



Lime Down

Solar Park

The Applicant's Response to Submissions Received at Deadline 5

August 2026

Revision 1

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The Infrastructure Planning (Examination Procedure) Rules 2010



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1 Introduction

1.1 Purpose of the Document

- 1.1.1 This document provides Lime Down Solar Park Limited (the Applicant's) response to submissions made at Deadline 5 (7 August 2026) by Interested Parties.
- 1.1.2 A total of 30 documents were submitted by Interested Parties at Deadline 5 and published on the Planning Inspectorate (PINS) website on 11 August 2026. The Examining Authority (ExA) subsequently exercised its discretion to accept two further submissions, which were published on 12 August 2026.
- 1.1.3 It is noted that Deadline 5 submissions primarily consist of responses to the ExA's Second Written Questions (ExQ2) and comments on submissions received at Deadline 4.

1.2 Structure of document

- 1.2.1 This document provides a response from the Applicant to the matters raised in the submissions and is structured as follows:
- **Table 1-1** sets out the list of acronyms used for management documents that form part of the Applicant's submission and may have been referred to by the Applicant in responding.
 - **Table 1-2** lists the local authorities that have submitted comments. These submissions are presented and responded to in **Section 2** of this document.
 - **Table 1-3** lists the statutory consultees, undertakers and notable parties that have submitted comments and with whom the Applicant is seeking to undertake a Statement of Common Ground. These submissions are presented and responded to in **Section 3** of this document.
 - **Table 1-4** lists the host and neighbouring parish councils that have submitted comments. These submissions are presented and responded to in **Section 4** of this document.
 - **Table 1-5** lists the parties that have submitted comments and are also listed within the **Book of Reference [REP5-018]**. These submissions are presented and responded to in full in **Section 5** of this document.
 - **Table 1-6** lists the members of the public and all remaining organisations and businesses that have submitted comments. These submissions are presented and responded to in **Section 6** of this document.
- 1.2.2 References to the Application documentation are provided in accordance with the referencing system set out in the Planning Inspectorate's Lime Down Solar Park [Examination Library](#).

Table 1-1 List of Acronyms

Acronym	Document
BESS	Battery Energy Storage System
BNG	Biodiversity Net Gain
BSMP	Battery Safety Management Plan
CEMP	Construction Environmental Management Plan
CNL	Cotswolds National Landscape
CR	Consultation Report
CTMP	Construction Traffic Management Plan
DCO	Development Consent Order
DS	Decommissioning Strategy
EIA	Environmental Impact Assessment
EPMP	Ecological Protection and Mitigation Plan
EPMS	Ecological Protection and Mitigation Strategy
EqIA	Equality Impact Assessment
ES	Environmental Statement
FRADS	Flood Risk Assessment and Drainage Strategy
FTE	Full Time Equivalent
GVA	Gross Value Added
LEMP	Landscape and Ecological Management Plan
OEMP	Operational Environmental Management Plan
PEIR	Preliminary Environmental Information Report
PROWPPMP	Public Rights of Way and Permissive Paths Management Plan
SRMP	Soil Resources Management Plan
SSCEP	Skills, Supply Chain and Employment Plan
SWMP	Site Waste Management Plan
WRS	Water Resources Strategy

1.3 Table of Parties Submitting Comments

Table 1-2 List of Parties Whose Submissions Are Responded to in Section 2

Examination Library Reference	Acronym	Book of Reference Plot Number	Representation Received From
REP5-112 REP5-113	WC	01-003, 01-004, 01-005, 01-006, 01-007, 01-008, 01-009, 01-010, 01-011, 01-012, 01-013, 01-014, 01-015, 01-016, 01-017, 01-018, 01-019, 01-020, 01-021, 01-022, 01-023, 01-024, 01-025, 01-026, 01-030, 01-031, 01-032, 01-033, 01-034, 01-035, 01-036, 01-037, 01-038, 01-039, 01-041, 01-042, 01-043, 01-044, 01-045, 01-046, 01-047, 01-051, 01-052, 01-053, 01-057, 02-001, 02-002, 02-003, 02-004, 02-005, 02-006, 02-007, 02-008, 02-009, 02-010, 02-011, 02-012, 02-013, 02-014, 02-015, 02-016, 02-017, 02-018, 02-019, 02-020, 02-021, 02-022, 02-023, 03-001, 03-002, 03-003, 03-004, 03-005, 03-006, 03-007, 03-008, 03-009, 03-010, 03-011, 03-014,	Wiltshire Council

Examination Library Reference	Acronym	Book of Reference Plot Number	Representation Received From
		03-015, 03-016, 03-017, 03-018, 03-019, 03-020, 03-021, 03-022, 03-023, 03-024, 03-025, 03-026, 03-027, 03-028, 03-029, 03-030, 03-031, 03-032, 03-033, 03-034, 03-035, 03-036, 03-037, 03-038, 03-039, 03-040, 03-041, 03-042, 03-043, 03-044, 03-048, 03-049, 03-052, 03-053, 03-054, 03-055, 03-056, 03-057, 03-058, 03-059, 03-060, 03-061, 03-062, 03-063, 03-064, 03-065, 03-078, 04-001, 04-002, 04-003, 04-004, 04-005, 04-006, 04-007, 04-008, 04-009, 04-010, 04-011, 04-012, 04-013, 04-014, 04-015, 04-016, 04-020, 04-021, 04-022, 04-023, 04-024, 04-025, 04-027, 04-028, 04-029, 04-030, 04-031, 04-032, 04-036, 04-037, 04-047, 04-055, 04-056, 04-057, 04-058, 04-059, 04-060, 04-061, 04-065, 04-066, 05-001,	

Examination Library Reference	Acronym	Book of Reference Plot Number	Representation Received From
		05-002, 05-003, 05-004, 05-005, 05-006, 05-007, 05-008, 05-009, 05-010, 05-011, 05-012, 05-013, 05-014, 05-015, 05-016, 05-017, 05-018, 05-019, 05-020, 05-021, 05-022, 05-023, 05-024, 05-025, 05-026, 05-027, 05-028, 05-029, 05-030, 05-031, 05-032, 05-033, 05-034, 05-035, 05-036, 05-037, 05-038, 05-039, 05-040, 05-041, 05-043, 06-001, 06-002, 06-003, 06-004, 06-005, 06-006, 06-007, 06-008, 06-010, 06-011, 06-012, 06-013, 06-014, 06-015, 06-016, 06-017, 06-018, 06-019, 06-021, 06-024, 06-027, 06-030, 06-032, 06-035, 06-036, 06-037, 06-038, 06-039, 07-001, 07-002, 07-003, 07-004, 07-005, 07-006, 07-007, 07-008, 07-009, 07-010, 07-017, 07-018, 07-019, 07-020, 07-021, 07-022, 07-023, 07-024, 07-025,	

Examination Library Reference	Acronym	Book of Reference Plot Number	Representation Received From
		07-026, 07-027, 07-028, 07-032, 07-033, 07-034, 07-035, 07-041, 07-042, 07-043, 07-044, 07-045, 08-001, 08-002, 08-003, 08-004, 08-005, 09-001, 09-002, 09-004, 09-005, 09-006, 09-007, 09-008, 09-009, 09-010, 09-011, 09-012, 09-013, 09-014, 09-017, 09-022, 10-001, 10-002, 10-003, 10-004, 10-005, 10-006, 10-008, 10-009, 10-010, 10-011, 10-012, 10-013, 11-006, 11-007, 11-008, 11-010, 11-011, 11-012, 11-013, 11-014, 11-015, 11-016, 11-017, 11-018, 11-019, 11-020, 11-021, 12-001, 12-002, 12-003, 12-004, 12-005, 12-006, 12-007, 12-008, 12-009, 12-010, 12-015, 12-016, 12-017, 13-004, 13-005, 13-006, 13-007, 13-008, 13-009, 13-010, 13-011, 13-012, 13-013, 13-014, 13-015, 13-016, 13-019, 13-024, 13-026,	

Examination Library Reference	Acronym	Book of Reference Plot Number	Representation Received From
		13-027, 13-028, 13-029, 13-030, 13-031, 13-032, 13-033, 13-034, 13-035, 13-036, 13-037, 14-001, 14-002, 14-003, 14-004, 14-005, 14-005a, 14-006, 14-006a, 14-008, 14-009, 14-010, 14-011, 14-013, 14-016, 14-017, 14-019, 14-020, 14-021, 14-022, 14-023, 14-024, 14-025, 14-026, 14-027, 14-028, 14-028a, 14-030, 14-031, 14-032, 14-033, 14-034, 14-037, 14-039, 14-041, 14-048, 14-049, 14-050, 15-001, 15-002, 15-003, 15-004, 15-005, 15-006, 15-007, 15-008, 15-009, 15-010, 15-011, 15-012, 15-013, 15-014, 15-015, 15-016, 15-017, 15-018, 15-019, 15-020, 15-021, 16-001, 16-002, 16-002a, 16-004, 16-005, 16-007, 16-008, 16-009, 16-011, 16-012, 16-014, 16-014a, 16-014b, 16-014c, 16-015, 16-016, 16-017, 16-018, 16-019,	

Examination Library Reference	Acronym	Book of Reference Plot Number	Representation Received From
		16-020, 17-001, 17-002, 17-003, 17-004, 17-005, 18-001, 19-001, 19-002, 22-001, 22-002, 23-001, 23-002, 23-003	

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

Examination Library Reference	Acronym	Book of Reference Plot Number	Representation Received From
REP5-123 REP5-124	EA	N/A	Environment Agency
REP5-128	CNLB	N/A	Cotswolds National Landscape Board
REP5-125	HE	N/A	Historic England
REP5-140	NE	N/A	Natural England
REP5-127	NH	09-018, 09-019, 09-020, 09-021, 13-003, 13-005, 13-006, 13-008, 13-009, 13-012, 13-013, 13-014, 13-016, 20-001, 20-002, 20-003, 21-001, 21-002, 21-003, 21-004, 21-005, 21-006, 21-007	National Highways
REP5-126	NGET	11-011, 11-014, 11-015, 11-017, 11-019, 11-020, 12-001, 12-002, 12-003, 12-004, 12-005, 12-006, 12-007, 12-008, 12-009, 12-010,	National Grid Electricity Transmission PLC (NGET)

