flood risk effects remain uncertain or that further field-scale quantitative hydrological assessment is required. Residual flood risk has been assessed within ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP3-015] and the ES Volume 3, Appendix 11-1 [REP3-039] to 11-9: Flood Risk Assessment and Drainage Strategy [REP1-038 to REP1-054]. Quantitative assessment has been undertaken where the relevant mechanism requires it, including targeted hydraulic modelling, Manning's calculations for smaller ordinary watercourses, floodplain interaction assessment, and formal drainage design for genuinely impermeable infrastructure.	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		<u>Remaining Ask:</u> <u>Provide a monitoring and assurance framework demonstrating how residual flood risk and water quality effects will be monitored, reported, reviewed and managed throughout the lifetime of the Scheme, including monitoring parameters, performance indicators, intervention thresholds, responsibilities, reporting arrangements, corrective actions, escalation procedures, governance mechanisms and arrangements for periodic performance review where necessary</u> Wiltshire Council notes the conclusions presented within the Flood Risk Assessment regarding residual effects. However, the LLFA cannot yet confirm that residual flood risk effects would be negligible, as the application does not provide sufficient confidence that runoff behaviour, including rates, volumes and downstream interactions, has been fully understood across the site. The LLFA acknowledges that the Applicant has identified relevant risk pathways and proposes to manage these through a secured mitigation and management	For impermeable or engineered infrastructure, including substations, BESS, formal hardstanding and access tracks where required, runoff rates and volumes are controlled through attenuation and restricted discharge. This demonstrates that the Scheme would not materially increase downstream flood risk. For solar PV panelled areas, the relevant residual risk pathway is soil condition, compaction, vegetation cover, surface roughness and hydraulic connectivity. These are management-dependent variables, not fixed drainage design parameters. They are controlled through the secured mitigation framework, including the Outline CEMP [REP3-092], Outline SRMP [REP3-098], Outline LEMP [REP3-100], Outline OEMP [REP3-094] and the relevant DCO Requirements. The Applicant does not accept that further field-scale quantitative assessment of these management-dependent variables would provide a more reliable assessment of residual effects. Such an assessment would	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		framework. However, further clarity is required to demonstrate how these measures will operate collectively to control residual risk, taking into account the interaction between panelled areas, infrastructure and receiving drainage features. In particular, the application does not yet demonstrate, with sufficient evidence, how residual effects will be controlled under a range of conditions over the lifetime of the development. The LLFA also considers that further confidence is required that an appropriate worst case scenario has been defined and assessed to ensure that potential residual flood risk effects are robustly understood. Accordingly, the LLFA considers that residual effects remain uncertain at this stage, and further clarification and/or supporting evidence is required before agreement can be reached.	necessarily rely on assumed values for future soil compaction, infiltration, roughness, vegetation condition and connectivity over the operational lifetime of the Scheme. The appropriate and enforceable response is to secure the measures that control those variables. The Applicant also does not accept that an unmanaged construction scenario should be treated as the explicit worst case. The assessed worst case is the construction and operational envelope reported in the ES, with embedded mitigation secured through the DCO. A scenario that assumes no CEMP, no soil controls, no temporary drainage controls and no reinstatement would not be a realistic or policy-required basis for assessment. The Applicant therefore maintains that residual flood risk effects have been appropriately characterised and remain Negligible to Low following embedded mitigation. Further field-scale quantitative hydrological assessment of panelled areas is not necessary to demonstrate no material increase in runoff rates,	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			runoff volumes or downstream flood risk. <u>The Applicant is continuing to engage with Wiltshire Council regarding the matters raised. An updated position will be provided at Deadline 6.</u>	
3.7.8	Watercourse Easements	<u>Wiltshire Council accepts the principle of watercourse buffers, drainage corridors and maintenance access provisions adjacent to watercourses. The remaining issue is not the provision of these corridors in principle, but demonstrating how they will be protected, managed and maintained to ensure continued access for inspection and maintenance, prevent encroachment and support the long-term function of watercourses and associated drainage features throughout the lifetime of the Scheme. While the LLFA acknowledges that relevant protections are secured through the DCO, including drainage authority protective provisions and maintenance obligations, further clarity is required regarding the practical management, monitoring and</u>	Appropriate stand-offs and buffers to Main Rivers and Ordinary Watercourses are embedded within the design principles and secured through the Outline CEMP [REP3-092] and DCO Requirements. The Applicant considers that sufficient control is secured through the submitted application documents, with location-specific buffers and protection measures to be confirmed through detailed design and the detailed CEMP where required. <u>The Applicant is continuing to engage with Wiltshire Council regarding the matters raised. An updated position will be provided at Deadline 6.</u>	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		<u>maintenance arrangements that will ensure these corridors remain effective throughout the lifetime of the Scheme.</u> <u>Remaining Ask: Demonstrate how watercourse buffers, maintenance access routes and drainage corridors will be protected, managed and maintained throughout the lifetime of the Scheme, including arrangements for inspection, maintenance access, vegetation management, protection from obstruction or encroachment, monitoring, reporting and the maintenance of long-term watercourse and drainage function.</u> Wiltshire Council considers that there is a need to strengthen the commitment to maintain appropriate easements and stand-offs to watercourses. The LLFA acknowledges that buffers and stand-offs are referenced within the design principles and secured through outline management plans. However, further clarity is required to demonstrate how these will be consistently applied and maintained across the site. In particular, sufficient confidence has not		

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		yet been provided that appropriate easements will be retained to allow for access, maintenance, flow conveyance and to avoid constraining natural drainage processes. Accordingly, the LLFA considers that further clarification is required to demonstrate that watercourse buffers are appropriately defined and secured to ensure that flood risk and drainage function are not adversely affected.		
3.7.9	HDD Commitments	<u>Wiltshire Council broadly supports the proposed use of HDD at sensitive crossings. The remaining issue is not the use of HDD in principle, but demonstrating how crossing methodologies will be selected and how hydrological, hydrogeological and water environment risks will be identified, assessed and managed on a site-specific basis. The LLFA therefore seeks greater clarity regarding the decision-making framework for selecting HDD or alternative crossing methods, the circumstances in which each approach would be appropriate, and the measures that will be applied to avoid, minimise and manage</u>	The Applicant agrees that trenchless techniques, including HDD, are an appropriate means of reducing surface disturbance at sensitive watercourse crossings where their use is justified. The use of trenchless techniques is proposed at Main River crossings and other sensitive locations where this is required to avoid direct disturbance to watercourses, floodplains, riparian habitats or other identified receptors. Open-cut methods may remain appropriate for minor drains or ordinary watercourses where the crossing can be undertaken safely, temporarily and without material flood risk, drainage,	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		<u>potential flood risk and water environment effects at sensitive crossings.</u> <u>Remaining Ask:</u> <u>Demonstrate the criteria and decision-making process for selecting HDD and alternative crossing methodologies, and explain how hydrological, hydrogeological and water environment risks will be identified, assessed and managed at sensitive crossings, including the application of mitigation measures, contingency arrangements and any site-specific monitoring or approval requirements where appropriate.</u> Wiltshire Council recognises that the use of trenchless techniques, including horizontal directional drilling (HDD), can reduce surface disturbance and associated surface water flood risk and geomorphological impacts at sensitive watercourse crossings. The LLFA also notes that trenchless techniques can interact with subsurface hydrological conditions, including groundwater pathways, Source Protection Zones and hydraulic connectivity, particularly	groundwater or geomorphological effect. The Applicant acknowledges that trenchless techniques can interact with subsurface hydrological conditions, including local groundwater pathways, Source Protection Zones and hydraulic connectivity at watercourse crossings. These risks will be addressed through location-specific assessment and construction controls, including the detailed CEMP, trenchless drilling management plans, drilling fluid controls, breakout contingency procedures, pollution prevention measures and, where required, Water Features Surveys and Hydrogeological Risk Assessment. The relevant controls are secured through the Outline CEMP [REP3-092], the detailed CEMP and the relevant DCO Requirements. The final crossing methodology will be confirmed at detailed design stage. <u>The Applicant is continuing to engage with Wiltshire Council regarding the matters raised. An updated position will be provided at Deadline 6.</u>	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		within watercourses and floodplain environments. While the Applicant has identified that HDD will be used at sensitive locations where appropriate, further clarity is required to demonstrate how crossing methods will be selected across the Scheme, and how potential risks associated with both trenchless and open-cut techniques will be consistently assessed and managed. In particular, sufficient confidence has not yet been provided to demonstrate that location-specific hydrological and hydrogeological risks will be fully understood and controlled for all watercourse crossings, including where alternative installation methods may be proposed. Accordingly, the LLFA considers that further clarification is required to demonstrate how appropriate crossing methods, assessment and construction controls will be applied to ensure that flood risk, drainage function and subsurface hydrological processes are not adversely affected.		

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
3.7.10	Draft DCO - HDD Approval	<u>Wiltshire Council recognises that the DCO, CEMP and associated management plans provide a framework for the approval and control of HDD and other crossing methodologies. The remaining issue is not whether such controls exist, but demonstrating how sensitive crossings will be identified, how crossing-specific risks will be evaluated, and how HDD designs, crossing risk assessments, construction methodologies and mitigation measures will be reviewed and approved through the DCO and management-plan framework. The LLFA therefore seeks greater clarity regarding the approval process, responsibilities and decision-making framework that will apply to sensitive crossings, including where relevant the drainage authority protective provisions.</u> <u>Remaining Ask</u> <u>Demonstrate how sensitive crossings will be identified and assessed, and how HDD designs, crossing risk assessments, construction methodologies and mitigation</u>	Detailed HDD design and methodology will be controlled through the detailed CEMP and associated method statements secured under the draft DCO Requirements prior to commencement of the relevant stage. The Applicant considers that the existing Requirements provide appropriate control without the need for additional bespoke provisions. <u>The Applicant is continuing to engage with Wiltshire Council regarding the matters raised. An updated position will be provided at Deadline 6.</u>	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		<u>measures will be reviewed, approved and implemented through the DCO and associated management-plan framework, including the roles of relevant authorities and any applicable drainage authority approval processes.</u> Wiltshire Council considers that further confidence is required that the detailed design and methodology for HDD watercourse crossings will be subject to appropriate review and approval prior to implementation. The LLFA acknowledges the Applicant's position that HDD design and construction controls will be secured through the detailed CEMP, associated method statements and relevant DCO Requirements. However, further clarity is required regarding how location-specific hydrological, hydrogeological, flood risk and watercourse considerations will be assessed and approved before works commence. In particular, the LLFA considers that sufficient assurance has not yet been provided that HDD proposals at sensitive watercourse crossings will be subject to an appropriate level of		

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		scrutiny to ensure that flood risk, drainage function, groundwater pathways and hydraulic connectivity are not adversely affected. Accordingly, the LLFA considers that further clarification is required regarding the approval mechanism for detailed HDD crossing designs and methodologies before agreement can be reached.		
3.7.11	Draft DCO - GIS Mapping	<u>Wiltshire Council accepts that sufficient flood risk, drainage and water environment mapping has been provided for the purposes of the Examination. The remaining issue relates to how spatial information on drainage assets, watercourses, buffers, mitigation measures and monitoring requirements will be recorded, maintained and utilised during detailed design, implementation and long-term management of the Scheme. The LLFA therefore seeks greater clarity regarding the scope, accessibility and intended operational use of GIS-based information to support the effective management of flood risk, drainage</u>	ES Volume 3, Appendix 11-1 [REP3-039] to 11-9: Flood Risk Assessment and Drainage Strategy [REP1-038 to REP1-053] include mapping derived from the Environment Agency datasets and site-specific analysis sufficient for Examination. GIS data can be provided to the LLFA to support review at detailed design stage where reasonably required. <u>The Applicant is continuing to engage with Wiltshire Council regarding the matters raised. An updated position will be provided at Deadline 6.</u>	<u>Agreed in Principle</u> <u>Under Discussion</u>

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		<u>and water environment assets throughout the lifetime of the Scheme.</u> <u>Remaining Ask: Clarify the availability, content and intended use of GIS-based information to support detailed design, asset management, inspection, maintenance, monitoring and future management activities throughout the lifetime of the Scheme, including how such information will be kept up to date and used to support the implementation and review of flood risk, drainage and water environment management measures.</u> Wiltshire Council considers that GIS-based spatial mapping would provide additional clarity regarding the interaction between the Scheme layout, flood risk constraints, drainage features, watercourses, crossing locations and associated mitigation measures. The LLFA notes that flood risk and drainage mapping has been provided within the application documentation. However, GIS-based mapping would assist the review of detailed design		

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		information by providing a consistent spatial representation of flood risk, drainage and water environment constraints across the Scheme. This could include the integration of flood risk extents, surface water flow routes, watercourses, crossing locations, drainage assets, easements, buffers and mitigation measures within a single spatial framework. The LLFA considers that GIS-based mapping would support the interpretation, review, management and future maintenance of flood risk and drainage information throughout the construction and operational life of the development, particularly where multiple plans, constraints and management measures are required to be considered together. Accordingly, the LLFA requests further consideration of how GIS-based mapping could be made available to support detailed design review and the ongoing management of flood risk and drainage matters.		

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
3.7.12	Draft DCO - SuDS Guidance	<u>Wiltshire Council broadly accepts the Scheme's runoff-management approach and the Applicant's reliance on a combination of drainage infrastructure and non-structural SuDS measures. The remaining issue relates to demonstrating how the SuDS principles and runoff-management measures underpinning the Scheme's flood risk and drainage conclusions are translated into practical management, monitoring, maintenance and operational procedures throughout the lifetime of the Scheme. The LLFA therefore seeks greater clarity regarding how the proposed SuDS measures and runoff-management principles will be implemented, monitored, maintained and reviewed to ensure their continued effectiveness and contribution to the Scheme's flood risk and drainage objectives over time.</u> <u>Remaining Ask: Demonstrate how the SuDS principles and runoff-management measures underpinning the Scheme are incorporated within the management framework and translated</u>	ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP3-015] and ES Volume 3, Appendix 11-1: Flood Risk Assessment and Drainage Strategy - Covering Report [REP3-039] already limit runoff from formal drainage areas in accordance with greenfield principles and Wiltshire Council LLFA guidance. The Applicant is preparing a further drainage strategy clarification for Deadline 4 to make this position clearer and to strengthen cross-reference to Wiltshire Council SuDS guidance where required (ES Volume 3, Appendices 11-1 to 11-8: Flood Risk Assessment and Outline Drainage Strategies (Rev 4) [EN010168/APP/6.3]). The drainage strategy already limits runoff rates in accordance with greenfield principles and the drainage hierarchy. <u>The Applicant is continuing to engage with Wiltshire Council regarding the matters raised. An updated position will be provided at Deadline 6.</u>	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		<u>into practical monitoring, maintenance, inspection, review and corrective-action procedures throughout the lifetime of the Scheme, including how their ongoing effectiveness will be maintained, assessed and, where necessary, adapted over time.</u> Wiltshire Council considers that the application should clearly demonstrate how Wiltshire Council LLFA guidance relating to SuDS design, runoff management and drainage principles has informed the development of the drainage strategy. The LLFA acknowledges the Applicant's position that runoff from formal drainage areas will be managed in accordance with greenfield principles and the drainage hierarchy. However, further clarity is required regarding how Wiltshire Council LLFA guidance has been applied across the Scheme and how compliance with the relevant principles will be maintained through detailed design and implementation. In particular, the LLFA would welcome further information demonstrating how		

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		runoff rates, runoff volumes and flow pathways have been considered across both formal drainage infrastructure and panelled areas, together with an explanation of how the proposed drainage approach accords with Wiltshire Council guidance and greenfield runoff principles. The LLFA also considers that further clarity would be beneficial regarding the inspection, management and remediation measures proposed to maintain soil condition, infiltration capacity and drainage performance throughout construction and operation. Accordingly, the LLFA considers that further clarification is required to demonstrate how Wiltshire Council LLFA guidance and relevant SuDS principles have been incorporated within, and will continue to inform, the detailed design, implementation and long-term management of the Scheme.		
3.7.13	Draft DCO - OCEMP Protocols	The outline Construction Environmental Management Plan (7.12) [APP-277] includes flood risk protocols, but	The Outline CEMP [REP3-092] has been updated to provide additional clarity on flood risk emergency	Agreed

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		explicit reference to EA Floodline registration for maintenance teams is required. The flood risk emergency protocols should also be detailed.	response procedures, including signing up to the EA's Floodline.	
3.7.14	Draft DCO - Floodplain Compensation	Wiltshire Council requests explicit reference to floodplain compensation principles, even where impacts are assessed as negligible, for transparency. The LLFA considers it important that this conclusion is clearly articulated in the application documents, including an explanation of the basis on which compensatory storage is not required, in order to provide clarity for decision makers and stakeholders. On this basis, the matter remains under discussion pending confirmation that appropriate explanatory wording is included.	The Applicant notes Wiltshire Council's request for clear explanation of the floodplain compensation position. Floodplain compensation in relation to Main River fluvial floodplain storage is principally a matter for the Environment Agency as the relevant technical consultee, and this matter is being addressed through the Environment Agency SoCG and associated FRA updates. For transparency, the revised ES Volume 3, Appendix 11-6: Flood Risk Assessment and Drainage Strategy Lime Down D [REP1-047] and ES Volume 3, Appendix 11-8: Flood Risk Assessment and Drainage Strategy Lime Down E2 [REP1-052] include additional explanation of floodplain interaction, displacement and the basis on which formal compensatory storage is not required. The revised FRA appendices	Agreed in Principle

