

Deadline 6 Submission

Vivienne Jane Clarke

Response to the Applicant's Deadline 5 Response to Submissions Received at Deadline 4 [REP5-098]

For the reasons set out in detail below arising from the Applicant's failure properly to respond to points made in my Deadline 4 submission

Please will the ExA review carefully and question the Applicant on the following:

1. The commitments to be made and secured in relation to the planting and subsequent maintenance of hedgerows, trees and shrubs which form such a key part of the Applicant's attempt to hide the panels they plan to instal.
2. Whether the commitments are adequate to ensure the best prospects of survival of new planting.
3. The source of water and method and frequency of its delivery for the maintenance of the new mitigation planting identified in the oLEMP. [REP3-100].
4. If the planting does not survive how the assumptions about screening and reduction in harm up to and including Year 15 can be relied on as showing the worst case.
5. How water is to be transported to site, and where in the traffic and construction documents the number of required vehicles appear.
6. Whether the Applicant has notified Wessex Water (which has just imposed a hosepipe ban) and Bristol Water of the need for substantial amounts of water for watering new plants since watering new plants does not appear in the Outline Water Resources Strategy [APP290].
7. The duration and extent of the obligations to maintain new plants beyond the first year and in particular the ongoing obligations to replant any which have failed.
8. The percentage of new plants the Applicant has assumed will die in the first year post planting.

At page 400 onwards of REP5-098 the Applicant purports to respond to points I made in my Deadline 4 submission in which I referred to my comments on documents submitted at Deadline 2 [REP3-175]. Once again, I expressed my concerns about the

survival of the mitigation planting proposed in the absence of a watering regime which once again has not been properly addressed by the Applicant.

In its response the Applicant has merely referred me to Outline LEMP [REP3-100] and the Outline Water Resources Strategy [APP290] but to no specific part of those documents.

I have reviewed those documents and they do not satisfy my concerns about the likelihood that the huge number of new hedging plants, shrubs and saplings, which the Applicant will have to plant to comply with the commitments it is making to mitigate the harm which would be caused by the Scheme, will survive.

Many of the assurances of the reduction in harm at Year 15 (which I do not accept) are heavily or wholly dependent on the survival and growth to the anticipated height of the hedges and trees to be planted.

The Outline LEMP [REP3-100] refers in the most general of terms to watering of new plants in Hedgerow Management at 1.3.30 and 1.3.45 and to Woodland and Shelterbelt at 1.3.55 and to Scattered Trees and Native Shrub Management at 1.3.65. For ease these paragraphs are copied below – they all refer to regular watering in their first summer.

Hedgerow Management

1.3.30 Newly planted hedgerows shall be regularly watered in their first summer and weeds shall be controlled through the use of bark mulch. A 75 mm layer of bark mulch 0.5 m either side of the hedge will be spread along the length of the hedge immediately after planting to suppress weeds and retain soil moisture.

Hedgerow Management

1.3.45 All trees and shrubs will be regularly watered in the first summer and thereafter as required to ensure successful establishment. Bark mulch is to be maintained at a depth of 75 mm and form a diameter of at least 0.5 m around each tree or shrub as required to suppress weeds and retain soil moisture.

Woodland and Shelterbelt Management

1.3.55 All trees and shrubs will be regularly watered in the first summer and as required thereafter to ensure successful establishment. Bark mulch will be maintained at a depth of 75 mm, and 0.5 m in diameter around each tree or shrub as required to suppress weeds and retain soil moisture.

Scattered Trees with Native Shrub Management

1.3.65 All trees and shrubs will be regularly watered in the first summer and as required thereafter to ensure successful establishment. Bark mulch will be maintained at a depth of 75 mm, 0.5 m in diameter around each tree or shrub as required to suppress weeds and retain soil moisture.