Examination Library Reference	Acronym	Book of Reference Plot Number	Representation Received From
		12-015, 12-016, 12-017, 12-018, 12-019, 12-020, 13-001, 13-002, 13-012, 13-015, 13-016, 13-018, 13-019, 13-024, 13-028, 13-032, 13-034, 13-036, 13-037, 14-001, 14-002, 14-003, 14-004, 14-005, 14-005a, 14-006a, 14-007, 14-007a, 14-009, 14-012, 14-015, 14-015a, 14-019, 14-020, 14-021, 14-022, 14-023, 15-007, 15-008, 15-009, 15-011, 15-012, 15-013, 15-014, 15-018, 15-021, 16-001, 16-002, 16-002a, 16-003, 16-004, 16-005, 16-006, 16-009, 16-011, 16-012, 16-014, 16-014a, 16-014b, 16-014c, 16-015, 16-016, 16-017, 16-018, 16-019, 16-020	
REP5-121	AFR	N/A	Avon Fire and Rescue
REP5-122	DWFR	N/A	Dorset and Wiltshire Fire and Rescue
REP5-130	SLD	N/A	Stop Lime Down

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

Examination Library Reference	Acronym	Book of Reference Plot Number	Representation Received From
REP5-114	CWPC	N/A	Chippenham Without Parish Council
REP5-115	GPC	N/A	Grittleton Parish Council
REP5-116	HPC	N/A	Hullavington Parish Council
REP5-116 REP5-117	LAPC	N/A	Luckington and Alderton Parish Council
REP5-119 AS-023	SPC	N/A	Sherston Parish Council
REP5-120	YKPC	N/A	Yatton Keynell Parish Council

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

Examination Library Reference	Acronym	Book of Reference Plot Number	Representation Received From
REP5-138	KMTE	05-043, 06-001, 06-002, 06-003, 06-004, 06-005, 06-006	KMT Farming and Consultancy on behalf of Mr John Eavis and Mrs Rosemarie Eavis
REP5-133	PP	N/A	Dr Peter Phillips
REP5-131	BMG	N/A	Bridget Marie Gregory
REP5-136	JSW	Party not referenced in the Land and Rights Negotiations Tracker.	Jonathan Seymour-Williams
REP5-141	AMC	12-001, 12-002, 12-003, 12-004, 12-005, 12-006, 12-007, 12-008,	Angus Methuen-Campbell (The Corsham Estate)

Examination Library Reference	Acronym	Book of Reference Plot Number	Representation Received From
		12-009, 12-010, 12-011, 12-012, 12-013, 12-014, 12-015, 12-016, 12-017, 12-018, 12-019, 12-020, 13-001, 13-002, 13-005, 13-008, 13-012, 13-017, 13-018, 13-018a, 13-019, 13-020, 13-021, 13-022, 13-023, 13-024, 13-025, 13-028, 13-032, 13-034, 13-037, 14-001, 14-002, 14-003, 14-004, 14-005, 14-005a, 14-006a, 14-007, 14-007a, 14-010, 14-011, 14-013, 14-016, 14-017, 14-018, 14-019, 14-020, 14-021, 14-022, 14-023, 14-024, 14-025, 14-026, 14-027, 14-028, 14-028a, 14-031, 14-032, 14-034, 14-035, 14-036, 14-037, 14-038, 14-039, 14-041, 14-042, 14-043, 14-044, 14-044a, 14-045, 14-045a, 14-046, 14-047, 14-048	

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

Examination Library Reference	Acronym	Representation Received From
<u>REP5-139</u>	OJF	Oliver John Francis
<u>REP5-134</u>	GP	Geoffrey Philipps
<u>REP5-132</u>	JA	Cllr Jon Atkey
<u>REP5-129</u>	GVH	Grittleton, Sevington and Leigh Delamere Village Hall and Recreation Ground
<u>REP5-137</u>	JMB	Joan Marie Bassler
<u>REP5-135</u>	JF	January Farrington
<u>AS-024</u>	HH	Helen Hood

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

2.1 Wiltshire Council

Table 2-1 Wiltshire Council: Response to the ExA's Second Written Questions

2.1.1 Wiltshire Council's responses to the ExA's Second Written Questions are shown in blue text. The Applicant's responses in this document address those comments.

ExQ2	Question to:	Question:	Applicant's Response
Cultural Heritage (CH)			
Archaeology			
CH2.2	Wiltshire Council	Concrete Feet The ExA note that in Wiltshire Council's relevant representation [RR- 4934] it states that Wiltshire Council Archaeology Service (WCAS) is not supportive of the use of concrete feet as it is considered that is too much risk for impacts upon sub surface archaeology from construction directly over it without mitigation. It also states that WCAS would wish to see panels located away from features in these circumstances so that any impact can be avoided.	The Applicant notes the features listed by WCAS as being suitable for low impact piling. The Applicant considers concrete feet or an alternative low impact or non-intrusive construction methodology to be suitable mitigation options for archaeological assets. As stated in paragraph 2.10.101 of NPS EN-3 below ground impacts of solar on is generally limited. Section 4 of recently published Archaeology and Solar Farms Good Practice Guide (https://www.archaeologists.net/sites/default/files/2026-04/Archaeology-and-Solar-Farms-GPG---FINAL-2026-04-14.pdf), which was prepared by the Association of Local Government Archaeological Officer, Chartered

ExQ2	Question to:	Question:	Applicant's Response
		Is Wiltshire Council able to specify any locations where concrete feet would not be appropriate and where it considers solar PV panels should be removed from the proposed development to prevent unacceptable impacts on sub surface archaeology? Impacts upon high concentrations of archaeological activity, such as enclosed settlements, identified during the trial trenching stage can be mitigated via archaeological excavation. In areas of dispersed activity, such as isolated linear and discrete features, impacts on these individual features can be mitigated by the careful placing of solar panels away from them. The isolated features are listed in the evaluation reports as: A1-01, A1-02, A1-03, A2-01, A3-01, A6-01, A6-02, A7-01, A9-01, A9-02, A10-01, A10-02, B6-01, B9-02, B9-03, B12-01, C1-01, C5-01, C11-01, C11-02, C11-03, C14-01, C30-01, C36-01, C36-02, D20-01, C14-01, E14-01, E20 -01, D1-01, D1-02, D3-01, D6-01, D6-	Institute for Archaeologist, Fame, Historic England and Solar Energy UK, details the impacts of solar arrays on buried archaeological remains (typically less than 1% of the land parcel) and states: <i>"Archaeologically, the impact of one metal support is limited and unlikely to harm the archaeological interest of most archaeological features either singularly or cumulatively (i.e., make it hard for the future investigation of the site to take place once the solar array is removed)."</i> Section 2.9 of guide states the mitigation options should balance archaeological sensitivity with relative impact: <i>"Depending upon the relative significance of the archaeological remains, it may be acceptable to install panel arrays directly over an archaeological site where the impact from panel supports will not affect the ability to understand the site in the future"</i>. Paragraph 2.6.3 reiterates this stating <i>"inserting panel supports along sections of large ditches may cause only minimal disturbance"</i>. As stated in Paragraph 12.9.9 of ES Volume 1, Chapter 12: Cultural Heritage [REP3-017] concrete feet are acknowledged by Historic England as a suitable mitigation option in its Advice Note concerning renewable energy and the historic environment, which also refers to planning guidance published by Building

ExQ2	Question to:	Question:	Applicant's Response
		02, D8-01, D11-01, D11-02, D11-03, D21-01, E1-01, E14-01, E14-02, E20-02 and E21-01.	Research Establishment (BRE) and supported by Cornwall Council. As such the Applicant considers it appropriate to consider a range of low impact or non-intrusive construction methodologies to mitigate archaeological remains. For features identified within Lime Down where such mitigation is proposed, solar mounts are unlikely to harm the archaeological interest of buried features. The Applicant is continuing to discuss approaches to archaeological mitigation with WCAS.
CH2.4	The Applicant	Scheduled Monument - Pillow Mound In Appendix C to its written representation (WR) [REP1-171], Stop Lime Down state that a reasonable worst case for the scheduled monument 'Pillow mound 280m southwest of Surrendell Farm' would be that Horizontal Directional Drilling (HDD) is not viable in this location and a program of strip, map and sample (SMS) is undertaken. Stop Lime Down state that in this case, the residual effect of SMS would be moderate adverse (significant).	The Applicant directs Wiltshire Council to its response given to CH2.4 in the Applicant's Response to the Examining Authority's Second Written Questions [REP5-097]. The Applicant agrees with WCAS that the cable route corridor avoids the pillow mound. HDD is proposed within the cable corridor route to the west of 'Pillow mound 280m southwest of Surrendell Farm' (NHLE: 1018610). As such there are no direct impacts as a result of the Scheme to the Scheduled Monument. Geophysical survey within the cable corridor has not identified any buried archaeological features. HDD is

ExQ2	Question to:	Question:	Applicant's Response
		1) Although the ExA note that the applicant has confirmed that HDD is currently proposed in this location [REP3-129], should a reasonable worst case for the assessment of effect on this asset be that HDD is not possible and that a program of SMS would be undertaken? 2) What would be the residual effect on this asset if SMS is employed in this location? Whilst it is acknowledged that this question was posed to the Applicant, Wiltshire Council considers that the cable route will avoid the Pillow Mound and will not impact it directly. SMS excavation is proposed along the cable route to the west of the Pillow Mound to record possible archaeological features identified during the geophysical survey of the cable route. Any features exposed by the SMS excavation will be investigated, recorded and preserved 'by record', the residual effect of this would be neutral.	being undertaken in this location as a precautionary mitigation measure. The SMS referenced by WCAS is proposed in field to the north-west of the pillow mound where geophysical survey has identified a potential for archaeological remains to be present.

ExQ2	Question to:	Question:	Applicant's Response
CH2.6	The Applicant Wiltshire Council Historic England	Evaluation Trial Trenching Reports and the Outline Archaeological Mitigation Strategy (oAMS) The ExA note from the statement of common ground (SoCG) between the applicant and both Wiltshire Council [REP4-061] and Historic England [REP4-065] that full evaluation trial trenching reports have been shared with these parties. The Applicant: 1) The applicant is asked to submit the full evaluation trial trenching reports into the examination. The Applicant, Wiltshire Council and Historic England: 2) The parties are each asked to provide an update of any discussions that have been undertaken in relation to the evaluation trial trenching reports and any resultant changes that would need to be made to the oAMS or Requirement 12 of the dDCO. Wiltshire Council anticipate that the Applicant will submit the evaluation reports into the	The Applicant directs Wiltshire Council to its response given to CH2.6 in the Applicant's Response to the Examining Authority's Second Written Questions [REP5-097]. The Applicant welcomes this response and acknowledgement that WCAS have accepted the reports without comment. The Applicant has submitted the reports at Deadline 6 [EN010168/EXAM/9.72].