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			for both Lime Down D and Lime Down E2 include updated floodplain storage displacement calculations and Figure 8 showing the relevant displacement calculation areas. The assessment demonstrates that displacement associated with panel supports is de minimis and would not materially affect floodplain storage, flood levels, flood extents, flow routes or flood risk elsewhere. On that basis, formal compensatory storage is not required or proportionate.	
3.7.15	Draft DCO - SPZ Monitoring	<u>Wiltshire Council broadly accepts the groundwater protection and pollution-control measures proposed for Source Protection Zones. The remaining issue is not the principle of groundwater protection, but demonstrating the circumstances in which groundwater monitoring will be required, how potential impacts will be identified and assessed, and what response measures will be implemented should adverse effects be detected. The LLFA therefore seeks greater clarity regarding the monitoring, reporting,</u>	Groundwater protection measures within Source Protection Zones are secured through the Outline CEMP [REP3-092] and related management plans. Any monitoring requirements will be agreed at detailed design stage through the discharge of DCO Requirements. <u>The Applicant is continuing to engage with Wiltshire Council regarding the matters raised. An updated position will be provided at Deadline 6.</u>	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		<u>review and corrective-action arrangements that will apply within Source Protection Zones, together with the criteria used to determine when monitoring is necessary and when intervention would be required.</u> <u>Remaining Ask:</u> <u>Clarify the criteria, triggers and decision-making process for groundwater monitoring within Source Protection Zones, including monitoring requirements, monitoring parameters, reporting arrangements, intervention thresholds, review procedures and corrective-action measures where impacts are identified.</u> Wiltshire Council notes that parts of the Scheme are located within Source Protection Zones (SPZs) and that construction activities, including excavation, trenchless installation techniques and temporary ground disturbance, may interact with groundwater conditions. The LLFA acknowledges that groundwater protection measures are proposed through the Outline CEMP		

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		and associated management plans. However, further clarity is required regarding how groundwater risks within SPZs will be assessed and the circumstances in which groundwater monitoring would be required. In particular, the LLFA considers that further information would be beneficial regarding the criteria for identifying locations where groundwater monitoring may be necessary, the parameters to be monitored, and the actions that would be implemented should adverse groundwater effects be identified. Accordingly, the LLFA considers that further clarification is required to demonstrate how groundwater risks within SPZs will be assessed, monitored where necessary, and managed throughout the construction phase.		
3.7.16	Draft DCO - CRC Runoff Control	<u>Wiltshire Council accepts that the principal construction-phase runoff and drainage risks associated with the Cable Route Corridor have been</u>	The Cable Route Corridor comprises predominantly subsurface infrastructure. Temporary compounds and access tracks will incorporate	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		<u>identified and are capable of being controlled through the proposed management framework. The remaining issue is not whether appropriate runoff, drainage, sediment-control and water-quality protection measures have been identified, but demonstrating how these measures will be implemented, monitored, maintained and, where necessary, adapted throughout the construction period. The LLFA therefore seeks greater confidence that suitable inspection, management and corrective-action arrangements will be in place to ensure the continued effectiveness of these controls during construction of the Cable Route Corridor.</u> <u>Remaining Ask:</u> <u>Demonstrate how temporary drainage measures, runoff controls, sediment-control measures and water-quality protection measures will be implemented, monitored, maintained and reviewed throughout construction of the Cable Route Corridor, including arrangements for inspection, reporting,</u>	appropriate construction drainage controls secured through the Outline CEMP [REP3-092]. No permanent surface water drainage infrastructure is required along the buried cable route. <u>The Applicant is continuing to engage with Wiltshire Council regarding the matters raised. An updated position will be provided at Deadline 6.</u>	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		<u>responsibilities, corrective action and adaptive management where issues are identified.</u> Wiltshire Council acknowledges that the Cable Route Corridor primarily comprises subsurface infrastructure and that permanent surface water drainage infrastructure is not generally required along the buried cable route. However, further clarity is required regarding the management of surface water runoff associated with temporary construction compounds, access tracks, haul routes and other temporary construction areas. In particular, the LLFA considers that additional information would be beneficial regarding the runoff control measures, drainage arrangements, inspection procedures and maintenance measures that will be implemented to prevent increased surface water runoff, erosion, sediment mobilisation and off-site impacts during construction. Accordingly, the LLFA considers that further clarification is required to		

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		demonstrate how temporary construction drainage and runoff control measures will be applied and maintained throughout the construction phase to ensure that flood risk and drainage function are not adversely affected.		
3.7.17	Draft DCO - OLEMP Buffers & SuDS	<u>Wiltshire Council supports the principle of integrating landscape management, watercourse buffers and runoff-management measures within the operational phase of the Scheme. The remaining issue is not the inclusion of these measures in principle, but demonstrating how they contribute to riparian enhancement, natural flood management objectives, runoff attenuation and wider multifunctional benefits beyond runoff control alone. The LLFA therefore seeks greater clarity regarding how these opportunities have been considered, incorporated and maintained within the operational management framework, and how their contribution to flood risk management and wider environmental objectives will be sustained over time.</u>	Riparian buffers and landscape mitigation are secured through the Outline CEMP [REP3-092] and the Design Principles and Parameters. Integration with drainage features will be addressed at detailed design stage where appropriate and proportionate. <u>The Applicant is continuing to engage with Wiltshire Council regarding the matters raised. An updated position will be provided at Deadline 6.</u>	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		<u>Remaining Ask: Demonstrate how opportunities for riparian enhancement, natural flood management, runoff attenuation and wider multifunctional benefits have been considered and incorporated within the operational management framework where feasible, including how such measures will be managed, maintained and reviewed throughout the lifetime of the Scheme.</u> Wiltshire Council welcomes the inclusion of riparian buffer planting within the Outline Landscape and Ecological Management Plan. The LLFA considers that, where appropriate and proportionate, opportunities should be taken during detailed design to integrate riparian buffers, drainage features and surface water management measures in order to support multiple benefits, including runoff management, water quality improvement, erosion control and wider environmental enhancement. Accordingly, the LLFA requests further clarification regarding how		

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		opportunities for integration between riparian buffers and surface water management measures will be considered through detailed design.		
3.7.18	Draft DCO - LLFA Engagement	The Applicant is encouraged to undertake early engagement with Wiltshire LLFA for discharge of flood risk-related Requirements.	The Applicant confirms its commitment to continued and early engagement with Wiltshire LLFA to facilitate the efficient discharge of flood risk and drainage-related Requirements.	Agreed
<u>3.7.19</u>	<u>Strategic Flood Management and Betterment</u>	<u>Wiltshire Council acknowledges that the primary objective of the Scheme is to avoid increasing flood risk and that the Applicant has identified a range of measures intended to manage runoff and protect the water environment. The LLFA also recognises that opportunities for wider flood risk benefits may be constrained by the nature, purpose and location of the Scheme. The remaining issue is not whether flood risk is appropriately managed, but demonstrating how opportunities for natural flood management, strategic runoff reduction, catchment resilience and downstream flood risk betterment have been considered as part of the Scheme design and management</u>	<u>Chapter 11 Hydrology, Flood Risk and Drainage [REP4-102] discusses the mitigation measures embedded in the design of the Scheme in Section 11.9 Embedded Mitigation and as relevant identifies reliance on any supporting documents. The Applicant is continuing to engage with Wiltshire Council regarding the matters raised. An updated position will be provided at Deadline 6.</u>	<u>Under Discussion</u>

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		<u>approach, and the extent to which feasible opportunities have been incorporated where reasonably practicable.</u> <u>Remaining Ask: Demonstrate how opportunities for natural flood management, strategic runoff reduction, catchment resilience and downstream flood risk betterment have been considered and evaluated. Where appropriate, provide a proportionate assessment of the potential benefits of feasible measures and explain how such measures have been incorporated into the Scheme, or why they have not been taken forward.</u>		
<u>3.7.20</u>	<u>Interrelationship Between Documents</u>	<u>Interrelationship Between Documents</u> <u>This remains one of the strongest residual themes. Atkins' review identified that hydrology-related controls are distributed across several documents rather than being presented within a single cohesive framework.</u> <u>The FRA, Drainage Strategy, LEMP, SRMP, CEMP, OEMP and supporting documents all contain controls relevant</u>	<u>The Applicant agrees that a consolidated audit trail would assist the LLFA, the Examining Authority and those responsible for implementing the secured controls.</u> <u>The Applicant has prepared a Mitigation Route Map [EXAM/XX], submitted at Deadline 5. It identifies:</u>	<u>Under Discussion</u>

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		<u>to hydrological performance. Individually, many of these controls appear appropriate. However, it is not always clear how they collectively function to maintain runoff management, soil condition, vegetation condition, erosion resistance, watercourse protection and the wider flood risk outcomes upon which the assessment relies.</u> <u>The LLFA therefore seeks 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.</u> <u>This matter is appropriate for resolution through the SoCG process because it relates to document integration, governance and management framework clarity.</u> <u>The LLFA also notes that the flood risk and drainage management framework</u>	<u>the mitigation and control relied upon;</u> <u>the purpose of each measure;</u> <u>the relevant phase of the Scheme;</u> <u>applicable monitoring and achievement criteria; and</u> <u>the DCO Requirement or other mechanism through which the measure is secured.</u> <u>The Hydrology, Flood Risk and Drainage section identifies the relationship between ES Chapter 11: Hydrology, Flood Risk and Drainage [REP4-012], the Flood Risk Assessment and Outline Drainage Strategy Appendices 11-1 to 11-9 [REP4-021 to REP4-036 and REP3-063] and the relevant secured management plans.</u> <u>The Mitigation Route Map is intentionally an audit trail rather than a duplicate management plan. The detailed commitments remain within the relevant secured documents,</u>	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		<u>relies not only on the FRA, Drainage Strategy and associated management plans, but also on DCO mechanisms including Requirement 11 (Surface and Foul Water Drainage), Requirement 13 (Construction Environmental Management Plan), Requirement 14 (Operational Environmental Management Plan), Requirement 17 (Soil Resources Management Plan), Article 17 (Discharge of Water), Article 50 (Maintenance of Drainage Works) and Part 9 of Schedule 15 (Protective Provisions for Drainage Authorities). The LLFA therefore seeks a clearer explanation of how these documents, management plans and DCO mechanisms interact as a cohesive framework to secure, implement, monitor, maintain and review the flood risk and drainage measures relied upon throughout the lifetime of the Scheme.</u>	<u>avoiding mirror drafting and the risk of inconsistencies between plans.</u> <u>The Applicant therefore considers that the Mitigation Route Map provides the consolidated framework requested. A separate hydrology management plan or duplication of the same controls across each management plan is not necessary.</u>	
<u>3.7.21</u>	<u>Long-Term Vegetation</u>	<u>The Applicant has placed substantial reliance on vegetation as a runoff and erosion control measure. The Ecology</u>	<u>The Applicant agrees that operational monitoring should identify material deterioration in vegetation condition</u>	<u>Under Discussion</u>

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
	<u>Monitoring and Management</u>	<u>and Biodiversity chapter, LVIA, Landscape and Ecological Management Plan and Cotswolds National Landscape Assessment contain commitments relating to vegetation establishment, maintenance and long-term management.</u> <u>However, the LLFA considers that further clarification is required regarding how vegetation condition will be monitored and managed in relation to hydrological performance. Particular attention should be given to sparse ground cover, beneath-panel vegetation condition, bare ground, drip-line erosion, flow concentration, channelisation, rilling and the implementation of remedial measures where vegetation performance deteriorates.</u> <u>These matters are important because deterioration in vegetation condition could reduce infiltration, increase runoff velocities, alter surface water flow pathways and increase sediment mobilisation. The LLFA therefore considers that vegetation management</u>	<u>before it results in erosion or alteration of runoff pathways.</u> <u>The existing management framework already provides for habitat monitoring, operational environmental monitoring, reporting and corrective action. However, the Applicant accepts that the specific indicators identified by the LLFA are not currently stated expressly.</u> <u>Targeted amendments will therefore be made to the Outline Landscape and Ecological Management Plan [REP3-100] and Outline Operational Environmental Management Plan [REP4-051] at Deadline 5 to provide for visual inspection of:</u> <u>• vegetation beneath and around the Solar PV Panels;</u> <u>• sparse or bare ground;</u> <u>• erosion associated with panel drip lines;</u> <u>• riling or channelisation; and</u>	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		<u>and monitoring should not be viewed solely as ecological requirements, but also as measures that contribute to the maintenance of flood risk, drainage and runoff-management outcomes throughout the lifetime of the Scheme.</u> <u>Remaining Ask: Demonstrate how vegetation relied upon to support runoff management, erosion control and flood risk outcomes will be monitored, maintained and reviewed throughout the lifetime of the Scheme, including arrangements for identifying deterioration, implementing remedial measures and assessing the effectiveness of corrective actions where necessary.</u>	<u>other evidence that vegetation condition may be materially affecting surface water runoff.</u> <u>Where material or persistent deterioration is identified, proportionate remedial measures may include reseeding, adjustment of grazing or vegetation management, local erosion repair, investigation of potential soil compaction and measures to restore diffuse surface water flow.</u> <u>The Applicant does not consider that a universal numerical vegetation-density threshold would be reliable or proportionate across the Scheme. Vegetation condition will vary according to season, soil type, weather, grazing regime and habitat objective. Intervention will therefore be triggered by observable deterioration beyond expected seasonal variation, assessed by a suitably competent person.</u> <u>These amendments clarify the application of the existing monitoring and corrective action framework. They</u>	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			<u>do not establish a separate hydrological monitoring regime.</u>	
<u>3.7.22</u>	<u>Recognition of the Hydrological Function of Vegetation and Soils</u>	<u>Wiltshire Council considers that the Applicant's documents appropriately recognise ecological, landscape and agricultural objectives. However, the hydrological function of vegetation and soils is often implicit rather than explicit within the management framework.</u> <u>Vegetation contributes to infiltration, surface roughness, rainfall interception, erosion resistance and the attenuation of shallow overland flow. Similarly, soil structure influences permeability, infiltration capacity, water storage, runoff generation and erosion susceptibility. These functions are relevant to the assessment of flood risk, drainage performance and water quality, as well as to the ecological and agricultural objectives of the Scheme.</u> <u>The LLFA notes that the Applicant's assessment and management approach relies upon the condition and performance of vegetation and soils as important controls on runoff behaviour.</u>	<u>The Applicant agrees that the collective role of the management plans in controlling surface water runoff and flood risk should be acknowledged more clearly.</u> <u>Concise wording will therefore be included within the relevant management plans confirming that the Outline CEMP [REP4-049], Outline OEMP [REP4-051], Outline SRMP [REP4-053] and Outline LEMP [REP3-100] collectively form part of the secured management framework necessary to control surface water runoff and flood risk during the relevant phases of the Scheme.</u> <u>This is a clarification of the relationship between the documents. It does not require the hydrological assessment within ES Chapter 11 [REP4-012] or the Flood Risk Assessment and Outline Drainage Strategy [REP4-021 to REP4-036 and REP3-063] to be</u>	<u>Under Discussion</u>

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		<u>However, the role of vegetation and soils as hydrological assets is not always clearly distinguished within the relevant management plans. The LLFA considers that greater recognition of their hydrological function would provide a clearer link between the management framework and the assumptions underpinning the flood risk and drainage assessment.</u> <u>Remaining Ask: Demonstrate how the hydrological functions of vegetation and soils have been recognised within the management framework, including how measures relating to vegetation condition, soil structure, compaction, erosion and surface water runoff will collectively contribute to the maintenance of the Scheme's flood risk and drainage objectives throughout the lifetime of the Scheme.</u>	<u>repeated within each management plan.</u>	
<u>3.7.23</u>	<u>Soil Compaction Monitoring and Remediation</u>	<u>Wiltshire Council acknowledges that the Soils and Agriculture chapter demonstrates a significantly improved appreciation of soil compaction risks</u>	<u>The Applicant notes that the matters raised by the LLFA are substantially addressed within the Outline Soil Resources Management Plan [REP4-</u>	<u>Under Discussion</u>