Despite the repeated reference to regular watering in the first summer and “as required thereafter to ensure successful establishment”, nowhere have I been able to find details of how often this watering is expected to take place, nor how much water is to be used nor the source of that water, nor how it is to be taken to locations, some of which may be far from roads. This is not an area where there are mains taps so presumably all water would have to come in tankers. **This information should be provided.**

The Outline Water Resources Strategy document [APP290] refers to washing panels and lorries, amenity water for construction and directional drilling and dust suppression. I cannot trace any reference of watering plants. That would need a considerable amount of water which, presumably would need to be delivered in lorries. Similarly, I cannot trace any reference to water lorries in the traffic sections or journeys or other traffic impact caused by water deliveries. The Applicant needs to identify where in its documents it has accounted for water deliveries needed to comply with watering obligations. **If not included this information needs to be provided to ensure a worst case is being assessed.**

It is not clear whether the Applicant has referred to the obligation to water new plants in its materials shared with Wessex and Bristol Water based on the Statement of Commonality. If the Outline Water Resources Strategy document does not refer to watering how would the water companies know of this requirement? **This needs to be clarified.**

It is not clear to me for how long the Applicant intends (and will be obligated under the DCO) to maintain its mitigation planting. **This needs to be specified clearly and included in the obligations in the DCO.**

Although there appears to be some acknowledgement that some plants will not survive and will need to be replaced, I am not aware of any figures for the percentage of loss in the first and subsequent years predicted by the Applicant. **This information needs to be provided.**

The Applicant relies very heavily on the new planting to support its planned mitigation and, if the plants do not survive, this mitigation will be ineffective and the substantial harm the Applicant has admitted will occur, as a result of the Scheme, will continue for many years.

To illustrate the likely problems with the survival of new planting, at Fig 1 is a photograph of a number of trees which were planted near Malmesbury (SN16 0JB) in November

2024. The owner of the land planted 800 native English trees. Despite regular watering using a water bowser, well over half have already died this year or last year.



Figure 1 trees planted in November 2024 the majority of which have already died

Below are photographs I took on 15 August 2026 of new hedging planted beside footpath MALW51 in 2025. Every single plant appears to have died.









Although I am not an expert, there seem to be inconsistencies between the various outline management plans with the oLEMP referring to watering, and traffic plans not accounting for the necessary water. The Water Resources Strategy does not refer to watering of plants at all and the traffic materials may not include the necessary figures for water transporters.

I have not used AI to produce this document but did search “How Much Water Does a New Hedge Need.

Hope Grove Nurseries recommend

“new bare root plants should have 5-10 litres of water once or twice a week (depending on the weather) for each metre of hedge. Root ball hedging plants will often need much more. If weather turns very hot then twice weekly watering would be a good idea until the heat subsides.”

Hedge Nursery say

Watering a new hedge

The first is watering and we cannot stress this enough. If you possibly can, you should water thoroughly and frequently from early Spring, when the plants need a huge amount of energy to put on the spring growth of their roots, leaves and flowers, and throughout at least the first summer. Normal summer rainfall is not enough to establish new plants. After that the plants will be reasonably well established and you will only need to water if there is a prolonged dry spell. Please water a wide area around each plant - arid soil is not conducive to root growth. After flooding the area around the plant, then apply water slowly so that the soil absorbs a large quantity of water. If there is a dry spell in autumn/winter, you should water again. Watering can be reduced in the 2nd year but is still important in dry spells.

In the light of the weather this summer and last, and the expectation that dry summers will continue, it seems clear that a huge amount of water and watering would be required to stand any chance of the saplings and hedges proposed to be planted by the Applicant surviving and has not been properly provided for in the various control documents.

My other point relates to VJC004 on page 402 of REP5-098. Once again, the Applicant has failed to respond to the concern I have raised repeatedly about misleading images in their materials.

They answer a question I did not raise. The question is not whether flexibility is needed, but why the panels shown in their materials are not of the type for which consent is

sought. And, why they still use grazing sheep (something which many members of the public think is a significant benefit) when this is not a component of the Scheme.

As with the misleading image of the BESS in the materials used during consultation, about which I have complained and had no proper response, I do not accept that the Applicant has been transparent and clear in its consultation materials and its current website.

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