ExQ2	Question to:	Question:	Applicant's Response
		examination once all comments from Historic England and Wiltshire Council have been incorporated into the text. In terms of an update of discussions, Wiltshire Council received the evaluation trial trench reports on 28th May 2026. Wiltshire Council Archaeology Service (WCAS) accepted these reports without comment on 17th June 2026. WCAS have no overriding concerns with these reports. Discussions are currently on-going between WCAS and the Applicant regarding proposed mitigation works as mentioned in the Statement of Comment Ground.	
Built Heritage			
CH2.9a	Wiltshire Council	Rodbourn Conservation Area The SoCG between the applicant and Wiltshire Council [REP4-061] records Wiltshire Councils position that: Amendments to the Outline CEMP [REP3-092] and Outline CTMP [REP1-112] intended to mitigate the impact on the Rodbourne Conservation Area via the involvement of the Conservation Officer in	The Outline CTMP [EN010168/APP/7.22] (Revision 5) has been updated with paragraph 2.1.11: "In relation to the existing highway between Rodbourne Road and the fork in the road approximately 270m to the west, this section will be used to route to accesses 11-17, shown in ES Volume 2, Figure 13-11 [REP5-037], during the operational phase only. Vehicle movements will be associated with occasional maintenance as well as replacement of panels and equipment when required. Existing agricultural use will be maintained.

ExQ2	Question to:	Question:	Applicant's Response
		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. Wiltshire Council is asked if it can set out what further design information it would need to be provided with to enable the council to confirm whether or not there could be a potential design solution to mitigate the impact on the Conservation Area? Wiltshire Council was concerned that the scope and detail of the Highway Improvement Works required in this location was largely unknown and hence the level of impact and potential for mitigation were impossible to assess. The Applicant has now confirmed that the nature and usage of the access determine that proposals for upgrading are limited to minor surface works to the track with no junction improvement or widening planned. It is understood that additional text will be added to the Outline Construction Traffic	Vegetation clearance will be limited to trimming of the hedgerow. In this location, there will be no hedgerow removal (refer to Annex A of the Outline Ecological Protection and Mitigation Strategy (EPMS) [REP5-081]), and no street furniture or lighting added.”. Additional text has been added to the Outline Construction Traffic Management Plan (CTMP) [EN010168/APP/7.22] (Revision 5).

ExQ2	Question to:	Question:	Applicant's Response
		Management Plan (CTMP) [REP4-058] to clarify.	
CH2.9b	Wiltshire Council	As a result, the council's concern that the Highway Improvement Works at this location would have an adverse impact on the character and appearance of the Rodbourne conservation area has been addressed.	The Applicant welcomes WC updated position and that the concerns have been addressed.
CH2.10	Historic England Wiltshire Council	Bradfield Manor Farmhouse (Grade I) The ExA notes that the SoCG between the applicant and Historic England [REP4-065] records that the approach to safeguarding designated heritage assets is agreed. With regards to Bradfield Manor Farmhouse, the SoCG records that Historic England acknowledge that in winter the screening would not be so effective and that in the longer distance views the harm caused by panels would not be mitigated. The SoCG records that Historic England consider that the panels would cause harm, but that harm would be less than substantial.	The Applicant welcomes WC agreement that the level of harm to Bradfield Manor would be at the lower level of less than substantial harm.

ExQ2	Question to:	Question:	Applicant's Response
		<u>Historic England:</u> 1) Can Historic England confirm if it agrees with the applicant's assessment in the Heritage Statement [APP-219] that the harm to Bradfield Manor Farmhouse Would be at the lower end of the scale of less than substantial harm? <u>Wiltshire Council:</u> 2) Do Wiltshire Council agree with Historic England's position on Bradfield Manor Farmhouse? If not, please explain its position including any additional mitigation measures that would be necessary and the level of harm that Bradfield Manor Farmhouse would experience. The council agrees with Historic England's assessment of the level of harm and also with the Applicant's qualifying assertion that this would be at the lower level of less than substantial harm.	
CH2.11a	Wiltshire Council	Grittleton House (Grade II*) The ExA notes Wiltshire Council's response to ExQ1 CH1.16 that it considers more	The Applicant acknowledges Wiltshire Council's position that the impact on the setting of Grittleton House in pure heritage terms is minor and temporary, and that the Council's primary concern relates to

ExQ2	Question to:	Question:	Applicant's Response
	The Applicant	robust and effective management proposals need to be incorporated in the outline management plans which could assist in mitigating the impact from the scheme on the business and hence on the future viability and conservation of the asset. Wiltshire Council: 1) Wiltshire Council are asked to clarify whether its concern is in relation to an adverse socio-economic impact which may have an indirect impact on the conservation of the asset, or is it primarily an impact on the setting of the asset in heritage assessment terms which in turn impacts the economic viability of the business (or both?) The council's concerns primarily relate to the adverse socio-economic impact stemming from construction within its setting which has potential to have an indirect impact on the conservation of the asset. Whilst related, the impact on the setting of the asset in purely heritage assessment terms is agreed to be minor and mitigated by temporary duration,	potential indirect impacts on the conservation of the asset through adverse socio-economic effects on the business. The Applicant maintains that there is no evidential basis to conclude that the Scheme would undermine the business viability or the subsequent conservation of Grittleton House. The Applicant has committed to mitigation measures to minimise physical impacts from the Scheme during construction on patrons of Grittleton House, and the provision of a Stakeholder Communication Plan as secured through the Outline CEMP [REP5-071] by Requirement 13 of Schedule 2 to the Draft DCO [REP5-012]. Further details regarding ongoing engagement and discussions are outlined in responses below (CH2.11b to CH2.11f).

ExQ2	Question to:	Question:	Applicant's Response
		and this is a secondary concern for the council.	
CH2.11b	Wiltshire Council The Applicant	<u>The Applicant and Wiltshire Council:</u> 2) Both parties are asked to provide an update of any further discussions that have taken place regarding further mitigation measures that could be put in place, while the applicant is asked to provide commentary on the level of engagement it has had with the owners of Grittleton House on this matter. The council has recently discussed this matter with the Applicant at meetings on 29 July 2026 in relation to the council's SoCG. The Council advised that in their opinion the following mitigation should be considered: 1) The council's preferred option would be the re-location of the compound.	Discussions between the Applicant and Wiltshire Council are ongoing in relation to this matter. The Applicant maintains that the location of the compound should remain as proposed, given its strategically identified position adjacent to the public highway. This location provides the access required to connect to the construction haul road needed to install and implement the 400kV cable route. Discussions regarding limiting the extent and activity of the compound remain ongoing. The Statement of Common Ground with Wiltshire Council [REP5-087] was updated at Deadline 5 to capture the Applicant's and Wiltshire Council's position on this matter.
CH2.11c	Wiltshire Council The Applicant	2) This would leave the cable works themselves – here, further mitigation should be considered in discussion with the owners and should include a mechanism for liaison	The Applicant confirms that consideration is being given to limiting the activity and use of this compound strictly to the activities required. Consultation with the owners of Grittleton is being undertaken at this stage,

ExQ2	Question to:	Question:	Applicant's Response
		to secure agreement / certainty around the timing and duration of the cable works.	and the Applicant would remain in direct engagement with them via the CLG once established. This is to be secured by the provision of a Stakeholder Communication Plan as secured through the Outline CEMP [REP5-071] by Requirement 13 of Schedule 2 to the Draft DCO [REP5-012] .
CH2.11d	Wiltshire Council The Applicant	3) A comprehensive compensation scheme should be agreed with relevant stakeholders (as requested by the council's Socio-Economic team – see response to SE2.3 below).	The Applicant has provided their reasoning for their objection to the implementation of a business compensation scheme within its response to question SE2.1 in The Applicant's Response to the Examining Authority's Second Written Questions [REP5-097]. The Applicant does not agree that such a compensation scheme is proportionate to the likely effects the Scheme will have on local business, given the level of mitigation measures secured through the DCO. The Applicant is continuing to engage with Wiltshire Council through the Statement of Common Ground [REP5-087] to understand the extent to which there is not yet agreement on the economic mitigation measures proposed by the Applicant.
CH2.11e	Wiltshire Council	In the council's discussions with the Applicant, it was considered that the Community Liaison Group, which would be established should the scheme be	See response to CH2.11c

ExQ2	Question to:	Question:	Applicant's Response
	The Applicant	consented, could be one mechanism for the engagement sought in point 2 above.	
CH2.11f	Wiltshire Council The Applicant	The Applicant informed the council that they would be having further discussions with the business owners at Grittleton House. The council will re-engage with the owners once notified that those meetings have taken place and concluded.	See response to CH2.11c.
CH1.12a	The Applicant Wiltshire Council Historic England	Adaptive Management of Mitigation With regards to the approach to mitigation for built heritage, the SoCG between the applicant and Wiltshire council [REP4-061] records that Wiltshire Council consider that the deadline 3 updates to the oCEMP [REP3-092] in line with the outline Landscape and Ecological Management Plan (oLEMP) [REP3-100] do not include any proposals for monitoring or assessing the efficacy of the landscaping in providing the mitigation envisaged or for making amendments if required in the future. <u>The Applicant:</u>	The Applicant notes this comment.