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		<u>compared with earlier stages of the Examination. The LLFA broadly accepts that soil compaction has been identified as a potential risk requiring management and remediation where necessary.</u> <u>The remaining issue is not the identification of compaction risk itself, but demonstrating how soil condition and compaction will be monitored, assessed, managed and verified throughout the lifetime of the Scheme. The LLFA considers that further clarification is required regarding inspection methodologies, monitoring arrangements, intervention criteria, remediation standards, verification procedures and the management of activities that may contribute to compaction during operation and maintenance.</u> <u>This issue is hydrologically important because soil compaction can reduce infiltration capacity, increase surface water runoff, alter runoff pathways and contribute to erosion. The LLFA therefore considers that soil</u>	<u>053]</u> and the Outline Operational Environmental Management Plan [REP4-051]. <u>The Outline SRMP [REP4-053]:</u> <u>• applies during construction and throughout the lifetime of the Scheme;</u> <u>• applies to soils disturbed through excavation or trafficking;</u> <u>• requires monitoring during construction and operation;</u> <u>• requires continuous monitoring of soil handling, weather and ground conditions;</u> <u>• requires visual monitoring of ground condition;</u> <u>• requires inspection for compaction following pile installation and before panels are fixed;</u> <u>• requires remediation while affected ground remains accessible;</u>	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		<u>compaction monitoring and remediation should be recognised as part of the flood risk and drainage management framework, rather than solely as an agricultural restoration measure.</u> <u>Remaining Ask: Demonstrate how soil compaction risks will be monitored, assessed, managed and remediated throughout the lifetime of the Scheme, including arrangements for inspection, identification of potential compaction issues, intervention criteria, remediation measures, verification of remediation effectiveness, ongoing review and the management of operational activities that may contribute to soil deterioration.</u>	<u>identifies the contractor and suitably qualified soil practitioner as responsible parties; and</u> <u>provides for assessment, remediation and sign-off of reinstated land.</u> <u>These requirements are set out principally at paragraphs 1.3.1 to 1.3.3 and 1.8.34 to 1.8.39 of the Outline SRMP [REP4-053].</u> <u>The Outline OEMP [REP4-051] also identifies the potential for operational maintenance activities to cause surface compaction. It requires soil assessments and monitoring in accordance with the SRMP and identifies inspection by a suitably experienced soil scientist as an available means of identifying emerging compaction issues.</u> <u>The detailed SRMP will specify the site-specific inspection procedures, remediation techniques and verification arrangements in accordance with these secured principles.</u>	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			<u>The Applicant does not consider that routine intrusive testing across all operational panel areas would be proportionate. The risk of operational compaction is associated principally with trafficking, maintenance, repair or replacement activities rather than the presence of the Solar PV Panels. Operational monitoring will therefore focus on areas affected by those activities or where visible indicators such as rutting, persistent ponding, erosion or vegetation decline indicate potential deterioration.</u> <u>Further wording has been added to the SRMP [REP4-053] to be submitted at Deadline 5 to clarify the process to be followed should these instances be recorded such as investigation by a suitably qualified soil practitioner, remedial action and subsequent monitoring. Moreover, as described under Item 3 clarification will be added to the SRMP setting out its relationship with surface water runoff and pointing to Appendices 11-1 to 11-9: Flood Risk Assessment and Outline</u>	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			<u>Drainage Strategies [REP4-021 to REP4-036 and REP3-063].</u>	
<u>3.7.24</u>	<u>Construction Phase Drainage and Monitoring</u>	<u>Wiltshire Council acknowledges that the revised CTMP contains a significantly strengthened governance framework compared with earlier versions, including arrangements for monitoring, reporting, responsibilities, complaints handling, compliance and corrective action. The LLFA welcomes this improvement.</u> <u>The remaining issue is not the governance framework itself, but demonstrating how construction-phase water management measures will be implemented, monitored, maintained and reviewed throughout the construction period. Further clarification is sought regarding temporary drainage arrangements, runoff control during soil stripping and access construction, sediment-control measures, temporary storage, watercourse protection, maintenance of temporary drainage features, flood response procedures, wet-weather inspections, management of haul roads and temporary</u>	<u>The Applicant notes that the matters identified by the LLFA are substantially addressed within the Outline Construction Environmental Management Plan [REP4-049] submitted at Deadline 4.</u> <u>Table 5 of the Outline CEMP [REP4-049] already requires:</u> <u>• monitoring of temporary drainage throughout construction;</u> <u>• temporary drainage arrangements to be confirmed within the detailed CEMP;</u> <u>• a robust maintenance plan for temporary drainage;</u> <u>• temporary lagoons, tanks, bunds, silt fencing, settlement features and other treatment measures where required;</u> <u>• appropriately sized runoff storage areas;</u>	<u>Under Discussion</u>

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		<u>hardstanding, and the reinstatement of temporary drainage pathways.</u> <u>Construction activities have the greatest potential to disturb soils, alter runoff pathways and mobilise sediment. The LLFA therefore considers that construction-phase drainage, runoff-management and water-quality protection measures should be clearly linked to monitoring, inspection, reporting and corrective-action procedures to ensure their continued effectiveness throughout construction.</u> <u>Remaining Ask: Demonstrate how construction-phase drainage, runoff-control, sediment-control and water-quality protection measures will be implemented, monitored, maintained and reviewed throughout construction, including arrangements for inspection, responsibilities, reporting, performance review, corrective action, flood response and adaptive management where issues are identified.</u>	<u>treatment of construction runoff before discharge;</u> <u>protection and recording of existing agricultural drainage systems;</u> <u>inspection and maintenance of SuDS and sediment controls;</u> <u>a Water Management Plan forming part of the detailed CEMP; and</u> <u>management of temporary drainage, sequencing and contingency measures where construction activities overlap or interface between the Solar PV Sites and Cable Route Corridor.</u> <u>The Water Management Plan will also establish monitoring locations, parameters, frequencies, methods and trigger levels proportionate to the sensitivity of the receiving environment.</u> <u>The Outline CEMP [REP4-049] also identifies the Environmental Manager, Environmental Clerk of Works and Flood Warden as responsible parties. Sections 5 and 6 require monitoring.</u>	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			<u>inspections, audits, records, corrective action and management review.</u> <u>Flood response is not dependent solely upon formal Environment Agency flood warnings. Weather forecasts, flood warnings, observed site conditions and local waterway levels will inform the management of construction activities. This provides an appropriate mechanism for smaller watercourses that are not covered by a formal warning service.</u> <u>The exact locations and configurations of temporary drainage measures cannot reasonably be fixed before the construction sequence, contractor methodology, detailed ground conditions and active working areas are known. Those details are appropriately developed through the detailed CEMP and Water Management Plan within the framework already secured.</u> <u>The Applicant therefore does not consider that a substantive gap remains in the construction drainage controls. No further technical</u>	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			<u>amendment is proposed beyond the concise cross-plan acknowledgment.</u>	
<u>3.7.25</u>	<u>Monitoring, Governance and Performance Triggers</u>	<u>Wiltshire Council acknowledges that the Applicant has demonstrated, through the CTMP and associated management plans, the ability to establish a structured governance framework incorporating monitoring, reporting, responsibilities, compliance management, complaints handling, review mechanisms and escalation procedures. The LLFA welcomes this approach.</u> <u>The remaining issue is not the principle of governance and monitoring, but demonstrating how a comparable level of clarity and assurance will be applied to the monitoring and management of hydrological performance throughout the lifetime of the Scheme. Further clarification is sought regarding inspection frequencies, responsible parties, monitoring parameters, performance indicators, intervention criteria, corrective actions, reporting mechanisms, audit procedures,</u>	<u>The Applicant agrees with the general governance principles identified by the LLFA. However, the required framework is already established across the Deadline 4 documents.</u> <u>The Outline CEMP [REP4-049] requires:</u> <u>• named roles and responsibilities;</u> <u>• monitoring and inspections;</u> <u>• environmental audits;</u> <u>• logbooks and records;</u> <u>• an Environmental Action Schedule;</u> <u>• reporting of deviations;</u> <u>• corrective action; and</u> <u>• management review.</u>	<u>Under Discussion</u>

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		<u>escalation routes and review arrangements.</u> <u>These matters are important because the Applicant's flood risk and drainage strategy relies upon the ongoing condition and performance of vegetation, soils, drainage features and runoff-management measures. The LLFA considers that proportionate governance, monitoring and corrective-action arrangements are necessary to ensure that deterioration in hydrological performance is identified, investigated and addressed before adverse flood risk, drainage or water quality effects arise.</u> <u>Remaining Ask:</u> <u>Demonstrate how hydrological performance will be monitored, reviewed and managed throughout the lifetime of the Scheme, including arrangements for inspections, responsibilities, monitoring parameters, performance indicators, intervention criteria, reporting, audit, escalation, corrective action, performance review and adaptive management where necessary.</u>		

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
<u>3.7.26</u>	<u>Draft DCO - Ordinary Watercourse Consent and Environmental Permitting</u>	<u>Wiltshire Council Position</u> <u>Wiltshire Council previously sought amendments to Article 17 of the draft DCO to clarify that, where a watercourse, public sewer or drain belongs to, or is under the control of, a drainage authority, the approval process contained within Part 9 of Schedule 15 applies in place of the generic Article 17 approval mechanism. The purpose of the amendment was to avoid uncertainty and potential overlap between approval regimes where drainage authority assets are affected. The Examining Authority has requested an update on this matter and invited the parties to record their position within the Statement of Common Ground.</u> <u>Agreed Position</u> <u>The Applicant has accepted amendments to Article 17 to clarify the relationship between the discharge powers contained within Article 17 and the approval process contained within</u>	<u>The Applicant accepted the proposed amendment to Article 17 and incorporated the agreed wording within Revision 4 of the draft DCO.</u>	<u>Agreed</u>

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		<u>Part 9 of Schedule 15. The parties agree that the revised drafting provides appropriate clarification regarding the approval of works affecting watercourses, public sewers and drains under the control of a drainage authority, and avoids unnecessary duplication between approval mechanisms.</u> <u>The parties further agree that the Draft DCO does not remove, replace or disapply any separate statutory consent or permitting requirements that may be required outside the DCO process, including Ordinary Watercourse Consent and Environmental Permits where applicable.</u> <u>Status: Agreed</u> <u>This approach is stronger because:</u> <u>• it records the ExA issue;</u> <u>• explains why the amendment was required;</u> <u>• records the agreed outcome;</u>		

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		• <u>confirms Ordinary Watercourse Consents and permits still apply;</u> • <u>closes the issue cleanly as an agreed matter</u>		

3.8 Cultural Heritage (Built heritage and Archaeology)

Table 3-8: Cultural Heritage (Built heritage and Archaeology)

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
3.8.1	Legislation and Policy	Wiltshire Council consider that the relevant legislation and guidance has been referred to in the assessment.	The Applicant considers that the assessment provided in ES Volume 1, Chapter 12: Cultural Heritage [REP3-012] is in line with appropriate legislation, policy and guidance.	Agreed
3.8.2	Methodology	Wiltshire Council consider that the assessment methodology that has been followed is robust and proportionate and aligns with best practice. The methodology reflects consultation with the Council, including in respect of the requirement to exercise professional judgement.	The methodology adopted within ES Volume 1, Chapter 12: Cultural Heritage [REP3-012] is in line with appropriate guidance and has been derived following consultation with relevant stakeholders (i.e. Wiltshire Council and Historic England).	Agreed
3.8.3	Baseline	Wiltshire Council consider that built heritage assets have been correctly identified and their significance assessed in an appropriate manner which reflects baseline site conditions.	The baseline conditions which are detailed in ES Volume 1, Chapter 12: Cultural Heritage [REP3-012] are representative of the baseline site conditions.	Agreed
3.8.4	Assessment: built heritage	Wiltshire Council is satisfied that the heritage assessment is robust and credible, with no major gaps in scope or methodology. Where impacts have	The assessment results set out within ES Volume 1, Chapter 12: Cultural Heritage [REP3-012] , supported by supported by ES Volume 3, Appendix	Agreed

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		been identified, it is generally agreed that these correctly causing the council considers that do alter conclusion that there will be significant residual effects on built assets.	12-1: Heritage Statement [APP-219] , including likely significant effects and residual effects are acceptable.	
3.8.4a	Assessment: built heritage	Following consideration of the third-party Relevant Representations, Representation by Matthew Dominik Shipp [RR-3086] one additional issue has been raised: the Council considers that the potential impact on the significance of the Grade II* Grittleton House from the temporary construction compound and cable route (Works 5A) within its setting, merits further assessment. It is not expected that this would alter the overall conclusion <u>and both parties are agreed that there will be no that the level of harm would not equate to a significant heritage effect significant residual effects</u> but there may be a need for additional mitigation <u>to address the socio-economic impact which has the potential to have an indirect impact on the conservation of the asset.</u>	Grittleton House (NHLE 1022310) is assessed within ES Volume 3, Appendix 12-1: Heritage Statement [APP-219] , which considers its significance, setting and historic relationship with the wider Grittleton Estate. The assessment concludes that there would be no harm to its significance or setting arising from the operational Scheme. <u>Both parties agree that it would not result in any significant heritage effects.-</u> Any construction-related effects would be temporary and localised in nature and managed through the Outline CEMP [REP13-0962] . A site visit to the property grounds, interior rooms with views towards the Scheme, and land within the Scheme was undertaken with the Conservation Officer on 5 May <u>2026</u> .	Under discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		Amendments made to the Outline CEMP [REP3-092] to date are considered insufficient to secure mitigation from construction. It is noted that construction related effects will be “temporary and localised in nature”, however there is uncertainty regarding the duration and level of impact and the Council considers that even temporary and reversible impacts have the potential for significant impact on the economic viability and therefore long term conservation of the building, taking into account the nature of its use. More effective mitigation is therefore required.	The Applicant is continuing to discuss this matter with the Wiltshire Conservation Officer.	
3.8.5	Assessment: archaeology	Wiltshire Council considers that, although significant archaeological activity has been identified, no heritage assets present an overriding constraint to the development, provided an agreed programme of archaeological mitigation is implemented. Impacts would be addressed through scheme design changes, archaeological excavation, or non-intrusive construction methods, and WCAS	The archaeological assessment provided in ES Volume 1, Chapter 12: Cultural Heritage [REP3-012] is supported by the results of a programme of archaeological evaluation see the following ES appendices: ES Volume 3, Appendix 12-2: Archaeological Desk – Based Assessments [APP-220 to APP-221];	<u>Under Discussion</u> <u>Agreed</u>

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		agrees that no significant residual effects on cultural heritage are predicted during construction. Wiltshire Council requires full final reports from the trenching and geophysics prior to the determination of this application.	• ES Volume 3, Appendix 12-3: Aerial Photographic and LiDAR mapping and interpretation [APP-122]; • ES Volume 3, Appendix 12-4: Archaeological Geophysical Survey Reports [APP-223 to APP-224]; and • ES Volume 3, Appendix 12-5: Archaeological Evaluation (interim reports) [APP-225 to APP-229] Archaeological evaluation works were undertaken in line with a Written Scheme of Investigation (WSI) agreed with the Local Authority's Planning Archaeologists. ES Volume 3, Appendix 12-5: Archaeological Evaluation (interim reports) [APP-225 to APP-229] were submitted as part of the DCO Application and ES Volume 3, Appendix 12-4: Archaeological Geophysical Survey Reports [APP-223 to APP-224] was submitted as part of the DCO Application. An	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			updated report covering the geophysical survey of the cable route corridor will be submitted, once available. Full evaluation reports were submitted to Wiltshire Council on the 18th May 2026. ES Volume 3, Appendix 12-6 Outline Archaeological Mitigation Strategy [APP-230] will be updated, as required, with the results of these updated assessments. Archaeological evaluation has been undertaken in accordance with Paragraph 5.9.10 of NPS EN1, Paragraphs 2.10.113 and 2.10.115 of NPS EN3 and Paragraph 207 of NPPF to ensure the level of detail provided as part of the assessment is proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. The works undertaken as part of the archaeological evaluation is considered appropriate for the assessment. Following the implementation of mitigation proposed in ES Volume 1,	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			Chapter 12: Cultural Heritage [REP3-012] , there would be no significant effects to archaeological assets.	
3.8.6	Approach to mitigation: built heritage	Wiltshire Council notes that the embedded mitigation proposed is generally extensive. No additional built heritage mitigation is currently proposed, which is considered reasonable given the generally low level of residual harm. However, further refinement may be needed for Bradfield Manor to reduce visibility, and additional mitigation could help limit impacts on Rodbourne Conservation Area, particularly through reinstating its rural character after construction. The Council also identifies a key omission: there is no provision for monitoring or adaptive management to assess the effectiveness of mitigation or respond if it proves inadequate. Amendments to the Outline CEMP [REP3-092] and Outline CTMP [REP1-112] intended to mitigate the impact on the Rodbourne Conservation	Where impacts have been identified to built heritage assets these have been appropriately mitigated (see Section 12.9 of ES Volume 1, Chapter 12: Cultural Heritage [REP3-012] for embedded mitigation and Section 12.11 for additional mitigation). Mitigation measures for built heritage assets are appropriately managed through the Outline CEMP [REP3-092], Outline OEMP [REP3-094], Outline LEMP [REP3-100] and the Outline CTMP [REP1-112], which is secured through the DCO. <u>The wording ensures that approval is required from the Council and consultation with both the Conservation officer as well as the highways officer, and therefore impacts can be mitigated in relation to cultural heritage.</u>	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		Area via the involvement of the Conservation Officer in the design of the works does not provide any effective mitigation as the design is unknown and there is no certainty that there will be a solution which can prevent the occurrence of harm. Updates to the Outline CEMP [REP3-092] in line with the Outline LEMP [REP3-100] which are reported as being intended to ensure monitoring simply relate to the usual provisions for replacing dead and dying specimens to ensure the landscaping remains in situ. They do not include any proposals for monitoring or assessing the efficacy of the landscaping in providing the mitigation envisaged or for making amendments if required.		
3.8.7	Approach to mitigation: archaeology	Significant archaeological remains have been identified. Wiltshire Council cannot confirm the adequacy of archaeological protection as the mitigation strategy is incomplete: Full trial trenching and geophysical survey of the CRC is outstanding	ES Volume 3, Appendix 12-6: Outline Archaeological Mitigation Strategy [APP-230] details the mitigation measures to safeguard archaeological assets including preservation in situ (using a non-intrusive construction methodology) and mitigation by record	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		A Detailed Archaeological Mitigation Strategy (DAMS) has not yet been submitted, although this is required during the examination Strip, Map and Record excavations are required for key sites Site-Specific Written Schemes of Investigation (SSWSIs) should be produced for approval by the council A written programme of archaeological investigation for on-site and off-site work, including analysis, publishing and archiving of the results should be produced for approval by the council A public engagement plan is required during mitigation works. The archaeological mitigation for the cable route has not been included within any of the scheme documentation to date. This should be agreed and included within the DAMS, that Wiltshire Council require to be produced and agreed prior to the close of the examination.	(including strip, map and sample) and is considered acceptable. The ES Volume 3, Appendix 12-6: Outline Archaeological Mitigation Strategy [APP-230], provides an overarching methodology for undertaking a programme of archaeological mitigation within the Scheme. Written Schemes of Investigations (WSIs) that detail site-specific mitigation measures will be appended to the Outline AMS in advance of each phase of mitigation works. It is intended that these WSIs will include information regarding the programme of archaeological investigation for on-site and off-site work (including analysis, publishing and archiving of the results) as well as public engagement plans, and will be approved by Wiltshire Council prior to their implementation. The final mitigation strategies will be set out in the Final AMS secured through Requirement 12 of the Draft DCO.	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
3.8.8	Cumulative / in-combination effects,	With regard to the assessment for cumulative / in-combination effects, the assessment methodology and need for professional judgement were discussed post statutory consultation stage and the cumulative assessment is proportionate.	The cumulative impacts have been assessed with consideration to the Scheme and other proposed and identified developments (see Section 12.12 of ES Volume 1, Chapter 12: Cultural Heritage [REP3-012]). This approach is in line with the methodology detailed in Section 6.8 of ES Volume 1, Chapter 6: EIA Methodology [APP-058], consultation undertaken with Wiltshire Council, as well as guidance and policy (i.e. Paragraph 56 of Historic England Advice Note 15: Commercial Renewable Energy Development and the Historic Environment and Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment). No significant cumulative effects were identified to heritage assets. ES Volume 1, Chapter 12: Cultural Heritage [APP-064] considered impacts on cultural heritage and archaeology from other topics. As such no in-combination effects	Agreed

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			alongside cultural heritage were identified as a result of the Scheme.	