ExQ2	Question to:	Question:	Applicant's Response
		1) The applicant is asked to review and respond with proposed measures for the adaptive management of mitigation. <u>Wiltshire Council and Historic England:</u> 2) Wiltshire Council and Historic England are asked to propose any changes that should be made to the management plans to secure adequate monitoring, assessment of efficacy and adaptations to the mitigation measures as they deem necessary. The Outline Landscape and Ecological Management Plan [REP3-100] is intended to secure measures to minimise adverse effects on visual amenity, including the establishment, monitoring and management of hedgerow, tree and woodland planting intended to screen views of the authorised development from public rights of way, heritage assets, highways and residential receptors.	
CH1.12b	The Applicant Wiltshire Council	From a heritage perspective, the Applicant's Heritage Team should provide a list of heritage receptors where enhanced landscaping is being relied upon to achieve	The Applicant has agreed to provide a list of heritage assets where the reinforcement of landscape features has been proposed as mitigation. The list of heritage assets will be consolidated from the tables provided

ExQ2	Question to:	Question:	Applicant's Response
	Historic England	lowered residual effects (e.g. Bradfield Manor). Provision should be made in the plan for monitoring at appropriate timings throughout the operational phase to identify where screening objectives are not being achieved (for example due to changing climate and / or individual species pathology) and should specify how remedial management measures (including appropriate timescales for implementation) will be presented to and approved by the LPA.	6.3 Environmental Statement Volume 3, Appendix 12-8 Cultural Heritage Impact Assessment Tables [APP-232] The Applicant is continuing to discuss this matter with WC and will look to provide the list at Deadline 7 (anticipated to be appended to an appropriate management plan).
CH1.12c	The Applicant Wiltshire Council Historic England	More specific objectives for screening outcomes will need to be included in the detailed management plans and should refer back to the list noted above, which is assumed will form part of the Heritage Chapter. Objectives could be incorporated within the Management Prescriptions timetable. Please also see the response to DCO2.1 below.	The list of heritage assets referred to in CH1.12b will be consolidated from the 6.3 Environmental Statement Volume 3, Appendix 12-8 Cultural Heritage Impact Assessment Tables [APP-232]. As such, the list already forms part of the heritage chapter.
CH1.13a	The Applicant	Noise Impacts	The Applicant notes this comment.

ExQ2	Question to:	Question:	Applicant's Response
	Wiltshire Council Historic England Stop Lime Down	In response to Stop Lime Down's WR [REP1-167], it is noted that the applicant states [REP2-039] that the noise impact on built heritage assets has been assessed to not constitute a significant effect on health and quality of life. The applicant is asked whether the significance of effect on health or quality of life is an appropriate threshold for determining whether noise from the proposed development would have an adverse impact on the setting of heritage assets or whether noise can have a significant effect on the setting and understanding of a heritage asset without crossing the threshold of significance for health or quality of life? In response, please provide references to any relevant guidance. Wiltshire Council, Historic England and Stop Lime Down may also wish to comment on this matter. The council does not consider that the significance threshold used in the assessment of effects on health or quality of life is the appropriate threshold for assessing noise impacts on heritage assets. The	As stated in their response to CH2.13, the Applicant agrees with WC that health or quality of life are not as such a threshold for determining whether noise from the Scheme would have an adverse effect on the setting of a heritage asset (see [REP5-098]).

ExQ2	Question to:	Question:	Applicant's Response
		receptors and policy tests in each case are quite different.	
CH1.13b	The Applicant Wiltshire Council Historic England Stop Lime Down	With regard to heritage assets the question, in the context of this scheme, is most likely to relate to whether operational noise (for example from inverters, transformers, substations, battery storage facilities or associated infrastructure) will unacceptably reduce a sense of quietness and tranquility, which contributes to the understanding and experience of an asset, to the extent that its significance will be adversely impacted. If the significance of an asset relied heavily upon its experience and appreciation within a quiet, tranquil or remote environment, very low levels of additional noise (below those which constituted the threshold of significance for health or quality of life) could have a significant impact. An example might include the impact on a conservation area whose current character includes an absence of modern mechanical noise.	The Applicant directs Wiltshire Council to its response given to CH2.13 in the Applicant's Response to the Examining Authority's Second Written Questions [REP5-097]. The Applicant notes WC's comment and their summary that an adverse effect could occur during the operational phase where the noise of infrastructure "will unacceptably reduce a sense of quietness and tranquillity, which contributes to the understanding and experience of an asset, to the extent that its significance will be adversely impacted. If the significance of an asset" The Applicant has considered the potential for adverse effects as result of changes in background noise as a result of the Scheme to elements of setting that contribute to the significance of heritage assets.
CH1.13c	The Applicant	The Planning Practice Guidance (Historic Environment) and Historic England GPA3: The Setting of Heritage Assets (2017)	The Applicant considered the assessment to be inline Historic England Guidance The Setting of Heritage Assets Historic Environment Good Practice Advice in

ExQ2	Question to:	Question:	Applicant's Response
	Wiltshire Council Historic England Stop Lime Down	both provide relevant guidance but neither provides detailed advice on the assessment of noise or tranquility and their contribution to setting.	Planning Note 3 (Second Edition (https://historicengland.org.uk/imagesbooks/publications/gpa3-setting-of-heritageassets/heag180-gpa3-setting-heritage-assets/), which recognises “the way in which we experience an asset in its setting is also influenced by <i>other environmental factors such as noise...</i> ”
Draft Development Consent Order (dDCO)			
Questions within this section refer to the dDCO updated at Deadline 4 [REP4-004] (clean version) / [REP4-005] (tracked version)			
General Matters			
DCO2.1a	All Interested Parties and Statutory Undertakers	Residual Issues with the dDCO and Management Plans The dDCO is an important document and the ExA is under a duty to provide the SoS with a recommended version of the DCO. This is because the SoS is the decision maker. Therefore, even if the ExA were to recommend to the SoS that development consent should not be granted, the ExA must still append a recommended version of the DCO, thus it is important that the ExA is able to put forward the best DCO that it can.	The Applicant refers to its response to DCO2.4 in the Applicant's Response to the Examining Authority's Second Written Questions [REP5- 097] which sets out how the suggested amendment to the definition of “maintain” is unnecessary and the current wording is entirely consistent with the proposed and assessed development, given that complete replacement of all PV panels has been fully assessed in the Environmental Statement (ES). Furthermore, the definition of “maintain” in Article 2 must be read in conjunction with Article 5, which is the provision that authorises maintenance activities, which

ExQ2	Question to:	Question:	Applicant's Response
		The dDCO has been revised four times during the examination to date. A proportion of what has been requested by interested parties has been included in the Order, another proportion has been addressed through the updating of associated management plans, and other elements the applicant has resisted with reasons. While the position of many interested parties and/or statutory undertakers may be that development consent should not be granted, without prejudice to your position, you are invited to: 1) Outline any remaining or residual issues that you have with any articles, requirements or schedules of the dDCO, set out why the applicant has not yet resolved your concerns or why you are not content with the applicant's justification, and define what remedy or solutions you are seeking (including suggested redrafting if applicable) to address your concerns, and explain (make your case) why the applicant, the ExA and the SoS should consider such amendments to the dDCO. Statutory Undertakers are also	are only authorised insofar as they are not likely to give rise to any materially new or materially different environmental effects from those assessed in the ES. Additionally, the Applicant is mindful that the Joint Committee on Statutory Instruments maintains that "imposing a substantive obligation in a definition constitutes a failure to follow proper drafting practice" (JCSI 25th Report of Session 2002-03, paragraph 1.4). The Council's proposed drafting incorporates substantive obligations into the definition that should be set out within the operative provisions of the articles, and which are already found within article 5(3). The Applicant is content that no changes to the definition are required.

ExQ2	Question to:	Question:	Applicant's Response
		alerted to ExQ2 DCO2.23 which specifically relates to protected provisions. In the council's Post Hearing Submissions for ISH4 Action Point 2 [REP4-092], the council suggested revised drafting for the definition of 'maintain' as Article 5(3) only acts to constrain "scheduled replacement" and "replacement" to the environmentally assessed parameters in the ES. This was considered to still leave a very broad definition of 'maintain' that could permit whole-scheme replacement and re-powering by stages, that is not subject to appropriate development controls. The suggested drafting by the council was as follows (additions in blue and underlined): "maintain" includes inspect, repair, adjust, alter, remove, refurbish, reconstruct, replace (including scheduled replacement <u>of components of the authorised development where such replacement remains within the parameters assessed in the environmental statement and secured by the documents certified under article 42 and the requirements</u>) and improve any part of	

ExQ2	Question to:	Question:	Applicant's Response
		the authorised development, <u>but does not include the removal, reconstruction or replacement of the whole of the authorised development other than such scheduled replacement where it remains within those assessed and secured parameters</u>, and “maintenance” and “maintaining” are to be construed accordingly; As the Applicant has not yet provided a response to this suggested drafting, the council maintains its position in seeking this amendment.	
DCO2.1b	All Interested Parties and Statutory Undertakers	Furthermore, as the council has not yet had the opportunity to review the Applicant's proposed Permitted Preliminary Works Environmental Management Plan, the council maintains its position that this should be secured by Requirement for the undertaker to submit the Plan to the LPA for approval prior to works commencing. The current definition of ‘permitted preliminary works environmental management plan’ would require amendment and a new Requirement added into Schedule 2.	The Applicant welcomes Wiltshire Council's comments on the Permitted Preliminary Works Environmental Management Plan [REP5-106], which is already secured through Requirement 13. The plan has been provided as a final management plan given it includes the controls required to cover the permitted preliminary works when they commence. As such a new requirement is not required to be added to Schedule 2 of the draft DCO [REP5-012].

ExQ2	Question to:	Question:	Applicant's Response
DCO2.1c	All Interested Parties and Statutory Undertakers	As set out in its Post Hearing Submissions for ISH4 [REP4-092], the council considers that Article 9 should be amended as follows: •Replace Article 9(2)(a) with: "a permit may not be refused, or granted subject to conditions solely on the basis that the permit authority has imposed restrictions under section 58 (restrictions on works following substantial road works) or section 58A (restrictions on works following substantial roads works) of the 1991 Act" •Delete Article 9(4) •Add an Article 9(3)(b): "where Wiltshire Council is the permit authority, or where the refusal, condition or dispute relates to works to which Part 11 of Schedule 15 applies, Schedule 16 does not apply to any refusal of a permit, the grant of a permit subject to conditions, or any dispute arising under this article, and any such matter must be determined in accordance with the dispute resolution procedure in Part 11 of Schedule 15."	Please refer to references WC-134 and WC-135 in the Applicant's Response to Submissions Received at Deadline 4 [REP5-098].

ExQ2	Question to:	Question:	Applicant's Response
DCO2.1d	All Interested Parties and Statutory Undertakers	Furthermore, as indicated repeated, and most recently in its response to DCO2.8 below, the standard timescale for a major permit is 12 weeks, and not the 4 weeks currently noted in Article 16. However, as a means of compromise, as stated at ISH4, the council would be willing to accept 8-weeks for this scheme.	The Applicant refers to article 16(4) which provides that, before exercising the power to make temporary provision under paragraph (1), the Applicant must obtain the written consent of the traffic authority. Where the measures are within the locations listed in Schedule 8, no further consent is required from the traffic authority. The 4-week period specified in paragraph (5) is a notice provision only and does not require the traffic authority to review or approve the measures in this timeframe. As previously advised, specific construction traffic management measures are provided for in section 6.3 of the Outline Construction Traffic Management Plan [REP5-083]. The detailed traffic management measures will be set out in the detailed traffic management plan(s) submitted for approval under Requirement 15, where the Council will have 10 weeks to consider the application in accordance with Schedule 16.
DCO2.1e	All Interested Parties and Statutory Undertakers	With respect to Article 10, the council welcomes the recent changes from "may" to "must", but as set out in its comments on Deadline 4 submissions, considers that Article 10(4) should cross reference the LHA Protective Provisions in Part 11 to Schedule	The Protective Provisions in Schedule 15 are given operative effect by article 45. There is no need to include a cross-reference within article 10, and doing so would be to include drafting that has no legislative effect. It is noted that the JCSI considers that such information that is merely declaratory or intended to

ExQ2	Question to:	Question:	Applicant's Response
		15. Furthermore, the council re-iterates that the 6-week time limit for determination / approval under Article 47(3) is a real concern as the council will have no idea as to the scale or complexity of any highway works outside the DCO Order Limits, which the Applicant may seek to propose in the future. It is also unclear whether Schedule 16 is to apply in respect of highway technical approvals or consents.	assist the reader to understand provisions "should be put in the Explanatory Note" and to avoid "material of a non-legislative character" (JSCI 32 nd Report of Session 1997-98, paragraph 3).
DCO2.1f	All Interested Parties and Statutory Undertakers	Regarding Article 11, the council is seeking a formal s59 Agreement (Highway Act 1980) within the DCO to cover potential damage to the wider network caused by extraordinary trafficking. If this is in place, then this would potentially cover damage defects liability for included road lengths which have been subject to construction trafficking beyond the 12-month period.	The Applicant refers to WC1-004 in the Applicant's Response to Submissions Received at Deadline 4 [REP5-098] .
DCO2.1g	All Interested Parties and Statutory Undertakers	The council considers that Article 14(a) and (b) should specifically refer to the requirement for detailed design approvals to be sought in accordance with the LHA Protective Provisions in Part 11 to Schedule 15. The council's previously stated	The Protective Provisions in Schedule 15 are given operative effect by article 45. There is no need to include a cross-reference within article 10, and doing so would be to include drafting that has no legislative effect. It is noted that the JCSI considers that such information that is merely declaratory or intended to

ExQ2	Question to:	Question:	Applicant's Response
		concerns regarding Article 15 remain due to the broad powers conferred.	assist the reader to understand provisions "should be put in the Explanatory Note" and to avoid "material of a non-legislative character" (JSCI 32 nd Report of Session 1997-98, paragraph 3).
DCO2.1h	All Interested Parties and Statutory Undertakers	As indicated in DCO2.11 below, the council considers that Article 40 should be amended as follows: "(4) The undertaker may, for the purposes of the authorised development or in connection with the authorised development and subject to paragraph (2), remove the hedgerows specific in the table in Part 1 and the table in Part 2 of Schedule 12 (hedgerows to be removed) only to the extent set out in the ecological protection and mitigation strategy approved pursuant to requirement 8 in Schedule 2 (requirements)." Furthermore, in accordance with Wiltshire Council's consistently raised concern (most recently in the council's Post Hearing Submissions [REP4-092] and in comments on the Deadline 4 submissions to be submitted at Deadline 5), regarding the overly wide powers afforded by the scope of Schedule 12 and the inclusion of all	The Applicant notes this comment relating to the wording of Article 40. Please refer to the Applicant's response to DCO2.11 in the Applicant's Response to the Examining Authority's Second Written Questions [REP5-097]. The Applicant also notes that Stop Lime Down has confirmed this amendment to be unnecessary in its Responses to the ExA's second written questions [REP5-130]. The Applicant also refers to DCO2.10 in [REP5-097] which responds to the concern that the approach is overly broad and explains why it would be inappropriate to include restrictions within Schedule 12 and why the management plan is the preferred location for these. As set out in The Applicant's Response to Submissions Received at Deadline 4 [REP5-098], specifically in response to WC-128, the Applicant maintains that the powers to remove an extent of hedgerows in the areas identified within Part 1 and Part 2 of Schedule 12, as constrained by the Ecological Protection and Mitigation Strategy, are

ExQ2	Question to:	Question:	Applicant's Response
		hedgerows across the Order Limits, the council reiterates that it considers in the interests of precision, enforceability and avoiding uncertainty, the specific lengths of hedgerow authorised for removal should be stated within Schedule 12, thereby replacing the generic term "part" with a quantified measurement (metres) corresponding to the approved plans. The stated measurements should, at the very least, specify the minimum and maximum extent of hedgerow that may need to be removed from each of the hedgerows listed. However, the stated measures should not be interpreted as a requirement to remove the full permissible length. Where detailed design, construction requirements, or site circumstances allow, the Applicant should seek to minimise impact 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	appropriate and typical of the approach across solar DCOs. The Applicant provided at Deadline 5 an updated Hedgerow Removal Plan within Annex A of the Outline EPMS [REP5-081] in response to Question EB2.11 of the Examining Authority's Second Written Questions (ExQ2) [PD-014]. The updated plan provides minimum and maximum extents of hedgerow removal at each location. The Applicant has sought to minimise hedgerow loss as far as is reasonably practicable throughout Scheme design, in line with the mitigation hierarchy, and will continue to do so at detailed design stage and during construction, as set out by Wiltshire Council.

ExQ2	Question to:	Question:	Applicant's Response
		hedgerow habitat and associated landscape, ecological and arboricultural value. This would ensure continuity across the DCO documents, notably in this regard, the dDCO Schedule 12, the EPMS and Hedgerow Removal Plans contained therein at Annex A, and the HRA, and would provide greater certainty and assurance of the imposition of the restrictions set out in the EPMS and as cited in Article 40(4) and the footnotes in Schedule 12.	
DCO2.1i	All Interested Parties and Statutory Undertakers	With regards to Article 41, Wiltshire Council considers that the five working day notice period set out in paragraph 4(b) should be 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.	The Applicant has considered Wiltshire Council's request regarding the extension of the five working day notification period to trees within Conservation Areas. Rather than amending Article 41, the Applicant has introduced an additional operational commitment within the Outline OEMP [EN010168/APP/7.13] (Revision 6). This requires the Undertaker to provide Wiltshire Council with not less than five working days' written notice where, during operation of the authorised development, it is determined that the felling or removal of a retained Category A or Category B tree, or a retained veteran or ancient tree, is reasonably necessary due to disease, structural condition, safety considerations or operational

ExQ2	Question to:	Question:	Applicant's Response
			requirements associated with the authorised development. The commitment also makes appropriate provision for urgent works where a tree presents an immediate risk of serious harm to persons or property, in which case prior notification would not be required and Wiltshire Council would instead be notified in writing as soon as reasonably practicable following completion of the works. The Applicant considers that this provides an appropriate and proportionate mechanism for ensuring that Wiltshire Council is notified in advance of works to the retained trees of greatest arboricultural value and sensitivity during operation, including where such trees are located within a Conservation Area. The Applicant therefore does not consider that a separate amendment to Article 41 to capture all trees subject to Section 211 notification requirements is necessary. The revised commitment is included within the Outline OEMP [EN010168/APP/7.13] (Revision 6) submitted at Deadline 6.

ExQ2	Question to:	Question:	Applicant's Response
DCO2.1j	All Interested Parties and Statutory Undertakers	With regards to Article 47, please see council's concerns relating to highway matters in relation to the deemed consent provision.	Please refer to the Applicant's response to DCO2.13 in the Applicant's Response to the Examining Authority's Second Written Questions [REP5-097] which sets out why a six-week timetable is appropriate for Article 47.
DCO2.1k	All Interested Parties and Statutory Undertakers	In Schedule 2, Requirement 2, the council maintains that the written scheme in (1) should be submitted to and approved by the relevant planning authority, rather than just submitted to it. This requested drafting is in a number of made solar DCOs and therefore there is substantial precedent for it.	Please refer to reference WCD1-018 in the Applicant's Response to Submissions Received at Deadline 2 [REP3-129] , which sets out the reasons why the Applicant considers this proposal would not meet the tests for DCO Requirements.
DCO2.1l	All Interested Parties and Statutory Undertakers	The council maintains that the Community Liaison Group secured through Requirement 4 of Schedule 2 should remain in operation during the construction, operation and decommissioning stage, in relation to the activity that is being undertaken. The council considers that it should remain as originally established for a period of 6 years in initial operation, and then be reconvened during periods of maintenance / replacement and for decommissioning.	The Applicant notes the suggestion for the Community Liaison Group (CLG) to remain active throughout the Scheme's entire operational lifespan and maintains that such a requirement is disproportionate to the anticipated level of site activity during normal operations. Under Requirement 4 of the Draft DCO [REP5-012] , the CLG is secured through the construction period and until the first anniversary of final commissioning to ensure any residual post-construction matters are addressed.

ExQ2	Question to:	Question:	Applicant's Response
			To ensure long-term accountability, the Applicant has committed to providing a designated community contact, within the operation and maintenance team for the up to 60-year operational life of the Scheme. This role serves as a continuous point of contact for local communities and ensures that any enquiries during the operational phase are managed efficiently. A Community Liaison Manager will be appointed during replacement events and the decommissioning phase and the CLG will be formally re-established at least six months prior to decommissioning to ensure local issues inform the detailed management plans for that stage.
DCO2.1m	All Interested Parties and Statutory Undertakers	The Council considers that Requirement 7 (LEMP) should include a specific landscape monitoring and adaptive management measure. See comments under part 2 of this question for [REP3-100] Outline LEMP (Rev 2) for further justification and comment. The Council suggests the following rewording of Requirement 7 as follows; 7. (1) No part of the authorised development may commence until a written landscape and ecological management plan has	Please refer to CH2.12 in the Applicant's Response to the Examining Authority's Second Written Questions [REP5-097]. The Applicant considers that the Outline CEMP [REP5-071] and Outline LEMP [REP5-079] are appropriate and proportionate and secure that the approved landscape mitigation is successfully implemented and maintained over time. The Applicant notes that the detailed LEMP must be substantially in accordance with the Outline LEMP [REP5-079], which contains (and therefore secures) the mitigation and monitoring measures referred to.