3.9 Transport and Access

Table 3-9: Transport and Access

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
3.9.1	Legislation and Policy	Wiltshire Council provided no comment on legislation and policy used for the assessment.	The Applicant considers that ES Volume 1, Chapter 13: Transport and Access [REP3-019] has identified and appropriately considered all applicable legislation and policy.	Agreed
3.9.2	Methodology	Wiltshire Council provided no comment on the methodology used for assessment.	The methodology adopted within ES Volume 1, Chapter 13: Transport and Access [REP3-019] has been derived from the information obtained through consultation with stakeholders and by reviewing relevant guidance and studies and is considered acceptable.	Agreed
3.9.3	Baseline	Wiltshire Council provided no comment on the baseline used for assessment in its relevant representation. However, subsequent review of the other relevant representations, and expressly the Stop Lime Down representation, has drawn attention to the existing use of the narrow roads being proposed for HGV construction access by cyclists, walkers and equestrians. The lack of any proper assessment on the impact	The baseline conditions which are detailed in ES Volume 1, Chapter 13: Transport and Access [REP3-019] are representative of the baseline site conditions. This includes an assessment of Non-Motorised Users (NMUs). A Technical Note regarding the assessment of non-motorised users will be submitted at Deadline 3. At	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		on these users is supported, as no volumetric surveys have been undertaken to determine the present level of usage by non-motorised users.	Deadline 4 plans (6.2 Environmental Statement Volume 2, Figure 13-5 Abnormal Load Routes - Solar PV Sites (Rev 2) and Figure 13-6 Abnormal Load Routes - Cable Route Corridor (Rev 2) [EN010168/APP/6.2]) will be submitted showing the proposed widening and passing places including geometries. Meeting with Stop Lime Down and Wiltshire Council highways will be sought to discuss further. Additional NMU surveys will also be submitted at Deadline 5.	
3.9.4	Assessment Results-Construction Routes	The ES identifies Highway Improvement Areas (HIAs) for facilitating construction, but these do not appear to cover minor roads providing primary access to Lime Down Sites A–.C and Lime Down Site D. Swept path analysis in Annex H to the ES Volume 3, Appendix 13-1: Transport Assessment [APP-233] show that long lengths of the proposed access route along Alderton Road/Fosse Way to Lime Down , Sites A-C are narrow, often allowing only one	Annex J of ES Volume 3, Appendix 13-1: Transport Assessment [REP3-065 and REP3-066] demonstrates adequate carriageway width or frequency of passing place opportunity to pass at least an HGV and a light vehicle as requested in comments provided by Wiltshire Council in its response (August 2025) to the Transport Assessment Scoping Note and confirmed in Paragraph 4 of 'Appendix A - Highways and Transport Document Review - Detailed	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		HGV and a car to pass, and in some sections even less, requiring drivers to wait in a suitable location to allow passage of the other through the 'narrowed' sections. Some of these restricted passage sections appear quite long, as indicated by the inter-visibility distances shown between passing points. Similarly, examination of the Lime Down Site D access route between Dyson Roundabout and Bradfield Cottages indicates that the existing carriageway width is, for the most part, only able to pass an HGV and a car. Furthermore, parts of the route do not even accommodate this, so the available width limited to only two car passage. None of these minor roads proposed for construction access have been assessed for passing opportunity for two opposing HGVs, which given the level of predicted HGV trafficking associated with Lime Down Site D is a very real concern. Table 13-12 in the Transport Assessment (Table 13-20 in	Comments' of the Wiltshire Council Relevant Representation [RR-4934]. This confirms that no passing bay or widening improvements are needed to accommodate these movements on the construction route outside of the Order Limits. For the construction route between Dyson Roundabout and Bradfield Cottages, the distances between passing points outside of the Order Limits are all less than 50 metres, with forward visibility extending to the next passing point and beyond. Annex J of ES Volume 3, Appendix 13-1: Transport Assessment [REP3-065 and REP3-066] demonstrates adequate carriageway width or frequency of passing place opportunity to pass at least an HGV and a light vehicle as requested in comments provided by Wiltshire Council in its response (August 2025) to the Transport Assessment Scoping Note and confirmed in Paragraph 4 of 'Appendix A - Highways and Transport Document Review - Detailed Comments' of the Wiltshire Council	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		the ES) shows a predicted 76 HGV movements per day on the narrow route to Lime Down Site D. In summary, the current proposals are considered insufficient to manage HGV traffic safely, and the potential need for two-way HGV passage on constrained minor roads must be addressed to avoid operational and safety issues during construction. While the commitment to Road Condition Surveys in the Outline Construction Traffic Management Plan (OCTMP) [APP-287] is welcomed, this is not considered a substitute to providing suitable passing bay mitigation at outset to accommodate opposing HGV passage. The aim should be to limit the risk of highway damage in the first instance, not deal with it after or during construction. The council considers that the said surveys must include Alderton Road, Fosse Way, the unnamed road between Fosse Way and Sherston, and the route from Dyson Roundabout to Bradfield Cottages as a minimum, based on swept path analyses in	Relevant Representation [RR-4934] This confirms that no passing bay or widening improvements are needed to accommodate these movements on the construction route outside of the Order Limits. For the construction route to Lime Down A-C, the distances between passing points outside of the Order Limits are all less than 100 metres, with forward visibility extending to the next passing point and beyond. As set out in the Outline CTMP [REP3-108], a booking system will be set up to manage arrivals and departures to the Order Limits. This will be implemented in coordination with banksmen, which will be able to hold back any cross-over, should there be any delays on the roads. This will prevent HGVs generated by the Scheme passing each other in opposite directions on the local roads forming part of the construction routes and will be confirmed as part of the final CTMP. With regard to Lime Down A, excessive widening of the existing rural route to allow two HGVs to pass would be over	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		Annex H. However, if defects picked up show that the baseline condition is poor in certain locations, then it is not inconceivable that an unacceptable level of damage might well occur with HGV trafficking during the construction phase. It is thus unclear what the applicant would be required to do under the DCO in this circumstance during the construction phase, so short-term remedials necessary to make the highway safe. It should not fall on Council budgets to do this. Wiltshire Council's view and position is that a formal requirement for a section 59 Agreement (Highways Act 1980) should be included as a DCO Condition to cover highway damage liability, so not something the applicant 'might' be prepared to entertain or agree to. Furthermore, a set of pre-construction and post-construction surveys won't cover what may need to be done to address unacceptable damage and potential safety issues should this happen during the construction period.	engineering, because of the following reasons: Temporary nature of the construction period; Trip generation of 16 HGVs on the route to Lime Down A is an estimate of the deliveries on a peak day, so does not represent a daily average; Trip generation of 16 HGVs on the route to Lime Down A is based on the worst-case assumptions, including but not limited to, all phases and Solar PV Sites being constructed simultaneously and a 50% uplift; Assuming the proposed construction programme shown in Table 13-9 of S Volume 3, Appendix 13-1: Transport Assessment REP3-065 and REP3-066], where all sites are not constructed concurrently, the maximum average daily number of HGV movements along the route to Lime Down A is only 10 per day/less than 2 per hour/one every 42 minutes (less than the journey time along the route), with the construction phase for Lime Down Site A only lasting 9 months; • Delivery times during the construction phase are limited to those times set out in the Outline	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		As such provisions would need to include the below: - The required network extent of comprehensive 'independent' highway pre-condition surveys. Road lengths considered as a necessary 'minimum' by Wiltshire Council have been set out above. - Agreement to do some pre-emptive works if necessary if the said pre-condition surveys reveal defects which could lead to early failure with the level of HGV construction traffic envisaged. - Linked to the above, a mechanism to do necessary repairs at no cost to the Council during the construction phase. This would require details of remedial works proposed to be firstly approved by the Council, and the completed works subject to an inspection regime. Agreement to return the roads covered and used for HGV construction trafficking to 'at least' as good a	CTMP [REP3-108]. There will be no HGV trips outside of these hours; - Impact on hedgerow, trees and character; and - Low level of existing HGVs on the route to Lime Down A (average number of existing HGV movements is only 40 per day, with some of these movements occurring outside of proposed construction hours set out in the Outline CTMP [REP3-108]) With regard to the construction route to Lime Down A-C, excessive widening of existing rural routes to allow two HGVs to pass would be over engineering, because of the following reasons: - Temporary nature of the construction period; - Trip generation of 50 HGVs on the route to Lime Down A-C is an estimate of the deliveries on a peak day, so does not represent a daily average; - Trip generation of 50 HGVs on the route to Lime Down A-C is based	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		condition as they were at outset after the construction phase.	on the worst-case assumptions, including but not limited to, all phases and Solar PV Sites being constructed simultaneously and a 50% uplift; - Assuming the proposed construction programme shown in Table 13-9 of S Volume 3, Appendix 13-1: Transport Assessment [REP3-065 and REP3-066] , the maximum average daily number of HGV movements along the route to Lime Down A is 32 per day/less than 7 per hour/one every 8 minutes (less than the journey time along the route); - Delivery times during the construction phase are limited to those times set out in the Outline CTMP [REP3-108]. There will be no HGV trips outside of these hours; - Impact on hedgerow, trees and character; and - Low level of existing HGVs on the route to lime down a-c (average number of existing HGV movements is only 20 per day, with	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			some of these movements occurring outside of proposed construction hours set out in the Outline CTMP [REP3-108] The construction route to Lime Down D is split between the route to Bradfield Cottages, which serves Lime Down D (West) and the A429, which serves Lime Down D (East). With regard to the Lime Down D (west) construction route, excessive widening of the existing rural route to allow two HGVs to pass would be over engineering, because of the following reasons: • Temporary nature of the construction period; • Trip generation of 56 HGVs on the route to Lime Down D (west) is an estimate of the deliveries on a peak day, so does not represent a daily average; • Trip generation of 56 HGV on the route to Lime Down D (west) is based on the worst-case assumptions, including but not limited to, all phases and Solar PV	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			Sites being constructed simultaneously and a 50% uplift; - Assuming the proposed construction programme shown in Table 13-9 of S Volume 3, Appendix 13-1: Transport Assessment [REP3-065 and REP3-066] , where all sites are not constructed concurrently, the maximum average daily number of HGV movements along the route to Lime Down D (west) is only 30 per day/less than 5 per hour/one every 14 minutes (less than the journey time along the route); - Delivery times during the construction phase are limited to those times set out in the Outline CTMP [REP3-108]. There will be no HGV construction trips outside of these hours; - There would be a much greater impact on hedgerow, trees and character; and - Low level of existing HGVs on the route to Lime Down D (west) – The average number of existing HGV	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			movements is only 46 per day, with some of these movements occurring outside of proposed construction hours set out in the Outline CTMP [REP3-108] Annex K in S Volume 3, Appendix 13-1: Transport Assessment [REP3-065 and REP3-066] demonstrates where there is adequate carriageway width and/or passing place opportunity for two HGVs along the construction routes. As set out in the Outline CTMP [REP3-108], pre-construction, interim and post-construction Road Condition Surveys will be undertaken to repair any damage caused to the highway and verges during the construction period. The details of these surveys will be confirmed as part of the Final CTMP. Where defects are identified and are reasonably attributable to construction activities associated with the Scheme, these will be corrected to the satisfaction of the relevant highway authority, either during the construction	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			phase where required for safety reasons, or following completion of the works (paragraph 6.12.1). At Deadline 1, the Applicant also included amendments to the Outline CTMP [REP3-108] to make the process for remediation of road damage during the construction phase clearer. Where immediate repairs are required during the construction phase for safety reasons, the oCTMP now expressly requires these to be undertaken at the time. At Deadline 4 plans (6.2 Environmental Statement Volume 2, Figure 13-5 Abnormal Load Routes - Solar PV Sites (Rev 2) and Figure 13-6 Abnormal Load Routes - Cable Route Corridor (Rev 2) [EN010168/APP/6.2]) will be submitted showing the proposed widening and passing places including geometries. Meeting with Stop Lime Down and Wiltshire Council highways will be sought to discuss this matter further. Additional NMU surveys will also be submitted at Deadline 5.	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
3.9.5	Transport Assessment - HGV Volumes – Solar Farm Sites (Construction Phase) / Information to support trip generation calculations	Annex E to ES Vol 3, 6.3 Appendix 13-1 Transport Assessment [APP-233] includes a breakdown of HGV trip generation calculations for the solar farm sites during the construction phase, but the Council notes several gaps: Material volumes and component numbers per Lime Down site are not clearly specified or verified by evidence from existing solar farm sites. For example, whilst the total number assumed PV Modules for each of the Lime Down sites (A-E) is stated, it is unclear how these quantities have been derived. The area occupied by panels on each site will be known (Works 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 structures. Assumptions made regarding the type of mounting structures or foundations/ supports	The trip generation for the construction phase has been calculated based on a detailed and realistic breakdown of the likely quantities and material volumes required to build out the various sites and cable routes. A further breakdown of Solar PV Sites Trip Generation Calculations is provided at Annex E of S Volume 3, Appendix 13-1: Transport Assessment [REP3-065 and REP3-066] submitted at Deadline 1. This presents specific assessed quantities of material volumes and component type/numbers for each Solar PV Site. Notes are included for clarity, with a breakdown of Trip Generation based on construction phasing also provided. The calculations show the proposed trip generations for each Solar PV site. The calculated daily and hourly flows for the proposed construction routes are based upon the proposed construction programme and are presented in Annex F of ES S Volume 3, Appendix 13-1: Transport	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		are absent. Figures also suggest that HGV deliveries for mounting structures will constitute only 43% of the deliveries needed for the solar panels. The basis for predicted HGV numbers and types is unclear, including the meaning of the “1.2 ratio” used for modules and mounting structures. Aggregate volumes are not broken down by site, making assessment uncertain. Waste calculations only cover packaging, ignoring excavated material from access tracks, foundations, and substations, leaving uncertainty about off-site spoil disposal. These assumptions and calculations need clarification to confidently assess predicted HGV volumes, impacts and construction logistics. There is a concern that the true number of HGV trips needed during the construction phase may be under-estimated, so amplifying highway safety/damage concerns about two-way HGV passage	Assessment [REP3-065 and REP3-066] . As shown in the calculations contained in Annex E of S Volume 3, Appendix 13-1: Transport Assessment [REP3-065 and REP3-066] 83% of all HGV deliveries will be undertaken by 10m rigid vehicles, with the remaining 17% of HGV deliveries made by 16.5m articulated vehicles. In relation to modules and mounting structures a 1.2 'Ratio' factor is included, and this figure represents a reduced loading factor per HGV, based on the difference in size between a High Cube and a standard container. The assessments assume standard sized containers, presenting a reasonable-worst case assessment. In practice a majority of modules and mounting structures will be delivered by HQ containers, reducing the assumed number of HGVs, with the exception of Lime Down Site E and the eastern section of Site D, which are accessible via the low bridge on the A429.	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		along the narrow roads being used for planned construction routes.	Aggregate volumes for access tracks for example have been assessed on a site-by site basis in accordance with each sites relative size. This is included within the calculations at Annex E to S Volume 3, Appendix 13-1: Transport Assessment [REP3-065 and REP3-066] . As a reasonable worst-case it has been assumed that all internal access tracks will be constructed using aggregate, when in practice a number of internal access tracks will remain as grass tracks. In terms of excavated material, there will be no site wide reprofiling required. It has been assumed that any excavated material will be reused on site. In the event of any spoil being taken off site, where possible this will be undertaken by the same tippers used for incoming supply of aggregate. 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 S Volume 3, Appendix 13-1: Transport Assessment [REP3-065 and REP3-066] allow a buffer (17% of total	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			movements) for general construction activities, including the removal of spoil, other construction waste and the installation and removal of construction compounds. - A breakdown of Solar PV Sites Trip Generation Calculations is provided at Annex E to ES Volume 3, Appendix 13-1: Transport Assessment [REP3-065 and REP3-066] . This presents specific assessed quantities of material volumes and component type/numbers for each Lime Down Solar PV Site. Includes fencing, aggregates for access tracks, PV modules and mounting structures substation equipment. - The impact of these trips in the ES and Transport Assessment has been assessed based on worst case assumptions, including all phases and Solar PV Sites being constructed simultaneously and a 50% uplift to represent a peak	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			day. This approach overestimates the trip generation in the construction period. The worked example below illustrates this: • The construction route to Lime Down A-C included in S Volume 3, Appendix 13-1: Transport Assessment [REP3-065 and REP3-066] includes a peak day trip generation of 50 HGVs based on the worst-case assumptions, assuming all phases and Solar PV Sites being constructed simultaneously, plus a 50% uplift; • 50 HGVs represents an estimate of the deliveries on a peak day, so does not represent a daily average; • The daily average number of HGV construction movements is only 32 per day/7 per hour/one every 8 minutes (less than the journey time along the route); • assuming a realistic construction programme, the average number of HGV construction movements along the route to Lime Down A-C is only	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			17 per day/less than 3 per hour/one every 25 minutes (less than the journey time along the route). At Deadline 4 plans (6.2 Environmental Statement Volume 2, Figure 13-5 Abnormal Load Routes - Solar PV Sites (Rev 2) and Figure 13-6 Abnormal Load Routes - Cable Route Corridor (Rev 2) [EN010168/APP/6.2]) will be submitted showing the proposed widening and passing places including geometries. Meeting with Stop Lime Down and Wiltshire Council highways will be sought to discuss this matter further. Additional NMU surveys will also be submitted at Deadline 5.	
3.9.6	HGV construction traffic levels assessment	The Council does not agree that HGV increases of 30% at eight locations is not significant and considers that an increase in HGV movements on a narrow, rural road with limited passing opportunities presents a genuine highway safety risk. Without sufficient carriageway width or passing places to allow two articulated HGVs to pass	The potential impact on 'Road User and Pedestrian safety' has been assessed in S Volume 3, Appendix 13-1: Transport Assessment [REP3-065 and REP3-066] in accordance with the ISEP Guidelines. In relation to comments on passing opportunities please refer to the	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		safely, the impact should be treated as significant and requiring mitigation.	Applicant's position on construction routes (see Reference 3.9.4 above). At Deadline 4 plans (6.2 Environmental Statement Volume 2, Figure 13-5 Abnormal Load Routes - Solar PV Sites (Rev 2) and Figure 13-6 Abnormal Load Routes - Cable Route Corridor (Rev 2) [EN010168/APP/6.2]) will be submitted showing the proposed widening and passing places including geometries. Meeting with Stop Lime Down and Wiltshire Council highways will be sought to discuss this matter further. Additional NMU surveys will also be submitted at Deadline 5.	
3.9.7	HGV construction traffic levels assessment – Cable Route Corridor	The ES notes that most HGVs will be 10 m tipper trucks, with additional abnormal indivisible load (AIL) movements for cable drum deliveries. Wiltshire Council highlights the need for the Transport Assessment to demonstrate that these vehicles can safely pass along the affected minor roads and to clearly identify which roads will be used for AIL access, as	The change in HGV flows will be small in absolute terms at each Cable Route Corridor Access Point (4 HGVs per day, equivalent to one movement per hour for 90 days during construction times). Each access has been tracked to demonstrate access for a 10m tipper truck, these are shown in Drawings SK101 to SK128, contained in Annex D of S Volume 3, Appendix 13-1:	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		some may be unsuitable due to width or alignment constraints.	Transport Assessment [REP3-065 and REP3-066] . The Cable Route Corridor Access Routes for AIL vehicles are shown in ES Volume 2, Figure 13-6: Abnormal Indivisible Load Routes: Cable Route Corridor [APP-151]. The swept-path of AIL movements along these routes has been undertaken at key points as presented in Appendix D of the Outline CTMP [REP3-1]. This demonstrates that the AIL movements for can be accommodated. At Deadline 4 plans (6.2 Environmental Statement Volume 2, Figure 13-5 Abnormal Load Routes - Solar PV Sites (Rev 2) and Figure 13-6 Abnormal Load Routes - Cable Route Corridor (Rev 2) [EN010168/APP/6.2]) will be submitted showing the proposed widening and passing places including geometries. Meeting with Stop Lime Down and Wiltshire Council highways will be sought to discuss this matter further. Additional NMU surveys will also be submitted at Deadline 5.	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
3.9.8	Sensitivity assessment	The Council considers that the sensitivity of construction routes to Lime Down Sites A–C and D–E does not address highway safety or operational impacts, and therefore evidence is still required to demonstrate adequate passing opportunities for two HGVs along the entire access route.	The Applicant notes the agreement of the 'Sensitivity' classification of the specified roads on the construction routes. The section of the construction route between Hullavington Crossroads and Bradfield Cottages does not include any additional receptors to those on the section between the A429 and Hullavington Crossroads as per the Sensitivity Definitions provided in Table 13-3 of ES Volume 1, Chapter 13-1: Transport and Access [REP3-019]. This section of road has therefore been classified as 'Low' sensitivity. The potential impact on 'Road User and Pedestrian Safety' has been assessed in ES Volume 1, Chapter 13-1: Transport and Access [REP3-019] in accordance with the ISEP Guidelines. In relation to comments on passing opportunities please refer to the Applicants above position on construction routes (Reference 3.9.4).	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			At Deadline 4 plans (6.2 Environmental Statement Volume 2, Figure 13-5 Abnormal Load Routes - Solar PV Sites (Rev 2) and Figure 13-6 Abnormal Load Routes - Cable Route Corridor (Rev 2) [EN010168/APP/6.2]) will be submitted showing the proposed widening and passing places including geometries. Meeting with Stop Lime Down and Wiltshire Council highways will be sought to discuss this matter further. Additional NMU surveys will also be submitted at Deadline 5.	
3.9.9	Impact Assessment – Fosse Way	Wiltshire Council does not agree that there will be minor adverse impacts on the Fosse Way. Due to the narrow carriageway and long sections with limited passing meaning the road may not safely accommodate HGVs, including two-way HGV traffic. Additionally, the route from Dyson Roundabout to Bradfield Cottages is not assessed, despite predicted high HGV flows and concerns about two-way passage, particularly northwest of the Hullavington crossroads.	See the Applicants above position relating to construction routes (Reference 3.9.4). As set out in the Outline CTMP [REP1-108] , pre-construction, interim and post-construction Road Condition Surveys will be undertaken to repair any damage caused to verges during the construction period. The details of these surveys will be confirmed as part of the Final CTMP.	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			At Deadline 4 plans (6.2 Environmental Statement Volume 2, Figure 13-5 Abnormal Load Routes - Solar PV Sites (Rev 2) and Figure 13-6 Abnormal Load Routes - Cable Route Corridor (Rev 2) [EN010168/APP/6.2]) will be submitted showing the proposed widening and passing places including geometries. Meeting with Stop Lime Down and Wiltshire Council highways will be sought to discuss this matter further. Additional NMU surveys will also be submitted at Deadline 5.	
3.9.10	Residual effects (construction)	The ES concludes there are no significant residual transport effects from construction. However, the Council disagrees, noting that minor roads serving Lime Down Sites A–D are often too narrow for safe HGV/car passage, with Annex H showing that two-way HGV passage has not been assessed. Given the high predicted HGV traffic, particularly to Bradfield Cottages (Site D), the Council considers the risk of HGV conflicts	See the Applicants above position relating to construction routes (Reference 3.9.4). At Deadline 4 plans (6.2 Environmental Statement Volume 2, Figure 13-5 Abnormal Load Routes - Solar PV Sites (Rev 2) and Figure 13-6 Abnormal Load Routes - Cable Route Corridor (Rev 2) [EN010168/APP/6.2]) will be submitted showing the proposed widening and passing places including geometries. Meeting with Stop Lime Down and	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		significant, yet no mitigation or highway improvements are proposed.	Wiltshire Council highways will be sought to discuss this matter further. Additional NMU surveys will also be submitted at Deadline 5.	
3.9.11	Significance of effects - operation	During the operation phase, vehicle traffic will be minimal, using permanent accesses created or improved for construction. Adequate hard standing turning areas will be provided within the sites to allow maintenance vehicles to exit in forward gear, which Wiltshire Council considers acceptable.	The Applicant notes Wiltshire's position	Agreed
3.9.12	Draft DCO Provisions	Wiltshire Council's Highways Development Management officer is concerned about control over works within the public highway, ensuring that site access and construction works meet adoptable standards. While the Applicant suggests that a separate s278 Agreement is not needed because DCO Articles 10 and 15 provide powers for street alterations, the Council notes that Article 15 uses the word "may", implying the undertaker is not obligated to enter an Agreement.	As agreed with Wiltshire Council on 14 April 2026, the Applicant has prepared draft protective provisions for the protection of the Local Highway Authority which have been shared with Wiltshire Council for comment. Subject to any comments on the draft protective provisions that Wiltshire Council might have, the Applicant intends to include these protective provisions in the Draft DCO [REP3-005] at a future deadline. The Applicant is confident that the form of the protective provisions can be	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		The Council's stance is that consent under Article 10(4) should explicitly require an Agreement under Article 15, incorporating provisions similar to the Council's standard s278 Agreement template, to ensure proper oversight and compliance with highway standards.	agreed with Wiltshire Council prior to the close of the Examination. The Outline CTMP [REP1-108] submitted at Deadline 1 also included the following updates that address the points raised: • Further clarifications as to what drawings might be provided for accesses in the Final CTMP; • Further clarifications as to what monitoring/reporting/actions would be implemented in cases where proposed construction routes are not followed (e.g. training/retraining); and • Further clarifications as to how damage to highways would be identified and fixed during the construction/decommissioning phases.	
3.9.13	Draft DCO – Article 14	Article 14 of the DCO appears to automatically approve all accesses listed in Schedule 7, without requiring technical approval by the Council. The Applicant argues that detailed design approval will be addressed through the	The Council's interpretation of article 14 is correct. The accesses listed in Schedule 7 are permitted by virtue of the DCO and do not require any further consent from the highway authority. The physical laying out of the accesses	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		Construction Traffic Management Plan (CTMP). The Council's stance is that the CTMP does not replace the need for formal highway agreements under Article 15. Such agreements should cover: • Technical approval of all permanent highway works, not just matters in the CTMP • Bond requirements and indemnities protecting the Council • Inspection, supervision, and sign-off during construction, including associated fees The Council considers these agreements essential to ensure proper oversight, safety, and accountability for works in the public highway.	is carried out pursuant to the power in article 10 (power to alter layout, etc., of streets) and controlled by provisions in the Outline CTMP [REP3-108]. Detailed design drawings and Stage 2 Road Safety Audits will be provided as part of the Technical Approval process secured by a requirement of the DCO. The Outline CTMP [REP3-108] has been updated to confirm this and submitted at Deadline 1 of Examination. As agreed at a meeting between the Applicant and Wiltshire Council on 14 April 2026 that the Draft DCO [REP3-005] has been updated for Deadline 1 to include protective provisions for the benefit of Wiltshire Council as highway authority to address the concerns raised by Wiltshire Council relating to the streets works and highways powers in the Draft DCO [REP3-005].	
3.9.14	Street works & Permit Scheme (Articles 8 & 9)	Wiltshire Council considers that the Applicant must obtain permits to carry out any works in the public highway,	Article 8(2) provides the Applicant with a statutory right to carry out street works for the purposes of sections 48(3) and 51(1) of NRSWA. Section	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		including installing cables, ducts, or access points. The Council require the following further detail: - the specific works that will be carried out at each highway location. - traffic management measures, including whether road closures or other controls will be required. - access arrangements, including whether new accesses are temporary or permanent and what permissions will be used. - the number and locations of traffic management for large joint bays/pits that may require significant traffic management. - Potential conflicts with existing underground infrastructure, requiring confirmation that surveys have been undertaken.	48(3) confirms that, in Part 3 of NRSWA, “undertaker” means a person “by whom the relevant statutory rights is exercisable ... or a licensee under a street works licence, as the case may be”. Section 51(1) of NRSWA confirms that is an offence to place apparatus in a street unless in pursuance of a statutory rights or a street works licence. Article 8(2) therefore provides the statutory right for the Applicant to lay cabling forming part of the Scheme (being street works) pursuant to a statutory right, and no separate street works licence is required. The details of these works, including traffic management measures and the programme, will be agreed at the technical approval/detailed design stage. Road space booking will still be required under the Council’s permit scheme, which is applied to street works carried out under the DCO by Article 9. The land plans set out the extent of compulsory acquisition and temporary	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		- Construction compounds and vehicle crossovers require clarity and appropriate licensing. - Abnormal loads must follow the council's notification and procedures. - Traffic survey data needs to be clarified and published. - Construction programme and traffic management plans must be shared and approved by the council. - Temporary signage and permits must be approved by the council. - All works must comply with Wiltshire Council's permit scheme and specifications. - Inspection units must also be agreed between the streetworks team and applicant for the works on the cable route corridor - All reinstatements must adhere to the SROH and this must be reflected in the scheme documents.	possession powers required within the Order Limits. The Works Plans should be read in conjunction with Schedule 1 of the draft DCO. The detail of the traffic regulation measures required in each area will be identified post-consent, and these details will be submitted to the relevant highway authority, as required by the CTMP. Clarity on whether an access is temporary, permanent or semi-permanent is provided in Table 13-19 and Table 13-32 in ES Volume 1, Chapter 13-1: Transport and Access [REP3-019]. Article 14 of the DCO provides for the creation of these accesses, with any dropped kerb or similar being carried out under article 10 and completed maintained to the satisfaction of the relevant street authority in accordance with article 11. Temporary accesses will be restored to the satisfaction of the street authority under article 10. No separate licence or agreement is required, as the DCO provides the necessary consent for	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		Whilst the council accepts that the permit scheme and specification is covered in Article 9, it is considered that there is still a contradiction in that if a permit for some works needed a road closure, this would make it a Major Permit which requires 3 months' notice and ties into the normal 12 week closure process. Whilst the council is willing to accept a compromise of 8 weeks closure notice, the proposed 4-week timescale is not acceptable as it would inevitably lead to conflicts on the network due to other promoters already having booked the road space in the normal timely manner. Furthermore, more certainty and clarity is required on how a pre-existing route booking by another promoter would be dealt with. For example, would the Applicant expect the other promoter to change their date, and if so, who would pay the administrative costs of changing their Order and possible abortive work on their behalf. The council requires a level-playing field so that it can coordinate all works on the network for the benefit of all.	these works, however the design of the accesses will be completed in conjunction with the local highway authority as required by the Outline CTMP [REP3-108]. In response to the query included at paragraph 14.13 regarding the potential for joint bays to be located within the highway network, the cable route is defined by the Order Limits of the DCO. The majority of this is within fields and it is therefore extremely unlikely that a joint bay would ever be required beneath the highway. The Order Limits provide enough space for a choice of routing options where it runs along or across the highway network. The normal procedure for ALL deliveries will be followed. This is set out in Section 5.5 of the Outline CTMP [REP3-108]. Traffic counts are included in Annex A of ES Volume 3, Appendix 13-1: Transport Assessment [REP3-065 and REP3-066].	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		Additionally, the council considers that a fortnightly (at first for the cable route corridor especially) liaison meeting should be held with Wiltshire's Network Management Team to check progress against plan and discuss any issues that might need addressing, e.g. reducing a speed limit for safety that has only come to light after works at a certain point have started. Furthermore, the Applicant is asked to clarify whether Forward Planning Notices will be raised for all road and cable works, in order to give the council visibility of the planned works. This would also enable the council to prioritise these works, as the permit process is typically authorised on a first-come, first-served basis. Forward Planning Notices could reserve the road space, based on the Applicant's project plan.	Details as to the location of the construction compounds are provided in the Land Plans [REP1-004] and Works Plans [REP1-005] under Works Number 5A(v). They are located outside of the Highways extent and will be sited in those locations temporarily for the purpose of construction. All works in private land will be reinstated following completion of the works. Details relating to how the construction areas will be accessed are provided in ES Volume 1, Chapter 13: Transport and Access [REP3-019]. The design of the access and egress from the highways will be completed in conjunction with the local highway authority as set out within the Outline CTMP [REP1-108]. At Deadline 4 plans (6.2 Environmental Statement Volume 2, Figure 13-5 Abnormal Load Routes - Solar PV Sites (Rev 2) and Figure 13-6 Abnormal Load Routes - Cable Route Corridor (Rev 2) [EN010168/APP/6.2]) will be submitted showing the proposed widening and details of works and passing places	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			including geometries. Information has been provided to Stop Lime Down in relation to trip generation and further meetings will be held with Stop Lime Down and Wiltshire Council highways will be sought to agree a position on trip generation. Additional NMU surveys will also be submitted at Deadline 5.	
3.9.14.1	Draft DCO	Further to the discussion at ISH3 and ISH4 and given the Applicant's assertions that all approval / permitting processes are set out and governed through the CTMP, the council considers that the DCO Articles should make explicit reference to the Construction Traffic Management Plan (CTMP). This would provide more clarity on the processes to be followed.	The Applicant notes that the CTMP is secured by Requirement 15 of the Draft DCO [REP3-005] , which secures compliance with detailed CTMPs to be approved by the relevant planning authority. It is not considered appropriate or necessary to duplicate this requirement within the articles, and doing so would be contrary to Statutory Instrument Drafting best practice.	Under Discussion
3.9.14.2	Draft DCO and CTMP	The statutory Safety at Street Works and Road Works – A Code of Good Practice (October 2013), which is mandatory for all promoters, defines the minimum widths for two-way working (page 53). For normal working	This guidance relates to undertaken works in the highway and maintaining a two-way width. Temporary signals would allow shuttle working for installation of access junctions for	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		traffic that includes buses and HGVs, the minimum is 6.75m. It can only be reduced to 5.5m if it is cars and light traffic only. The council is concerned that a H&S enquiry would utilise the statutory Code of Good Practice, therefore the Applicant is required to justify any proposed deviation within the scheme documentation.	example, Shuttle working would require a width of 3.5m running lane. Page 53 of the Red books states 3.25–3.50 m desirable width range 3.0 m absolute minimum for shuttle working.	
3.9.15	Draft DCO	The Council consider that the DCO appears to permanently override existing legislation, and the Council seeks clarification on whether this applies for the full operational life of the development. The draft DCO does not provide for statutory inspection of street works, despite the highway remaining a Council asset that must be reinstated to required standards. While Section 58 protections may cause challenges, they do not prevent works and should be managed through agreed solutions such as full- or half-width reinstatements. The proposed 4-week timescale for Temporary Traffic Regulation Orders	The Planning Act 2008 was enacted as a result of the need for a streamlined consenting regime for infrastructure projects. A key aim of the Planning Act 2008 was to create a 'one stop shop' for all the consents, licences and permits required for a project. The approach to drafting the DCO is extensively precedented, as set out in the Explanatory Memorandum [REP1-009]. Article 8 (street works) of the draft DCO provides the Applicant with a statutory right to carry out the street works authorised by the DCO, before expressly applying Part 3 of NRSWA to those street works, save where the	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		(TTROs) is considered unrealistic and contrary to the national 12-week standard, with no flexibility for longer periods. Several provisions in Part 3 conflict with existing legislation and impose unreasonably short timescales for approvals, publicity, and agreements.	Applicant is also the street authority for the street in question. Article 9 (application of the permit schemes) applies the Councils' Permit Schemes with minor modifications needed to ensure that it does not constitute an impediment to the implementation of the Scheme. This is considered appropriate to ensure that this critical national priority infrastructure can be delivered without delay. The Applicant notes that the Council may still impose conditions on the carrying out of works under the permit scheme, such as the full width and half width reinstatements mentioned; the article merely restricts the ability to require works to not be carried out for a period under sections 58 and 58A of NRSWA. The Council's comments referring to "Part 3(12)" and "Part 3(16)" both appear to relate to article 16 (traffic regulation measures) of the draft DCO. Article 16 requires the Applicant to provide 4 weeks notice before it makes provision for traffic regulation which	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			has effect as though it were a duly made traffic order. The Applicant is able to make traffic orders for the purposes of the construction, maintenance and decommissioning of the authorised development. This purpose differs from the purposes for which a traffic authority may make temporary traffic regulation orders (TTRO) under section 14 of the Road Traffic Regulation Act 1984 (the 1984 Act). Any TTRO made by the traffic authority may only be for a maximum 18 month period. Including this power within the DCO ensures that necessary traffic regulation can be put in place for the needed duration without placing any additional burden on Council resources, whilst also avoiding any concern that traffic order made by the traffic authority for the purposes of the authorised development would not comply with the purposes listed in section 14 of the 1984 Act. The Council's usual timeframe for making TTROs is therefore not relevant as it is the Applicant that will be making the traffic regulations.	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
3.9.16	Works Plans [APP-007]	The submitted Works Plans only include highway improvements for Works Numbers 8A and 8B, leaving other minor roads used to access Lime Down Sites A-D without scope for any highway mitigation measures under the DCO, despite significantly increased HGV traffic during the construction phase. The council considered this exclusion unacceptable, unless robust evidence shows upgrades are unnecessary. Without such evidence, these minor routes should be included in Works 8A or 8B to allow for mitigation measures such as passing bays or localised road widening to facilitate two-way passage opportunity for opposing HGVs as may be deemed required or necessary.	With regard to comments relating to passing opportunities on the following links, please refer to above position on construction routes. - Lime Down Site A-C: Unnamed road between Fosse Way and Sherston: Circa 1.1km from the Fosse Way junction. - Lime Down Site D: Unnamed road between the roundabout junction with Wellington Place Road and Bradfield Cottages - circa 1.7km As construction traffic is proposed to access the eastern part of Lime Down D via Access 10 and Lime Down E via Access 18, an assessment of the following minor roads was not included in ES Volume 3, Appendix 13-1: Transport Assessment [REP1-057 and REP1-059]. - Lime Down Site D: Unnamed road between the Bradfield Cottages / The Street junction and the proposed secondary access point to Lime Down Site D - circa 460m	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			- Lime Down Site E: Rodbourne Road - Lime Down Site E: The unnamed adoptable highways which are proposed for construction access to the south of Rodbourne Road. At Deadline 4 plans (6.2 Environmental Statement Volume 2, Figure 13-5 Abnormal Load Routes - Solar PV Sites (Rev 2) and Figure 13-6 Abnormal Load Routes - Cable Route Corridor (Rev 2) [EN010168/APP/6.2]) will be submitted showing the proposed widening and details of works and passing places including geometries.	
3.9.17	Streets Plans [APP-008]	The sections of highway highlighted in the draft DCO correspond only to Works Numbers 8A or 8B, meaning the DCO currently does not allow for wider highway improvements. As a result, there is no provision to carry out necessary upgrades along Farhill Lane or the route between the A429 and Bradfield Cottages, should	See above position relating to construction routes (Reference 3.9.4).	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		improvements be required to safely accommodate two-way HGV traffic.		
3.9.18	Access points for construction works	The Council supports the proposed construction route into Lime Down Site E, which is via a new access Location 18 on the A429 south of Corston. An additional access in the same location (Location 10) serves the cable route area between the A429 and Lime Down D.	The Applicant notes this position.	Agreed
3.9.19	Alternative construction routes to Lime Down Sites A-C	ES figures assess alternative construction routes to Lime Down Sites A–C. While the route via the M4, A46, B4040, B4039, Fosse Way is agreed to be the best option, Highway Improvement Areas are only identified in four locations, mostly far south of the Lime Down sites. The Council is concerned that the unnamed road between Fosse Way and Sherston (serving Site A) is excluded, as well as Fosse Way, leaving uncertainty about whether either of these minor roads will be adequate for accommodating two-way HGV traffic without mitigation.	See above position relating to construction routes (Reference 3.9.4). At Deadline 4 plans (6.2 Environmental Statement Volume 2, Figure 13-5 Abnormal Load Routes - Solar PV Sites (Rev 2) and Figure 13-6 Abnormal Load Routes - Cable Route Corridor (Rev 2) [EN010168/APP/6.2]) will be submitted showing the proposed widening and details of works and passing places including geometries.	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
3.9.20	Access route to Site E	Wiltshire Council supports the revised the access route to Site E which removes the use of Grange Lane and Rodbourne Road and instead takes direct access from the A429 via a new access south of Corston, as the minor roads are unsuitable for regular articulated HGV traffic.	The Applicant notes this position.	Agreed
3.9.21	Draft DCO Order - Road Safety Audit	The Council considers a Stage 1 Road Safety Audit for access junctions, to be insufficient. The council seeks mandatory submission and approval of detailed design and construction drawings, supported by a Stage 2 Road Safety Audit, in line with normal requirements under a section 278 agreement.	The Council's normal requirements in relation to access points is noted. Paragraph 13.11.1 of ES Volume 1, Chapter 13: Transport and Access [REP3-019] has been updated to specify the requirement for a Stage 1 and Stage 2 Road Safety Audit and has been submitted at Deadline 1 of Examination. Article 11 of the draft DCO requires permanent works to be carried out to the reasonable satisfaction of the street authority.	Under Discussion
3.9.22	Preliminary access drawings	The Council are concerned that Article 14 appears to treat all accesses in Schedule 7 as approved in principle, despite the drawings being only indicative. This is considered unacceptable, as full technical details	See the Applicants above position relating to Draft DCO Provisions (Reference 3.9.12), the Draft DCO (Reference 3.9.13) and 3.9.15 and Street Works (Reference 3.9.14).	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		(required under a section 278 agreement) have not been provided.		
3.9.23	Preliminary access drawings – Cable Route Corridor	The Council considers deemed consent under Article 14 unacceptable and considers that the DCO should include a requirement for full submission and approval of temporary access designs by Wiltshire Council's Network Management team.	See the Applicants above position relating to Draft DCO Provisions (Reference 3.9.12), the Draft DCO (Reference 3.9.13) and 3.9.15 and Street Works (Reference 3.9.14).	Under Discussion
3.9.24	Draft DCO – Articles 10, 11 and 14	The Consents and Agreements Position Statement notes that most highway consents are addressed in the Draft DCO (Articles 10, 11, 14). However, the Council is concerned that this effectively gives deemed consent for access works even when design details are absent, and there is no requirement for technical approval by Wiltshire Council, leaving the Council unable to ensure works meet adoptable standards.	See the Applicants above position relating to Draft DCO Provisions (Reference 3.9.12), the Draft DCO (Reference 3.9.13) and 3.9.15 and Street Works (Reference 3.9.14).	Under Discussion
3.9.25	Outline Construction Traffic	The Council suggests it may be preferable to have separate CTMPs for different Lime Down Sites, unless sites share construction routes or concurrent works. Section 2.3 of the Outline	The Outline CTMP [REP3-108] has been updated to specify an option for separate Final Construction Traffic Management Plans to be prepared for each Lime Down Solar PV Site and the	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
	Management Plan	Construction Traffic Management Plan [APP-287] requires detailed design submissions to the highway authority, which has welcomed however, the Council notes it does not replace the need for formal highway agreements under Article 15 of the draft DCO.	Cable Route Corridor. This was submitted at Deadline 1 of Examination. In regard to Section 2.3, see the Applicants above position relating to Draft DCO Provisions (Reference 3.9.12), the Draft DCO (Reference 3.9.13) and 3.9.15 and Street Works (Reference 3.9.14).	