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		been submitted to and approved by the relevant planning authority for that part in consultation with the relevant statutory nature conservation body. (2) The Plan shall include management and monitoring of prescribed ecological and landscape mitigation and enhancement measures against specific detailed objectives and associated success criteria at regular intervals, set out reporting arrangements and remedial or adaptive management measures where monitoring clearly identifies that the prescribed landscape, or visual screening objectives are not being achieved. (3) The Plan shall include measures to minimise adverse effects on visual amenity, including the establishment, monitoring and management of hedgerow, tree and woodland planting intended to screen views of the authorised development from public rights of way, heritage assets, highway and residential receptors as identified within the ES/LVIA. (4) Monitoring shall identify where landscape and ecology objectives and success criteria	The Outline LEMP [REP5-079] establishes a framework for the planting, management and monitoring of landscape and ecological mitigation and enhancement habitats. Importantly, the management approach is not limited to the implementation of fixed management prescriptions, but provides for management to respond to the results of monitoring and to the condition and establishment of habitats and landscape planting over time. For example: • Paragraph 1.4.1 provides for more frequent monitoring during the first five years of operation, when habitats are in the early stages of development, expressly to identify issues at an early stage so that remediation measures or changes in management can be applied. • Paragraphs 1.4.2–1.4.4 establish a habitat monitoring regime incorporating UKHab surveys and condition assessments, botanical quadrats and other appropriate surveys. UKHab surveys and botanical quadrats are indicatively proposed in Years 1, 2, 3 and 5 following construction and every five years thereafter for the lifetime of the Scheme. The Outline LEMP [REP5-079] expressly states that this

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		are not being achieved and specify remedial and/or adaptive management measures. (5) The landscape and ecological management plan must be substantially in accordance with the outline landscape and ecological management plan. (6) The landscape and ecological management plan must be implemented as approved."	monitoring will enable remedial measures to be implemented accordingly. - Paragraph 1.3.15 requires plants and trees found to be dying, damaged or diseased to be replaced during Years 1–5. Thereafter, significant failures identified through monitoring will also require replacement planting, with the specification for that planting to be appropriate to the conditions on site. The Outline LEMP [REP5-079] expressly recognises in this context the potential for conditions to change over the 60-year lifetime of the Scheme. - The habitat-specific management prescriptions similarly provide for responsive management. This includes watering trees and shrubs as required to achieve successful establishment, annual inspection of hedgerow trees, replacement or securing of guards and stakes where necessary, and remedial action where monitoring identifies the spread of undesirable species. - Annex A provides an Outline Management Prescription Timetable, including annual checks and replacement of planting failures during the

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			establishment period and ongoing replacement of significant failures identified subsequently. No amendments are therefore required to the drafting of the Requirements.
DCO2.1n	All Interested Parties and Statutory Undertakers	In the council's response to Action Point 5 arising from ISH4, the council sought a response from the Applicant as to how the wording "substantially in accordance with" would not erode the secured mitigation with regards to Requirement 7, Requirement 8, Requirement 9, Requirement 11 and Requirement 12. In the absence of a response from the Applicant yet, the council maintains its concern with the current drafting for these Requirements in this respect.	The wording "substantially in accordance with" is standard drafting for DCO Requirements and balances the need for flexibility in the detailed design of the Scheme and the mitigation in the management plans with the need to secure all such necessary mitigation.
DCO2.1o	All Interested Parties and Statutory Undertakers	As stated within its Post Hearing Submissions for ISH4, the council still maintains that its alternative drafting for Requirement 15 is required.	Please refer to WC-157 in the Applicant's Response to Submissions Received at Deadline 4 [REP5-098] .
DCO2.1p	All Interested Parties and Statutory	With regards to Requirement 20, the council maintains that further comfort is required regarding the	The Applicant has discussed the provision of information relating to decommissioning securities with Wiltshire Council and included this commitment in the

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	Undertakers	Applicant's decommissioning security that has been stated would be put in place with the landowners through the lease agreements. In the absence of an alternative agreed position with the Applicant at the current time, the council would support SLDs suggested inclusion of the Helios DCO drafting requiring the undertaker to notify the LPA no later than year 15 of operation that the requisite decommissioning security in the form as required by the landowners had been put in place. However, the council notes that discussions with the Applicant are ongoing in this regard. Furthermore, the council continues to contend that a provision must be included within Requirement 20 for the undertaker to formally submit to the LPA that all decommissioning activities have been completed for the council's approval and confirmation.	draft Section 106 Agreement. This will align with SLD's suggested commitment relating to the Helios Scheme. The Applicant has provided a draft of the s106 agreement to Wiltshire Council and is awaiting comments. In respect of the completion of decommissioning, the outline decommissioning strategy provides for a monitoring report to be submitted quarterly and on completion, to assist the Council with ensuring compliance with Requirement 20. Please refer to DCO2.19 in the Applicant's Response to the Examining Authority's Second Written Questions [REP5-097].
DCO2.1q	All Interested Parties and Statutory	Within Wiltshire Council's LIR, the council set out a number of Requirements that it considered necessary. Whilst discussions are ongoing with the Applicant to ensure that	The Applicant notes this comment and the Mitigation Route Map [REP5-102] was submitted at Deadline 5.

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	Undertakers	all requirements are adequately covered within the management plans, the council reserves the right to push for additional requirements should sufficient progress not be made during the course of the examination. The council considers that the Mitigation Route Map which the Applicant is currently preparing will assist in identifying where further strengthening of commitments is required.	
DCO2.1r	All Interested Parties and Statutory Undertakers	The council's position with regards to Schedule 12 is outlined in comments contained above.	Please refer to DCO2.1h above.
DCO2.1s	All Interested Parties and Statutory Undertakers	With respect to Schedule 13, the council considers that the Arboricultural Impact Assessment and Arboricultural Method Statement should be included within this schedule. Furthermore, depending upon the approach taken with regards to the Permitted Preliminary Works Environmental Management Plan, this item may need to be changed to "Outline".	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 [REP5-071] . 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

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			considers the current drafting to be appropriate and proportionate.
DCO2.1t	All Interested Parties and Statutory Undertakers	At present, the LLFA is not seeking any further substantive amendments to Part 9 of Schedule 15 of the dDCO. The remaining concerns relate primarily to the implementation, monitoring, maintenance, review and long-term management of measures secured through the associated management plans and supporting documentation rather than the drafting of the dDCO itself. The Protective Provisions for the Benefit of the Local Highway Authority, Part 11 of Schedule 15, are not yet agreed. The council will confirm its preferred drafting at Deadline 6.	The Applicant notes Wiltshire Council's confirmation that it is not presently seeking further substantive amendments to Part 9 of Schedule 15 of the dDCO. The protective provisions at Part 11 of Schedule 15 remain under discussion. The remaining concerns regarding the implementation, monitoring, maintenance, review and long-term management of measures secured through the associated management plans and supporting documentation are substantively addressed through the relevant management plans and the Mitigation Route Map [REP5-102], which provides the consolidated audit trail between the mitigation relied upon, associated monitoring requirements and the DCO mechanisms by which those measures are secured. For hydrology, flood risk and drainage matters, this position is also addressed at paragraphs 3.7.20 and 3.7.25 of the Statement of Common Ground with Wiltshire Council [REP5-087] and is not repeated here.

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DCO2.1u	All Interested Parties and Statutory Undertakers	In relation to Schedule 16, the council maintains its position set out at Deadline 2, in that the period for discharge applications should be twelve weeks and not the ten weeks currently specified in 2(2). Furthermore, the council considers that the period for requesting further information should be extended to 20 working days in 3(2), which would be in line with the Mallard Pass Solar Farm DCO. The following wording should also be included against each numerical charge within Clause 5 to state "or the fees applicable at the time of application by the Applicant". This is due to the extended period in which applications for discharge will be made given the scheme's stated operational life of 60 years. Whilst the council accepts the Applicant's rationale with regards to the Register of Requirements that this was mainly put in place for transport DCOs due to discharging decisions being made by the Secretary of State, the council maintains that due to the considerable public interest in this scheme, a mechanism is required to keep the public informed on the status of discharge	Please refer to WCD1-032 in the Applicant's Response to Submissions Received at Deadline 2 [REP3-129] . The Applicant considers ten weeks to be appropriate for the Council to determine an application. It also considers 15 working days to be an appropriate timescale to request further information, noting that it is in the Applicant's interests to collaborate with the Council before formally submitting an application to discharge a Requirement in order to maximise the likelihood of the application being approved. The Applicant understands that the Council will publish applications to discharge Requirements on its planning portal, being the effective mechanism to keep the public informed on the status of discharge applications.

ExQ2	Question to:	Question:	Applicant's Response
		applications. The council considers that the Applicant being responsible for maintaining a Register of Requirements would be an effective mechanism to do this.	
DCO2.1v	All Interested Parties and Statutory Undertakers	2) Outline any remaining or residual issues that you have with any of the management plans/ documents listed below, set out why the applicant has not yet resolved your concerns or why you are not content with the applicant's justification, and define what remedy or solutions or amendments you are seeking to address your concerns within the drafting of the relevant management plan(s)/ document(s): 1. Outline Construction Environmental Management Plan (Latest Version, Revision 5 [REP4-049]) Given the commitment of the Applicant to commence communications post examination, the council considers that the Outline Construction Environmental Management Plan Section 2.14 needs to be updated to reflect earlier engagement. i.e. 2.14.3 states "A Community Liaison Officer (CLO) (or alternative) would be appointed to	The Applicant notes this comment. The Terms of Reference for the Community Liaison Group (CLG) will clearly set out the need to appoint the Community Liaison Officer prior to construction. The commitment for the CLG is secured through Requirement 4 of Schedule 2 to the Draft DCO [REP5-012]. For clarity only, the Applicant has amended the Outline CEMP [EN010168/APP/7.12] (Revision 7) produced at Deadline 6 of Examination to reaffirm this position.

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		lead discussions with local communities during construction." In light of the ongoing discussions, the wording should be amended to refer to appointment of a CLO prior to construction, rather than during.	
DCO2.1w	All Interested Parties and Statutory Undertakers	As per the council's previous comments at Deadline 4, the council considers that further commitments and mitigations are required to be included within this Plan once there was more knowledge about carbon emissions, i.e. from the procurement process for scheme construction and materials. Consideration should also be given to incorporating requirements for GHG emission and carbon reduction plans into the specification and contracts.	The Outline CEMP [REP5-071] submitted at Deadline 5 confirms that a sustainable procurement process which includes consideration to minimise carbon emissions where feasible will be undertaken as part of supply chain ESG assessments.
DCO2.1x	All Interested Parties and Statutory Undertakers	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: <i>"Any repairs to the access track at North Bincombe Wood shall be limited to the infilling of potholes</i>	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 has provided updated wording in the Outline CEMP [EN010168/APP/7.12] (Revision 7) at Deadline 6.