3.10 Noise and Vibration

Table 3-10: Noise and Vibration

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
3.10.1	Legislation and Policy	Wiltshire Council provided no comment on legislation and policy	The Applicant considers that ES Volume 1, Chapter 14: Noise and Vibration [REP1-021] has identified and appropriately considered all applicable legislation and policy.	Agreed
3.10.2	Methodology	The methodology and LOAEL and SOAEL are broadly appropriate, although contextual reasoning around noise is required.	The methodology adopted within ES Volume 1, Chapter 14: Noise and Vibration [REP1-021] has been derived from the information obtained through consultation with stakeholders and by reviewing relevant guidance and studies and is considered acceptable. An extra paragraph on the local soundscape and context has been added to Section 14.10 of the ES chapter.	Agreed
3.10.3	Baseline	Wiltshire Council provided no comment on the baseline used for assessment.	The baseline conditions which are detailed in ES Volume 1, Chapter 14: Noise and Vibration [REP1-021] are representative of the baseline sound environment in the study area.	Agreed

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
3.10.4	Assessment Results	Wiltshire Council notes that Table 8 of Appendix 14-4 Noise Modelling [APP-237] shows that there is one receptor (R10) that has been classed as SOAEL* (+5dB above the background LA90) for daytime operational noise. BS 4142:2014 states that a difference of +5 dB is likely to be an indication of an adverse impact. However, Table 14-23 Operational Noise Results Summary states that no daytime receptors are above SOAEL. This is a significant discrepancy and as a result, the council requires the following for R10: A breakdown of each operational noise source i.e. conversion units, solar PV panels (tracking structures), transformers and battery inverters that contributes towards daytime noise levels; A BS4142 rating calculation; and Additional analysis setting out proposed mitigation in order to ensure daytime levels fall <5dB.	Calculated levels at R10 are less than 5 dB above the background and not above SOAEL. However, when rounded to the nearest decibel, they are 5 dB above background and at the SOAEL, as reported in Table 8 of ES Volume 3, Appendix 14-4: Noise Modelling [REP1-061]. The Applicant accepts that this could appear as a discrepancy and has provided a breakdown of the daytime operational noise sources at R10 in their response to the relevant representation. This demonstrates that the central BESS area is the dominant noise source at R10. Additional analysis indicates that a level below SOAEL, even when rounded, could be achieved with 85% of the BESS containers being fitted with air-cooled heat exchangers (as opposed to the 75% reported in the ES). This would bring the contribution of the BESS containers in the table below to less than 27 dB and the rating level in the right-hand column down to 34 dB.	Agreed

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			While the Applicant is not committing to this mitigation explicitly, to maintain design flexibility, the Outline OEMP [REP3-092] has been amended to clarify that levels at all receptors from the final design would be below SOAEL. Following the submission of a revision of ES Volume 3, Appendix 14-4 Noise Modelling [REP1-061], to correctly reflect the baseline levels derived in ES Volume 3, Appendix 14-3: Baseline Noise Survey [APP-236], levels at R10 are only 1 dB above background (4 dB below SOAEL). The commitment to the rating level in the Outline OEMP [REP3-094] at R10 remains the same.	
3.10.5	Mitigation / Management Plans – communication strategy	Wiltshire Council request that as part of the communication strategy, residential dwellings on Silver Street must be informed of dates, times and duration of any construction activities taking place in the vicinity of their residence. Table 8 [APP-277] should therefore be	The Outline CEMP [REP3-092] has been updated to clarify that: <i>“The detailed CEMP(s) will also set out a scheme for the provision of monthly reporting information to and from local residents to advise of potential noisy works that are due to take place and for monitoring of noise complaints and</i>	Agreed

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		amended to include this as a specific measure.	<i>reporting to the Applicant for immediate investigation and action. Such a scheme would include informing residents in locations identified in Chapter 14: Noise and Vibration of the ES, such as those on Silver Street, of the dates, times and duration of construction activities in their vicinity."</i>	
3.10.6	Mitigation / Management Plans – Temporary Acoustic fencing	Table 8 of the oCEMP [APP-277] states that "depending on the location, plant and timing of works, temporary acoustic fencing will be installed around the HDD site boundary to screen receptors from noise emission". This negatively worded commitment should be amended to one that is positively worded, for example - 'Temporary acoustic fencing provides up to 10dB of attenuation. Temporary acoustic fencing will be installed around the HDD boundary to screen those receptors identified as having an 'above SOAEL' effect level as set out in Table 14-20 HDD Locations and Receptors of the Noise and Vibration Assessment (Chapter 14 of the ES)'.	The Outline CEMP [REP3-092] has been updated to adopt this approach: "Temporary acoustic fencing will be installed around the HDD boundary to screen those receptors identified as having an 'above SOAEL' effect level as set out in Table 14-20 of ES Volume 1, Chapter 14: Noise and Vibration [REP1-021] ."	Agreed

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
3.10.7	Mitigation / Management Plans -BESS	Table 8 of the oOEMP [APP-278] does not provide the required level of precision necessary to ensure that the required level of mitigation is secured via Requirement 14 of the draft Order because it does not specify the % or number of silencer units for BESS containers, BESS inverters or Conversion units, nor does it specify that all 132kv and 400kv substation transformers will be housed in enclosures. As such, no firm commitments are given in relation to minimum mitigation requirements. By not committing to specific mitigation and actions, it will not be possible for the council to identify whether the necessary mitigation required to protect amenity has been installed.	The Applicant is purposefully not committing to specific plant mitigation to provide flexibility in the final design. As discussed with Wiltshire Council on the 20 February 2026, the Outline CEMP [REP3-092] has been updated to clarify this point and provide assurance that updated calculations will be provided to the council: <i>“The Applicant commits that noise at sensitive receptors will be no higher than the levels presented in Section 14.10 of Chapter 14: Noise and Vibration of the ES [EN010168/APP/6.1] and these levels will be set out in the detailed OEMP. The Applicant will remodel operational noise from the Scheme with respect to the final design, including required plant mitigation, to demonstrate that there would be no significant operational noise effects arising from the Scheme as built. The results of this remodelling, including details of the final plant mitigation measures, will be submitted to the relevant local authority.”</i>	Agreed

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
3.10.8	Mitigation / Management Plans	The council considers that the commitment to submit noise monitoring results does not go far enough. No details are provided concerning: a) where the monitoring will be undertaken b) timescales concerning the location and frequency of monitoring c) how frequently the monitoring data will be submitted to the local authority d) the timescales the developer will undertake further maintenance or mitigation when the review indicates plant noise levels have exceeded acceptable levels as identified in the ES. The OEMP will need to include a map/plan showing precise locations of the proposed monitoring locations close to the BESS units. Each monitoring location must have a maximum noise threshold (in accordance with noise levels predicted by the noise modelling software used in	The Outline CEMP [REP3-092] has been updated to address these concerns and provide some further detail as follows: <i>“Site staff will carry out annual monitoring and maintenance of equipment as close as practicable to the BESS units, inverters, conversion units and transformers.</i> <i>The monitoring, which will take place during the summer when cooling fans are likely to be at their loudest, will include identifying any changes in sound pitches or volume early and carrying out the relevant maintenance. This ensures that plant noise at sensitive receptors throughout the operational lifetime of the Scheme is not materially worse than the levels presented in the ES.</i> <i>The results of such monitoring will be submitted to the relevant planning authority for review within 4 weeks of the survey. Where this review indicates plant noise levels generated by the Scheme have materially increased, the report to the local authority will include</i>	Agreed

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		the ES) which, if exceeded, will trigger corrective actions to resolve the issue.	<i>an action plan and appropriate timescales for resolving the issue. The undertaker and relevant planning authority will then liaise in respect of any further maintenance or mitigation required to reduce levels at receptors back to those presented in the ES.</i> <i>In the case of third-party complaints about noise correction actions will be taken by the Environment Manager and recorded as outlined in Section 6.2.</i> <i>Further details are to be confirmed in the detailed OEMP(s)."</i> The detailed OEMP will include a plan showing the locations of the monitoring around the central BESS area together with maximum noise thresholds, to be determined at the detailed design stage, once the remodelling, described in response to 3.10.7 above, has been completed. Such monitoring is likely to take place to the north, east and west of the central BESS area to capture to noise in the direction of the closest residential properties, and the noise thresholds will be designed to avoid	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			significant effects at residential receptors, as discussed in 3.10.4.	

3.11 Air Quality

Table 3-11: Air Quality

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
3.11.1	Legislation and Policy	Wiltshire Council provided no comment on legislation and policy.	The Applicant considers that ES Volume 1, Chapter 15: Air Quality [REP2-008] has identified and appropriately considered all applicable legislation and policy.	Agreed
3.11.2	Methodology	Wiltshire Council provided no comment on the methodology used for the assessment.	The methodology adopted within ES Volume 1, Chapter 15: Air Quality [REP2-008] has been derived from the information obtained through consultation with stakeholders and by reviewing relevant guidance and studies and is considered acceptable.	Agreed
3.11.3	Baseline	Wiltshire Council provided no comment on the baseline presented.	The baseline conditions which are detailed in ES Volume 1, Chapter 15: Air Quality [REP2-008] are representative of the baseline site conditions.	Agreed
3.11.4	Assessment Results	The ES Chapter 15 Air Quality [APP-067] report confirms that with the oCEMP in place, the effects arising from the operation and maintenance of	The assessment results set out within ES Volume 1, Chapter 15: Air Quality [REP2-008] , including likely significant effects anticipated, are acceptable.	Agreed

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		the Scheme are likely to be not significant.		
3.11.5	Mitigation / Management Plans	The council consider that the mitigation set out in the oCEMP, is broadly satisfactory for the purposes of controlling unacceptable air quality impacts associated with the construction and demolition phases of the development.	The proposed mitigation measures set out within ES Volume 1, Chapter 15: Air Quality [E REP2-008] , and secured within Section 3.10 of the Outline CEMP [REP3-092] , Outline CTMP REP3-108 , Outline BSMP [REP3-106] , Outline OEMP [REP3-094] and Outline Decommissioning Strategy REP3-096] referenced in Schedule 2 of the Draft DCO [REP3-005] are considered acceptable.	Agreed

3.12 Socio-Economic Tourism Recreation

Table 3-12: Socio-Economic Tourism Recreation

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
3.12.1	Legislation and Policy	Wiltshire Council considers that relevant planning policy has been adequately considered as part of the application.	The Applicant considers that ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068] and its supporting Volume 3, Appendix 16-1: Socio-Economics, Tourism and Recreation: Legislation, Policy, Guidance, and Supporting Information [APP-240] has identified and appropriately considered all applicable legislation and policy.	Agreed
3.12.2	Methodology	The Council agree with the methodology used to predict employment numbers during the construction phase and are pleased to note the comprehensive Outline Skills, Supply Chain and Employment Plan (7.20) [APP-285] which if implemented in full, will help to achieve the local employment figures stated. We have some concerns over the number of jobs that will be taken by local residents will not be as many as	The methodology adopted within ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068] has been derived from the information obtained through consultation with stakeholders and by reviewing relevant guidance and studies and is considered acceptable. The Applicant confirms that the Outline SSCEP [REP3-104] is secured by Requirement 18 of Schedule 2 to the Draft DCO [REP3-005] . This includes	Agreed

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		indicated by the applicant due to the low level of unemployment locally.	the requirement for a detailed plan to be submitted to and approved by Wiltshire Council, ensuring that measures to support local employment can be considered and approved in detail ahead of construction commencing.	
3.12.3	Baseline	Wiltshire Council provided no comment on the baseline presented.	The baseline conditions which are detailed in ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068] and its supporting ES Volume 3, Appendix 16-1: Socio-Economics, Tourism and Recreation: Legislation, Policy, Guidance, and Supporting Information [APP-240] are representative of the baseline site conditions.	Agreed
3.12.4	Assessment Results	The Council consider that the main positive economic impact of the scheme will be during the two-year construction of the solar park, followed approximately thirty years later by the decommissioning of the original solar panels and the installation of new ones.	The assessment results set out within ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068] , and the supporting Volume 3, Appendix 16-2 Tourism and Recreation Receptor Tables [APP-241] comprehensively set out the likely	Agreed

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		Wiltshire Council confirm the Applicant's assessment on the impact on tourism in the area is comprehensive and identifies all the tourist sites, rights of way, recreational areas and conservation areas that could be impacted.	impacts to identified receptors likely to be affected by the Scheme.	
3.12.5	Mitigation / Management Plans	Wiltshire Council is concerned that whilst the scheme's construction phase offers short-term GVA uplift and jobs, it will result in the loss of up to 20 FTE agricultural jobs and 50 FTE tourism jobs. There will be a reduction in tourism spending of at least £1.76m per year during construction. The long-term adverse impact on leisure and tourism businesses is contrary to Wiltshire's economic strategy. A mitigation plan is required for local businesses as well as clarity on tenanted farm viability.	The proposed mitigation measures set out within ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068], are considered acceptable, and secured within: • Section 3.11 of the Outline CEMP (OCEMP) [REP3-092]; • Section 3.11 of the Outline OEMP (OOEMP) [REP3-094]; • Section 3.11 of the Outline Decommissioning Statement [REP3-096]; • The Outline PRoWPPMP [REP1-104]; • The Outline LEMP [REP3-100]; • The Outline SSCEP [REP3-104]; and	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			The Outline CTMP [REP3-108]. These measures are secured by Requirements 13, 14, 20, 16, 7, 18, and 15 respectively in Schedule 2 to the Draft DCO [REP3-005]. Where losses to agriculture and tourism employment have been identified, these are worst-case estimates based on likely significant effects from the Scheme, and do not include for additional mitigation measures being applied. The Applicant does not however agree that this effect on tourism employment is significant, accounting for approximately 0.17% of tourism employment and less than 0.15% of the value of the combined tourism industry in Wiltshire (29,000 jobs, £1.2 billion estimated from Visit Wiltshire, 2021). This is also a temporary effect, anticipated to occur during construction, with recovery to tourism businesses anticipated to begin as soon as construction works are complete. Additional mitigation measures through the Outline SSCEP [REP3-104] seek to reduce tourism	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			employment losses through focussing on local recruitment, promoting local suppliers where practicable, and through providing retraining opportunities for workers in agriculture or tourism-dependent industries. The Applicant seeks to clarify that the measures in the Outline SSCEP [REP3-104] are intended to be implemented throughout construction and the operational lifetime of the Scheme to support ongoing skills and employment opportunities. The Applicant understands Wiltshire Council's position that adverse effects to agriculture and tourism are significant is based on the effect to individual businesses. The Applicant's position is based on looking at employment and economic impacts to business sectors over an assessment area. The Applicant does not therefore believe a further mitigation plan is required for local businesses, as it considers the mitigation measures set out in the Outline SSCEP [REP3-104]	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			are applicable to all affected businesses. The Applicant is cognisant of the impact the Scheme could have on wider agricultural employment associated with tenancies and contracts and so seeks to source ways of retaining agricultural workers, providing reskilling opportunities, or providing re employment as supported by the measures secured in the Outline SSCEP [REP3-104]. The Applicant has been in discussions with landowners and these discussions have included arrangements regarding existing tenancies, excluding any subletting arrangements. Whilst a worst case could involve the termination of an agricultural tenancy or contract in its current form, alternative operational and management opportunities are available connected to the Scheme should consent be granted. These will be secured either by direct voluntary arrangement between the respective parties and the Applicant, or through the measures secured in the Outline SSCEP [REP3-104] by Requirement	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			18 in Schedule 2 to the Draft DCO [REP3-005] .	
3.12.6	Mitigation – Public Rights of Way and access	Wiltshire Council request that the Project should: Sign and waymark all Public Rights of Way through the development. Upgrade existing ditch crossings to a minimum width of 1.2 m, using culverts where possible to improve safety, accessibility, and reduce failures of bridges. Provide a point of contact for Wiltshire's Countryside Access Team, updating details within 14 days if changes occur. Consider holding biannual meetings to discuss access and monitor permissive paths, potentially including user groups and Parish Councillors, particularly during construction and the early years of the scheme.	The Applicant is able to commit to improvements or enhancements to PRowWs inside the Order Limits, where those improvements or enhancements would help to mitigate or offset adverse effects on PRowW use as a result of the Scheme. Any financial contribution to PRowW network upgrades beyond this would have to be agreed through the Community Benefit Fund, which operates and is to be agreed outside of the DCO process. Provision of signage and waymarkers for PRowWs can be secured through the detailed design stage by Requirement 5 in Schedule 2 to the Draft DCO [REP3-005]. Where Wiltshire Council PRowW team have recommended improvements to ditch crossings that would require widening of existing crossings, or providing new culverts, these would not be able to be undertaken as part of the DCO as these works would	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			substantially alter the Applicant's approach to watercourses, the Scheme's drainage strategy and ecological mitigation. The Applicant is however happy for these improvements to be undertaken by Wiltshire Council's PRow team and contractors, and is able to commit to funding this through the proposed 'ringfenced' financial contribution in the Community Benefit Fund. General issues and interactions with the Scheme will be headed by the community liaison group, as secured by Requirement 4 in Schedule 2 to the Draft DCO [REP3-005]. Key contact details for leading group members, or specifically the Community Liaison Manager during construction, peak replacement works, and decommissioning, can be shared with Wiltshire's Countryside Access Team. These details would also be available to Parish Council's and key local stakeholder groups.	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
3.12.7	Mitigation - Public Rights of Way	Wiltshire Council is concerned that the development will increase pressure on existing Public Rights of Way (PRoW) as the public seeks to avoid walking among panels. To mitigate this, the Council requests an annual, index-linked contribution of £20,000 for PRoW improvement and enhancement.	The Applicant is able to commit to funding this through a proposed 'ringfenced' financial contribution in the Community Benefit Fund, which operates and is to be agreed outside of the DCO process.	Under Discussion
3.12.8	Mitigation - PRoW General Principles	Wiltshire Council request that all stiles should be removed from within the red line boundary. Any structures that are required for the control of livestock should be the least restrictive option for all structures and gaps will need to comply with BS 5709:2018. Maintenance will need to be planned to make sure that the structures remain compliant with BS 5709:2018. All structures (both existing and new) within the red line will need to be authorised by the highway authority. They will need to be either included within the definitive statement for the path, or they will need to have a 147 authorisation under the Highways Act 1980. If the structure is required to	The Applicant is able to commit to the removal of stiles within the Order Limits to enhance network connectivity. Features on the boundaries of the Order Limits, or on the boundaries of land under freehold acquisition by the Applicant may require gates compliant with BS 5709:2018 ,as neighbouring land may be reserved for grazing. Maintenance of PRoW furniture and water crossings within land under freehold acquisition by the Applicant is their responsibility to maintain, and is secured through the Outline PRoWPPMP [REP1-104] by Requirement 16 in Schedule 2 to the Draft DCO [REP3-005].	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		safeguard the public, then these will need to be authorised under section 66 of the Highways Act 1980.	All additional or altered structures along PRow will be set out at the detailed design stage to be approved by the highway authority, in compliance with the relevant section of the Highways Act 1980.	
3.12.9	PRoW Network Improvements	Following a survey of all the Public Rights of Way within 4 kilometres of Lime Down Sites A, B, C, D and E, the Council will suggest improvements and funding applications will be submitted to the scheme's Community Benefit Fund in addition to the requested index linked £20,000 per annum. The council considers that priority should be given towards funding improvements to the Public Rights of Way network which are in close proximity to the site.	The Applicant is able to commit to improvements or enhancements to PRow inside the Order Limits, where those improvements or enhancements would help to mitigate or offset adverse effects on PRow use as a result of the Scheme. The Applicant is undertaking a review of which locations this includes, and will continue engagement with WC's PRow team to agree the full list of locations that the Applicant can commit to through the DCO process. Any financial contribution to PRow network upgrades beyond this would have to be agreed through the Community Benefit Fund, which operates and is to be agreed outside of the DCO process.	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
3.12.10	Affected PRow and impacts on recreational use	The Council considers that a considerable amount of work is needed particularly with the PRow's affected within the solar park, to ensure that the ability of local residents and other uses of these PRow's to enjoy the full benefits that are currently available continue if this project is consented.	The Applicant has assessed the likely effects on the PRow network as a result of the Scheme in ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068], with individual PRow's assessed in the supporting ES Volume 3, Appendix 16-2 Tourism and Recreation Receptor Tables [APP-241]. This has included all PRow's likely to be affected by the Scheme from the Solar PV Array Sites to those along the Cable Connection Corridor. Although the final Grid Connection Cable route is yet to be finalised, the Applicant has assessed a worst-case scenario where all PRow's within the Cable Route Corridor are assessed as if the cable may cross them. This has been done to ensure the assessment findings are as robust as feasible. The Applicant understands that maintaining functional and beneficial access to PRow's is extremely important to local people, and has committed to the mitigation measures in the Outline CEMP [REP3-092],	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			Outline OEMP [REP3-094], Outline CTMP [REP3-108], and Outline PRowPPMP [REP1-104] (each secured by requirement in Schedule 2 to the Draft DCO [REP3-005]) to ensure PRow access and use is maintained as much as possible during construction, and consistently throughout the operational phase of the Scheme.	
3.12.11	Draft DCO and Control Document Considerations	The Applicant should commit to engagement with Wiltshire Council's Economic Development Team to develop a plan to mitigate the impact on local business, focused on tourism, leisure and retail sectors. This will include a requirement that the applicant should pay compensation to businesses that are able to demonstrate a reduction in income of greater than 10% in a three month period compared to a base year – the year prior to the works taking place - during the construction and decommissioning periods and one following year once these works have been completed.	The Applicant is committed to engagement with the Economic Development Team through the process of agreeing a Statement of Common Ground with Wiltshire Council. The Applicant is happy to use this process to discuss proposed mitigation measures for local businesses. The DCO contains means by which compensation may be available to persons directly impacted by the exercising of powers in the DCO. However, the Applicant does not consider the requirement for compensation to be paid to businesses indirectly affected by the Scheme to be	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		The Applicant should also be required to conduct research on any tenanted farms that will lose land to see if these businesses will be able to continue. The applicant should be required to install a visitor centre on the site explaining the benefits of all forms of renewable energy for the benefit of the community, visitors to the area and for educational purposes.	proportionate or directly measurable, particularly in the presence of other non-controllable or macro-economic factors which may influence year-on-year income to tourism, leisure and retail businesses. The Applicant will continue to discuss if additional mitigation measures to protect local businesses can be secured through the DCO, or if there is sufficient precedence for such a compensation scheme for business based on other DCOs being granted. Estimates for losses to agricultural employment in ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068] were based on a reasonable worst-case scenario that the nine affected farm businesses covered by the Solar PV and BESS Sites (Lime Down A-E) would each lose 1.5 full-time equivalent workers, while a further 1.5 times multiplier was used to estimate indirect employment impacts to suppliers or downstream processors. The Applicant is confident that this assumption covers where owner-occupier farm businesses are	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			diversifying intentionally and where tenant farm businesses would be required to cease or relocate. A separate report was not published at the discretion of the Applicant at DCO submission to protect farm business owner interests. The Applicant has been in discussions with landowners covering arrangements regarding existing tenancies, excluding any subletting arrangements. Whilst a worst case could involve the termination of an agricultural tenancy or contract in its current form, alternative operational and management opportunities are available connected to the Scheme should consent be granted. These will be secured either by direct voluntary arrangement between the respective parties and the Applicant, or through the measures secured in the Outline SSCEP [REP3-104] by Requirement 18 in Schedule 2 to the Draft DCO [REP3-005]. The Applicant considers engagement between local people, visitors, and the benefits of renewable energy production may be worth exploring with	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			Wiltshire Council, based on where there is local stakeholder enthusiasm to do so. However, the Applicant does not agree that DCO Requirements is an appropriate means to do so, and instead would look to delivery through the Community Benefit Fund (if more widely requested by local stakeholders). For the avoidance of doubt, the Applicant would not be seeking to build a premises or “centre”, but would seek the use of local facilities where required. The Applicant is able to discuss these matters further through dialogue with Wiltshire Council.	
3.12.12	Potential impact of the Scheme on local businesses	Wiltshire Council requests that the Applicant should facilitate feedback from local business groups such as the Federation of Small Business and the Chambers of Commerce on the impact of the scheme on local businesses. The applicant should be required to do an economic impact report on the equine sector which is a significant contributor to the local economy.	The Applicant has committed to engagement with external stakeholders through the Outline SSCEP [REP3-104] , which may include local business groups such as the Federation of Small Business, the Chambers of Commerce, and Swindon and Wiltshire Business and Growth Unit, recognising that this is not an exhaustive list. The Applicant has therefore committed to engagement with Wiltshire ERT and Swindon and Wiltshire Business and	Agreed

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			Growth Unit during the production of the final SSCEP, as required by Requirement 18 in Schedule 2 to the Draft DCO [REP3-005]. The Applicant considers that the ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068] has assessed the economic and recreational impacts of the Scheme on equestrian receptors. The Applicant is committed to ensuring impacts on equestrian facilities can be mitigated wherever practicable, as secured through the measures in the Outline CEMP [REP3-092], Outline OEMP [REP3-094], Outline CTMP [REP3-108], and Outline PRoWPPMP [REP1-104], each secured by requirement in Schedule 2 to the Draft DCO [REP3-005]. In response to the request for further information by Wiltshire Council, and by the Examining Authority within their First Written Questions [PD-010], the Applicant has committed to undertaking a detailed assessment of the economic impacts to equestrian businesses and supporting services operating within	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			the 5 km Study Area. A survey to relevant businesses was issued by post and email on 29th June 2026. Dependent on response rate, the <u>updated assessment has been will be published for either Deadline 4 or at Deadline 5. Furthermore, the Applicant is producing a Technical Note in response to SE2.2 of the</u> <u>ExQ2s which will focus on the businesses highlighted by the ExA and would be submitted into Examination shortly.</u>	
3.12.13	<u>Setup of an Innovation Forum</u>	<u>In order to adhere to good practice and guidance throughout the time of operation, it is suggested that an Innovation Forum is set up, with an opportunity to enable flexibility over the scheme's lifetime and the ability to evolve with new innovations and best practice. It is also suggested that recycling is a topic that an Innovation Forum could cover. [REP2-048]</u> <u>The council are looking for some kind of reassurance of how innovations (if applicable) will flow into the Lime Down</u>	<u>The Applicant recognises the Council's overarching point that, over a 60-year operational period, relevant technologies, industry standards, recycling practices, monitoring systems and operational approaches may evolve. The Applicant has committed to ensuring the Scheme keeps up to date with relevant regulatory controls and industry standards, as secured through the Outline OEMP [REP4-051] and Outline Decommissioning Statement [REP3-096] by Requirements 14 and</u>	<u>Under Discussion</u>