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		<i>using no-fines gravel and topsoil only and shall be undertaken solely for the purposes of hedgerow / vegetation management."</i> This restriction would minimise impacts within Root Protection Areas and avoid the gradual intensification or upgrading of the track. The council remains of the view that formal monitoring arrangements during construction for retained trees require strengthening. A schedule of regular inspections during construction by the Applicant's arboriculturist covering all trees, with reporting to the LPA of: 2. Category A trees. 3. Category B trees. 4. Veteran trees. 5. Ancient trees. Inspection findings should be submitted to the LPA together with recommendations for remedial actions where required, to ensure emerging issues are identified and	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 nature of the Scheme and the controls already secured. The Applicant is currently considering Wiltshire Council's comments regarding operational monitoring 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. The Applicant confirms that the appointed ACoW will be a suitably qualified and experienced arboricultural professional with the necessary competence to undertake the role, including appropriate experience of supervising works in the vicinity of retained trees

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		addressed promptly. The council considers that greater certainty is required regarding professional competence of the Arboricultural Clerk of Works. Given the sensitivity of the affected tree resource, assurance is required that suitably qualified and experienced personnel oversee works with potential arboricultural implications. The council seek a commitment that the following information is submitted to and approved by the LPA prior to commencement of relevant works: 6. The name of the appointed ACoW. 7. Relevant qualifications. 8. Professional memberships. 9. Demonstrable experience of working with veteran and ancient trees. Wiltshire Council requests that there is a 10 metre buffer from the boundary of the footprint for the temporary construction compounds to any	where required. The Applicant has updated Table 4 of the Outline CEMP [EN010168/APP/7.12] (Revision 7) to provide further clarity regarding the required qualifications, experience and competence of the ACoW. 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. Temporary construction compounds will be located outside the RPAs of retained trees, regardless of quality category.

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		Category A, Category B, Veteran or Ancient tree.	
DCO2.1y	All Interested Parties and Statutory Undertakers	From an LLFA perspective, the substantial improvements made to the Outline CEMP, particularly the inclusion of a Water Management Plan, temporary drainage provisions, water quality monitoring, flood response measures, reinstatement of drainage systems and governance arrangements are welcomed. However, the CEMP still relies heavily on future detailed Water Management Plans, method statements and site-specific controls. The LLFA considers that further clarity is required regarding how temporary drainage arrangements, runoff controls, sediment controls, inspection procedures, performance criteria, corrective actions and arrangements for managing cumulative construction activities across the Solar PV Sites and Cable Route Corridor will operate in practice. The Applicant has identified appropriate controls but the monitoring, intervention and assurance arrangements remain high level in a number	The Applicant notes Wiltshire Council's acknowledgement of the substantial improvements made to the Outline CEMP [REP5-071], including the Water Management Plan, temporary drainage provisions, water quality monitoring, flood response measures, reinstatement of drainage systems and governance arrangements. The Applicant does not agree that the reliance on a detailed Water Management Plan represents a gap in the secured construction-phase controls. The purpose of the Outline CEMP [REP5-071] is to establish the principles, minimum controls and governance framework with which the detailed CEMP must comply. The detailed CEMP, including the Water Management Plan, must be prepared substantially in accordance with the Outline CEMP [REP5-071] and approved by the relevant planning authority pursuant to Requirement 13 of the dDCO before the relevant construction works commence. The Water Management Plan is therefore the mechanism by which the secured outline requirements are translated into the site-specific arrangements appropriate to the

ExQ2	Question to:	Question:	Applicant's Response
		of areas and are not always clearly linked to measurable performance outcomes. Further clarification within the Water Management Plan framework is required regarding: 10.inspection frequencies; 11.monitoring parameters; 12.intervention criteria; 13.reporting arrangements; 14.corrective actions; and 15.management of overlapping activities across different parts of the Scheme.	final construction sequence, temporary drainage layout, ground conditions and receiving environment. Table 5 of the Outline CEMP [REP5-071] already establishes the substantive construction water-management controls. These include monitoring and maintenance of temporary drainage throughout construction; development of temporary drainage systems to prevent untreated sediment-laden runoff entering surface water drains or watercourses; use and maintenance of temporary lagoons, tanks, bunds, silt fencing, cut-off drainage, settlement features and other treatment measures where required; appropriately sized temporary runoff storage; treatment of construction runoff before discharge; protection and recording of existing agricultural drainage; inspection and maintenance of SuDS and sediment-control measures; and separate management of potentially contaminated waters. Where monitoring identifies unsatisfactory levels of suspended solids or other pollutants, additional measures are required, which may include alteration of site drainage and settlement facilities or use of additional treatment measures. The Water Management Plan will define the monitoring locations, parameters, frequencies, methods and trigger levels appropriate to the construction activity

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			and sensitivity of the receiving environment. It will also address the existing drainage features and overland flow routes relevant to the works, temporary drainage and runoff controls, exceedance arrangements and the interaction of those controls with compounds, haul routes, stockpiles, excavations and watercourse crossings. This allows monitoring and intervention criteria to be based on the actual risks presented by each phase of construction rather than applying generic numerical thresholds irrespective of location, activity or receptor. The governance and assurance arrangements are also already established. The Outline CEMP [REP5-071] requires defined roles and responsibilities, including the Construction Project Manager and Environmental Manager, together with monitoring, inspections, audits, document control and environmental emergency procedures. Monitoring and reporting are required throughout construction to demonstrate the effectiveness of the approved controls and allow corrective action where necessary. The Environmental Manager will be present during construction and when new activities commence, record deviations from the detailed CEMP and the action taken, undertake walkover surveys and arrange regular formal inspections and audits. Actions arising from walkover

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			surveys will be recorded within an Environmental Action Schedule, discussed with the Site Manager and issued weekly for action. Records of monitoring, inspections, investigations and corrective actions will be retained. The framework also provides for review and adaptation. Where monitoring, inspections or an incident demonstrate that existing controls are insufficient, additional control measures can be introduced through the detailed CEMP. The detailed CEMP is subject to review throughout construction, while existing mitigation cannot be amended without prior agreement with the relevant local authorities. This provides a clear mechanism for escalation and corrective action without requiring every possible construction circumstance to be prescribed before the contractor, detailed design and construction sequence are known. Flood response is similarly not dependent solely upon formal Environment Agency flood warnings. Weather forecasts, available flood warnings, observed site conditions and local waterway levels will inform the management of construction activities, including at smaller Ordinary Watercourses for which a formal warning service may not be available. Temporary

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			drainage and flood-management arrangements can therefore respond to actual and forecast conditions during the works. Where activities overlap or interface between the Solar PV Sites and Cable Route Corridor, the Outline CEMP [REP5-071] requires the detailed construction arrangements to address temporary drainage, sequencing and contingency measures collectively. The fact that separate detailed CEMPs may be prepared for different parts of the Scheme does not remove this requirement. The Outline CEMP [REP5-071] expressly defines the detailed CEMP collectively to include all detailed CEMPs prepared for the Scheme, ensuring that interfaces between packages remain subject to the same overarching controls. The precise locations, dimensions and configurations of temporary drainage measures cannot reasonably or usefully be fixed at this stage because they depend upon the final construction sequence, contractor methodology, detailed ground conditions, temporary working areas and the location of active works. Fixing those details before those matters are known would not provide greater environmental protection. The appropriate control is to secure the principles, outcomes, governance and minimum measures now,

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			and require the site-specific details to be developed and approved through the detailed CEMP and Water Management Plan. The relationship between the construction-phase hydrology mitigation, monitoring requirements and the mechanisms by which those measures are secured is also consolidated in Table 3-5: Hydrology, Flood Risk and Drainage of the Mitigation Route Map [REP5-102]. The Applicant therefore considers that the construction water-management framework provides the implementation, inspection, monitoring, reporting, intervention, corrective-action and assurance arrangements sought by the LLFA, and that no substantive gap remains in the construction-phase drainage controls.
DCO2.1z	All Interested Parties and Statutory Undertakers	•Outline Operational Environmental Management Plan (Latest Version, Revision 5 [REP4-051]) As per the council's previous comments at Deadline 4, the council considers that further commitments and mitigations are required to be included within this Plan once there was more knowledge about carbon emissions, i.e. from the procurement process for scheme construction and materials.	The Applicant directs Wiltshire Council to its response at WC1-071 of the Applicant's Response to Submissions Received at Deadline 4 [REP5-098]. The Outline CEMP [REP5-071] submitted at Deadline 5 confirms that a sustainable procurement process which includes consideration to minimise carbon emissions where feasible will be undertaken as part of supply chain ESG assessments.

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		Consideration should also be given to incorporating requirements for GHG emission and carbon reduction plans into the specification and contracts.	
DCO2.1aa	All Interested Parties and Statutory Undertakers	The council considers that reference to the Innovation Forum should be contained within this Plan in relation to adopting emerging best practices / technological advances during the scheme life.	The Applicant will update the Outline OEMP [EN010168/APP/7.13] (Revision 6) at Deadline 6 accordingly.
DCO2.1ab	All Interested Parties and Statutory Undertakers	The council remains concerned that the oOEMP does 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. The council also questions the categorisation of a number	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 nature of the Proposed Development and the controls already secured. The Applicant does not agree that any trees have been downgraded from Veteran to Category A1. The

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		of trees identified within the Order Limits identified as A1 which appear to have been subsequently downgraded from Veteran. 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. 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.	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 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 appropriate for the purposes of the assessment. Notwithstanding this, in the interest of progressing this matter, the Applicant is willing to apply the same RPA buffers to A1 trees as though they were veterans, while affording them the mitigation that would be provided to veteran trees. The Applicant does not consider that a periodic monitoring and reporting regime for all trees throughout the operational life of the Scheme is necessary or proportionate. The operational phase of