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		<u>Solar Park scheme, especially where new innovations will help to mitigate the identified impacts on the community and the environment, and also to monitor the impacts and whether the mitigation and DCO Requirements are having the desired effect. An Innovation Forum could consist of meetings between the developer / manager of the Scheme and a community and council representative.</u> <u>The Innovation Forum should have a Terms of Reference detailing for example how often it meets, who its members are, what its powers are, what kind of monitoring or reporting is carried out. It is suggested that Wiltshire Council is the main point of contact / liaison. [REP3-142]</u> <u>It is suggested that the Innovation Forum would have a link to the Community Liaison Group, although it would be a separate group.</u> <u>Furthermore, the council is seeking for the OEMP, Decommissioning Strategy and Battery Safety</u>	<u>20 respectively in Schedule 2 to the Draft DCO [REP4-004].</u> <u>That notwithstanding, the Applicant also recognises the potential value in having an appropriate mechanism through which such advancements can be discussed, particularly where they may support improvement.</u> <u>The matters raised by Wiltshire Council are best addressed through ongoing engagement and can continue post consent, rather than a separate, prescriptive DCO mechanism at this stage. Discussions with Wiltshire Council and other relevant stakeholders such as Parish Councils will continue after consent to agree suitable engagement arrangements. [REP4-081].</u>	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		<u>Management Plan to be updated to reflect the Innovation Forum's role in replacement activities and decommissioning.</u>		
<u>3.2.14</u>	<u>Potential impact of the Scheme to Grittleton House</u>	<u>The Council are concerned around potential temporary construction impacts to Grittleton House and any subsequent impacts this may have on the current business present at the property. The council considers that the Applicant should work with Grittleton House's owners to identify additional and more robust and effective management proposals which could assist in mitigating the impact from the scheme on the business and hence on the future viability and conservation of the asset.</u> <u>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.</u>	<u>The Applicant acknowledges the Council's concern and firstly notes that any effects during the construction period will be temporary in nature, and identified that there will be no effect on how the asset is experienced. Furthermore, the Applicant identifies that direct impacts to Grittleton House are managed through measures in the Outline Management Plans but discussion would identify further measures that could be considered when construction is taking place.</u> <u>The Applicant confirms it liaising directly with the owners of Grittleton House regarding construction impacts and any potential mitigation. The Applicant considers that any effects can be mitigated through suitable programming of construction works through the Community Liaison Group (CLG). Relevant businesses (including Grittleton House) would be invited to</u>	<u>Under Discussion</u>

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			<u>join the CLG. The Applicant identifies that impacts could likely be avoided in the first instance through engagement in the Community Liaison Group, giving advance notice, agreeing suitable programming of works, and compensatory options should this not be possible. Works in proximity to businesses would be clearly communicated, and relevant mitigation measures (e.g. deliveries) are controlled via relevant management plans already.</u>	

3.13 Soils and Agriculture

Table 3-13: Soils and Agriculture

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
3.13.1	Legislation and Policy	Wiltshire Council is of the opinion that the relevant policies have been considered.	The Applicant considers that ES Volume 1, Chapter 17: Soils and Agriculture [REP1-025] has identified and appropriately considered all applicable legislation and policy.	Agreed
3.13.2	Methodology	Wiltshire Council has not provided comments on the methodology used for the assessment.	The methodology adopted within ES Volume 1, Chapter 17: Soils and Agriculture [REP1-025] has been derived from the information obtained through consultation with stakeholders and by reviewing relevant guidance and studies. and is considered acceptable.	Agreed
3.13.3	Baseline	Wiltshire Council has not provided comments on the baseline applied in the assessment.	The baseline conditions which are detailed in ES Volume 1, Chapter 17: Soils and Agriculture [REP1-025] are representative of the baseline site conditions. The baseline soil and agricultural land conditions of the cable route corridor were established through targeted survey.	Agreed

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
3.13.4	Assessment - BMV and site selection	Wiltshire Council request evidence that a full and comprehensive assessment of availability of land, at lower level than BMV, has been conducted.	An appraisal of alternative sites is presented in ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056] and ES Volume 3, Appendix 4 1: Site Selection Assessment Report [APP-185]. Furthermore, the Planning Statement [REP3-081] provides justification for the use of BMV agricultural land in terms of policy, land use and other sustainability considerations. This assessment considered alternative sites within a 20 km radius of the existing National Grid Melksham Substation and concludes that there are no more suitable locations, including in relation to BMV, within the defined search area than the proposed Site. The Site Selection Assessment Report [APP-185] explains how brownfield land, industrial land, previously developed land and lower grade agricultural land were considered in accordance with policy. <u>The Planning Statement [REP3-081] goes on to provide more detailed justification for the use of BMV</u>	Agreed

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			agricultural land for the Scheme, in terms of policy, land use and other sustainability considerations.	
3.13.5	Mitigation / Management Plans – pollution control	Wiltshire Council request the Applicant to prepare plans to address pollution incidents for the construction / decommissioning phases and for any contamination during lifetime of project, which are agreed by the council.	Measures to manage and respond to pollution incidents will be set out in the detailed Construction Environmental Management Plan (CEMP) and the detailed Decommissioning Strategy. These documents will be prepared substantially in accordance with the Outline CEMP [REP3-092] and Outline Decommissioning Strategy [REP3-096] . The preparation and implementation of these management plans are secured through Requirements within Schedule 2 of the Draft DCO [REP3-005] .	Agreed
3.13.6	Mitigation / Management Plans – soil remediation	Wiltshire Council are concerned that while the outline Soil Resources Management Plan (7.15) [APP-280] states that the measures outlined will also be relevant to works during the decommissioning phase, subject to relevant good practices at the time, there is no further reference to what these might be. The council would	The Outline Soil Resources Management Plan (SRMP) [REP3-098] was updated at Deadline 3 to include more detail on soil inspections to be undertaken at decommissioning including specifying <u>The updated Outline SRMP specifies</u> that inspection of soil boreholes and pits will be undertaken by a suitably	Agreed

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		recommend a comprehensive soil survey with test holes dug to look for signs of soil compaction following decommissioning of the site, with remedial actions like sub-soiling to address any compaction prior to the return to agricultural use.	qualified soil specialist in order to identify compaction or other defects in the soil that would require remedial action at decommissioning, prior to agricultural operations being resumed. A detailed SRMP will be prepared post consent and will be required to be in substantial accordance with the Outline SRMP [APP-280] and is secured through Requirement 17 in Schedule 2 of the Draft DCO [REP3-005]. As best practice measures may evolve over the lifetime of the Scheme, the SRMP does not prescribe detailed remediation measures at this stage. Further detail on decommissioning activities will be provided within the detailed Decommissioning Strategy.	
3.13.7	Sheep Grazing Reduced output from grassland	<u>Wiltshire Council seeks clarification on whether livestock grazing will be feasible within the solar park, including responsibility for and costs of any fencing, guards, or other protective measures required. The Council also requests information on whether future grazing opportunities could help offset</u>	<u>The Applicant confirms that sheep grazing beneath the solar panels may be possible, but it has not been relied upon as a mitigation measure in the assessment of effects on soils, agriculture, or agricultural output. Therefore, no detailed grazing strategy, grassland productivity assessment, or</u>	Agreed

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		<u>reductions in grassland productivity and asks the Applicant to undertake further assessment of the potential loss of agricultural production from land currently used for livestock grazing.</u> Wiltshire Council request clarity on grazing feasibility and responsibilities for protective measures. Unless it is intended that any protective measures needed for the infrastructure on the site in the event of it being used for grazing should be installed by the business using the land for grazing, then a plan should be provided stating what fencing, guards etc will be installed. If the cost is to be borne by the business, then that should be clearly stated. Wiltshire Council also require clarity in relation to grazing opportunities once the solar park is established which may offset the reduction in output from the current grassland. Wiltshire Council requests that the applicant undertakes further assessment to determine the reduction	<u>grazing-related mitigation has been undertaken. If grazing occurs, no additional protective measures would be required because the solar fields will be enclosed by stock-proof fencing.</u> The Applicant does not intend to undertake further livestock surveys or assessments of agricultural productivity losses related to livestock. Effects on farm holdings, including impacts from the loss of productive farmland, are assessed in ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]. The Applicant can confirm that whilst grazing of livestock (sheep) beneath the solar panels may be possible, this has not been relied upon as a mitigation measure within the assessment of effects on soils and agricultural land. As such, no detailed grazing strategy has been developed. If grazing were to take place during operation, no additional infrastructure or protective measures would be required, as each solar field will be enclosed by stock proof fencing and no additional panel protection would be necessary.	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		in agricultural production from farmland that is currently used for livestock.	As continuation of agricultural use by grazing sheep beneath the solar panels has not been relied upon as a mitigation measure within the assessment of effects on soils, agriculture or agricultural output, no specific assessment of grassland output or grazing related mitigation has been undertaken, and grazing has not been assumed to offset any reduction in grassland productivity. The Applicant is not intending to undertake a survey of livestock or additional assessments on loss of agricultural productivity due to livestock. ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068] includes an assessment of effects on farm holdings in terms of anticipated employment losses which would arise as a result of loss of productive farmable area, including any land used for livestock.	

3.14 Human Health

Table 3-14: Human Health

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
3.14.1	Legislation and Policy	Wiltshire Council considers that relevant planning policy has been adequately considered as part of the application.	The Applicant considers that ES Volume 1, Chapter 18: Human Health [APP-070] and its supporting ES Volume 3, Appendix 18-2: Human Health: Legislation, Policy and Guidance [APP-245] has identified and appropriately considered all applicable legislation and policy.	Agreed
3.14.2	Methodology	Whilst Wiltshire Council is satisfied with the public health assessment methodology, the council recommends a comprehensive Community Liaison Strategy (not just Terms of Reference) is produced and secured through the DCO, which includes KPIs for engagement and wellbeing safeguards. The scheme is expected to have adverse effects on residents' amenity, wellbeing and mental health across construction, operation and decommissioning. While the assessment methodology is accepted, enhanced community engagement and	The methodology adopted within ES Volume 1, Chapter 18: Human Health [APP-070] has been derived from the information obtained through consultation with stakeholders and by reviewing relevant guidance and studies and is considered acceptable. The Applicant considers that the wording of Requirement 4 in Schedule 2 to the Draft DCO [REP1-007], and the wording of the Outline CEMP [EN010168/APP/7.12 (Rev 3)] to identify a Community Liaison Manager and provide a Stakeholder Communications Plan (as secured	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
		wellbeing measures are needed, and future submissions should reference the updated Wiltshire JSNA 2025 and the 2025 English Indices of Deprivation. Meeting with applicant on 03 July 2026. The applicant has been asked to provide details of any ongoing and enhanced community engagement that sits outside the formal DCO and examination process. This is relevant as the impact on communities is ongoing and meaningful engagement will help form the terms of reference for the Community Liaison Group, should permission be granted.	through Requirements 13), together cover the level of detail being requested by Wiltshire Council. It should be noted that Wiltshire Council will be the designated discharging authority for both these requirements, and as such will be able to determine if sufficient detail has been included across these two requirements for them to be approved. The Applicant is happy to commit to drafting the Community Liaison Group Terms of Reference in reference to Suffolk County Council's Energy and Climate Adaptive Infrastructure Policy guidance on Community Engagement and Wellbeing. The production of a Stakeholder Communications Plan, or Communication Strategy would thereafter be the responsibility of the Community Liaison Group to draft following its establishment, and ahead of any construction works on the Scheme commencing. The Applicant notes that Wiltshire Council's JSNA, and the English Indices of Deprivation have been updated since DCO submission, and	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			commits to ensuring these will be referenced in any relevant future submission. The Applicant has continued to keep channels of communication open for informal discussion between members of the public and the Applicant team throughout the DCO examination process. However, as discussed during the meeting of 3 Julyne 2026, the Applicant will look to explore how additional community outreach can be undertaken, and will look to share outline or draft terms of reference with Wiltshire Council's Public Health team in parallel to the DCO examination process.	
3.14.3	Baseline	Wiltshire Council provided no comments on the baseline used for assessment.	The baseline conditions which are detailed in ES Volume 1, Chapter 18: Human Health [APP-070] are representative of the baseline site conditions.	Agreed
3.14.4	Assessment Results	Wiltshire Council provided no comments on the assessment results presented within the ES.	The assessment results set out within ES Volume 1, Chapter 18: Human Health [APP-070] , including likely	Agreed

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			significant effects anticipated, are acceptable.	
3.14.5	Mitigation / Management Plans	Wiltshire Council notes that while the draft DCO requires a Community Liaison Group, it considers this insufficient on its own and recommends a detailed, LPA-approved Community Liaison Strategy setting out practical engagement measures, KPIs for community wellbeing, and implementation arrangements. Greater clarity is also needed on the role of the community liaison manager and how engagement measures in the CEMP and Stakeholder Communications Plan will operate effectively across the wide area and multiple communities affected by the project. See comment under 3.14.2 above.	The proposed mitigation measures set out within ES Volume 1, Chapter 18: Human Health [APP-070], are considered acceptable, and secured within: • Section 3.13 of the Outline CEMP [EN010168/APP/7.12 (Rev 3)]; • Section 3.13 of the Outline OEMP [EN010168/APP/7.13 (Rev 3)]; • Section 3.13 of the Outline Decommissioning Strategy [REP1-100]; • The Outline PRowPPMP [REP1-104]; • The Outline LEMP [APP-283]; • The Outline SSCEP [REP1-108]; • The Outline SCMP [REP1-110]; and • The Outline CMTP [REP1-112].	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			These measures are secured by Requirements 13, 14, 20, 16, 7, 18, and 15 respectively in Schedule 2 to the Draft DCO [REP1-007]. The Applicant has committed to engagement with communities ahead of construction through the implementation of a Community Liaison Group, as secured through Requirement 4 in Schedule 2 to the Draft DCO [REP1-007]. Whilst this group is set up for the construction phase of the Scheme, the Applicant has committed to providing a designated community contact within the Scheme's operation and maintenance team during the operational lifetime of the Scheme, with a dedicated Community Liaison Manager committed to during peak replacement events and decommissioning. This is secured through the Outline OEMP [EN010168/APP/7.13 (Rev 3)] and Outline Decommissioning Strategy [REP1-100] by Requirements 14 and	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			20 in Schedule 2 to the Draft DCO [REP1-007]. The Applicant is required to submit a detailed CEMP substantially in accordance with the Outline CEMP [EN010168/APP/7.12 (Rev 3)] as part of the discharge of Requirement 13 in Schedule 2 to the Draft DCO [REP1-007]. The Applicant will at that point provide Wiltshire Council with details of the implementation of role of Community Liaison Manager, and of a Stakeholder Communication Plan, which is to be then approved by Wiltshire Council as the designated discharging authority. Display boards would be installed near to the entrances to construction compounds. Contact details for Site Manager(s), the Community Liaison Manager, and any other relevant contact point for information, nuisance or complaints, will also be distributed to Wiltshire Council, local parish councils and to Affected Persons. The Applicant furthermore confirms that requests by Wiltshire Council	

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			[REP2-046 and REP2-048] to more explicitly reference the Community Liaison Group in the Outline CEMP [EN010168/APP/7.12 (Rev 3)] and Outline Decommissioning Strategy [EN010168/APP/7.14 (Rev 3)] have been undertaken, and published at Deadline 3. This also includes clarification on the commitment to re-establish the Community Liaison Group in advance of decommissioning works commencing.	

3.15 Other Environmental Matters

Table 3-15: Other Environmental Matters

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
3.15.1	Glint and Glare mitigation	In order to consider the sufficiency of the proposed glint and glare mitigation, Wiltshire Council require clarity on the following points: How the Applicant has calculated that the height of natural vegetation will reach 3.2m and what assumptions is this figure based on. How the impact of natural vegetation being 3.2m in height affects the significance thresholds as set out in the flow chart on page 114 of Appendix 20-4 Solar Photovoltaic Glint and Glare Study [APP-261].	The Applicant confirms that assumptions utilised for vegetation reaching a height of 3.2m are based on the current height of vegetation (2m in 2025) and annual growth of 0.4m per year, from now until the operational phase (2028). 3 years of growth of 0.4m per year results in 1.2m of growth to the current height of vegetation (2m in 2025) resulting in vegetation reaching 3.2m in height. This methodology is set out within the future baseline section, specifically paragraph 20.5.31) of ES Volume 1, Chapter 20: Other Environmental Matters [APP-072]. Vegetation will then be maintained at a height sufficient to screen views from the primary living space of dwelling receptor 24 throughout the operational phase. Once the vegetation reaches 3.2m in height, solar reflections would no longer be both geometrically possible	Agreed

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			and visible and therefore no significant impact would be predicted.	
3.15.2	BESS fire suppression	The council is confused by the apparent insertion of the word “optional” placed in brackets after Fire Suppression System as it is listed in paragraph 1.2.1 to Appendix 3-1 to the submitted Environmental Statement [APP-182]. The DCO should contain a Requirement to ensure that fire suppression systems are installed and operational in battery storage facilities.	The Outline BSMP [REP1-110] stipulates that the final BESS design and site layout will have been validated through mandatory Large Scale Fire Testing (LSFT) and rigorous consequence modelling to minimise the requirement for any FRS intervention in a thermal runaway incident. LSFT must establish minimum equipment spacing distances that demonstrate there is no fire propagation to adjacent BESS enclosures or Energy Storage System (ESS) equipment. The Outline BSMP [REP1-110] sets out the mitigation measures which will be secured through Requirement 6 (‘Battery Safety Management’) of the Draft DCO [REP1-007]. As a minimum, a BESS Combustible Concentration Reduction (CCR) system will comply with NFPA 855 (2026) NFPA 69 (Ref 1) guidelines which require activation at no more than 10% of the Lower Explosive Limit (LEL) of the explosive gas(es). The	Under Discussion

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			CCR must ensure the prevention of a dangerous build-up of explosive gases (on average 25% LEL within the BESS). An optional BESS water based fixed suppression system (automatic or dry pipe) or Thermal Runaway Propagation Prevention system (engineered to directly access cells within battery modules) may also be utilised following the results of the LSFT test.	
3.15.3	Minerals	Wiltshire Council considers that mineral resources have been adequately considered as part of the application.	The Applicant considers that the assessment of the likely effects on Mineral Resources presented in Section 20.2 in ES Volume 1, Chapter 20: Other Environmental Matters [APP-072] , including likely significant effects anticipated, are acceptable	Agreed
3.15.4	Waste	Wiltshire Council considers that waste has been adequately considered as part of the application.	The Applicant considers that the assessment of the likely effects on Materials and Waste presented in Section 20.3 in ES Volume 1, Chapter 20: Other Environmental Matters [APP-072] , and supporting document ES Volume 3, Appendix 20-3 Materials and Wast Methodology	Agreed

Reference	Sub-topic	Wiltshire Council Position	Applicants Position	Status
			and Baseline [APP-260] , including likely significant effects anticipated, are acceptable.	