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		The council seeks inclusion of a requirement that: 16. 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. 17. Monitoring findings are documented and reported to the LPA. 18. Monitoring identifies any deterioration attributable to the development and recommends appropriate corrective measures. 19. Reports are submitted at agreed intervals and maintained as part of the operational environmental management record. 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	the Scheme would not ordinarily involve activities that would give rise to ongoing effects on retained trees requiring such a monitoring regime. However, in response to the Council's concerns regarding higher-value trees, the Applicant has agreed to strengthen the controls within the Outline OEMP [REP5-073]. At Deadline 6, the Outline OEMP [EN010168/EXAM/7.13] (Revision 6) has been updated to require the Undertaker to provide Wiltshire Council with not less than five working days' written notice where the felling or removal of a retained Category A or Category B tree, or a retained veteran or ancient tree, is considered reasonably necessary during operation due to disease, structural condition, safety considerations or operational requirements associated with the authorised development. An exception is provided for works urgently required where a tree presents an immediate risk of serious harm to persons or property, in which case Wiltshire Council will be notified as soon as reasonably practicable following completion of the works. The Applicant has also agreed to strengthen the provisions relating to replacement planting. The Outline LEMP [EN010168/EXAM/7.18] (Revision 4) has been updated at Deadline 6 to provide that, where

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		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. The council seeks provisions requiring LPA approval of: 20. Tree species selection. 21. Planting sizes and specifications. 22. Planting locations. 23. Quantities and replacement ratios. 24. Establishment and maintenance regimes.	a retained Category A or Category B tree, or veteran or ancient tree identified within the Arboricultural Impact Assessment is felled or removed during operation, replacement planting will be undertaken where reasonably practicable and appropriate. The replacement planting will comprise an appropriate native species of a size and specification suitable for the location and will normally be undertaken during the first appropriate planting season following removal. Planting will be undertaken at or in reasonable proximity to the location of the removed tree where practicable, or elsewhere within the relevant Solar PV Site where this would provide greater landscape, ecological or arboricultural benefit. Replacement trees will also be subject to appropriate establishment and maintenance measures in accordance with the final LEMP. The Applicant considers that these additional provisions provide an appropriate and proportionate mechanism for Wiltshire Council to be made aware of the proposed removal of higher-value retained trees during operation and secure suitable replacement planting where appropriate. The Applicant does not consider that prescribing specific replacement ratios, species, planting sizes or locations for presently unidentified future tree losses would be appropriate, as

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			the appropriate response will necessarily depend upon the circumstances of any future removal, including the tree concerned, reason for removal, location and prevailing arboricultural and ecological conditions.
DCO2.1ac	All Interested Parties and Statutory Undertakers	In Table 3 against the heading 'Impacts on biodiversity features during the operation of the Scheme' it is stated in respect of lighting: <i>"Permanent lighting is not required within the Solar PV Arrays for the operational phase. Motion sensing security lighting will be provided within substations and within the BESS Area, to be used only for maintenance and security purposes. A sensitive lighting strategy as part of the detailed OEMP will specify how this artificial lighting will be installed and used, which will serve to mitigate adverse impacts on ecological receptors which are adversely impacted by lighting, such as bats."</i> This refers to a sensitive lighting strategy to be contained within the detailed OEMP. It is assumed that this will be set out in Section 2.7 of the OEMP which is titled 'Control of Light'. Whilst it is recognised that the OEMP currently comprises the outline version rather	The Applicant notes Wiltshire Council's comments pertaining to the Outline Operational Environmental Management Plan (OEMP) [REP5-074]. The Applicant confirms that full details of the sensitive lighting strategy will be provided in Section 2.7 of the detailed OEMP, to mitigate potential adverse impacts on ecological receptors where the use of artificial lighting is required during operation. The design of this strategy will follow the principles set out within Method Statement 4 of the Outline EPMS [REP5-081], and in line with recommendations set out in GN08/23 Bats and Artificial Lighting at Night (Institute of Lighting Professionals, 2023). In response to the Council's comment regarding badgers, the Applicant confirms that alternative measures to avoid and mitigate potential impacts to newly excavated badger setts during operation will be considered, with sett closure under licence adopted as a last resort measure, in line with the mitigation hierarchy. Details of such measures will be provided in the detailed OEMP, including consultation between the

ExQ2	Question to:	Question:	Applicant's Response
		than the detailed version, it is nevertheless evident that the OEMP and Section 2.7 currently lacks sufficient detail regarding the proposed sensitive lighting strategy. It is the council's view that it should be possible to provide more detail in the outline version of the OEMP than has been provided to date given that the key principles and best practice measures to be complied with and detailed in the sensitive lighting strategy should already be established. It should, therefore, be possible to provide at least an outline sensitive lighting strategy within the outline OEMP so that the ExA and host authority has sufficient information regarding the proposed lighting strategy to facilitate an informed review of the Scheme proposals, and the assessment of the operational phase of the development detailed in the ES and HRA, and to also inform the preparation of the Report on the Implications for European Sites (RIES) by the ExA. In respect of badgers, under the heading 'Impacts on biodiversity features during the operation of the Scheme' in Table 3 it is	Environmental Manager and suitably experienced ecologist on discovery of any newly excavated setts during operation, to inform appropriate avoidance and mitigation measures as required.

ExQ2	Question to:	Question:	Applicant's Response
		specified: <i>"Should new badger setts be excavated in areas where they come into conflict with ongoing management activities, then these setts would likely be excluded under a mitigation licence from Natural England. The mitigation licence would secure any compensation measures (such as the creation of artificial setts) required, the exclusion of the setts, and would ensure any impacts to setts are compliant with current legislation."</i> Whilst the council acknowledges that instances may arise where the only viable option is to apply for a mitigation licence in order to exclude/ close a sett, nevertheless, it is considered that the outline OEMP should include text in Table 3 that sets out that in the first instance, it would be established whether any other avoidance or mitigation measures could be implemented to avoid the need to exclude a sett, such as ascertaining if the management activities could be conducted in a different manner or use different machinery, technology or plant. It is considered that there should be some provision within Table 3 for the feasibility of	

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		employing other avoidance and mitigation measures to be investigated in the first instance in accordance with the mitigation hierarchy.	
DCO2.1ad	All Interested Parties and Statutory Undertakers	The inclusion of an adaptive skylark mitigation section within Table 3 is noted. However, it is considered that it lacks sufficient detail regarding what would comprise the trigger points for instigation of adaptive mitigation and / or management, such as the number of breeding pairs.	The Applicant notes this comment. Further detail relating to adaptive skylark mitigation will be provided in the detailed Operational Environmental Management Plan (OEMP) and detailed Landscape and Ecological Management Plan (LEMP) documents, which will be prepared in consultation with Wiltshire Council. The Applicant considers the post-consent detailed design stage to be the appropriate point at which these measures are defined, as this will enable the mitigation strategy to be informed by the final scheme design and site conditions. These plans will include clear success criteria, monitoring requirements, and triggers for the implementation of remedial measures, including specified habitat condition targets. The Applicant considers the number of breeding pairs present within the mitigation areas to be an inappropriate metric for triggering adaptive management measures. This is because skylark breeding occupancy within any given year is influenced by a range of factors that are beyond the

ExQ2	Question to:	Question:	Applicant's Response
			Applicant's control. These include, but are not limited to, weather conditions, overwinter survival rates, and the land-use changes, cropping regimes and agricultural practices adopted within the wider surrounding landscape. Consequently, the appropriate trigger for adaptive management should be an assessment of whether the mitigation areas are providing suitable habitat conditions for breeding skylark, rather than the presence or number of breeding pairs recorded in any particular year. The ecology of skylark in lowland farmland settings is well understood and the habitats proposed within the mitigation areas represent what is currently regarded as optimal breeding habitat for skylark, based on the available evidence base, published research, and relevant best-practice guidance. Adaptive management measures should therefore comprise changes to the method and timing of habitat management within the delineated area, to be informed by monitoring evidence on habitat quality, condition, or management objectives are not being achieved, rather than fluctuations in skylark numbers that may arise from external factors beyond the Applicant's influence.

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DCO2.1ae	All Interested Parties and Statutory Undertakers	The LLFA welcomes the inclusion of operational drainage management, SuDS inspection, water quality monitoring and post-flood inspection commitments. However, confidence in the residual flood risk and water quality conclusions depends on the continued performance of vegetation, soils, drainage features, runoff-management measures and watercourse buffers throughout the operational life of the Scheme. The OEMP identifies mitigation measures but provides limited detail regarding performance monitoring, intervention triggers, adaptive management and long-term review arrangements. Clarification is required regarding: 25. monitoring requirements; 26. performance indicators; 27. intervention thresholds; 28. review procedures; 29. governance arrangements; and	The Applicant notes Wiltshire Council's acknowledgement of the operational drainage management, SuDS inspection, water quality monitoring and post-flood inspection measures contained within the Outline OEMP [REP5-073]. The Applicant has substantively addressed the overarching monitoring, governance, reporting, corrective-action and adaptive management framework in its response to DCO2.1y above and does not repeat that response here. For the operational phase specifically, the relevant controls are provided through the Outline OEMP [REP5-073], Outline SRMP [REP5-077], the relevant landscape and ecological management measures and the drainage inspection and maintenance requirements established through the Flood Risk Assessment and Drainage Strategy suite [REP5-047 to REP5-060]. Operational performance will be assessed against the function of the relevant measure. For drainage infrastructure, indicators requiring intervention may include blockage, damage, erosion, sediment accumulation, reduced conveyance or storage capacity, evidence of uncontrolled discharge or other conditions indicating that the system is not operating

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		30. corrective-action processes.	as intended. For soils and vegetation, relevant indicators include rutting, persistent ponding, sparse or bare ground, vegetation decline, drip-line erosion, rilling, channelisation and other evidence that runoff behaviour may be deteriorating. Where deterioration is identified, proportionate investigation and remedial action will be undertaken through the relevant specialist management plan. The relationship between these operational measures, their monitoring requirements and securing mechanisms is consolidated within Table 3-5: Hydrology, Flood Risk and Drainage of the Mitigation Route Map [REP5-102]. The Applicant therefore considers that the operational management framework provides the monitoring and intervention arrangements necessary to maintain the flood risk, drainage and water quality outcomes relied upon throughout the operational life of the Scheme.
DCO2.1af	All Interested Parties and Statutory Undertakers	•Outline Decommissioning Strategy (Latest Version, Revision 3 [REP3-096]) As per the council's previous comments at Deadline 4, the council considers that further commitments and mitigations are required to be included within this Plan once there	The Outline CEMP [REP5-071] submitted at Deadline 5 confirms that a sustainable procurement process which includes consideration to minimise carbon emissions where feasible will be undertaken as part of supply chain ESG assessments, and points to response to WC1-071 of

ExQ2	Question to:	Question:	Applicant's Response
		was more knowledge about carbon emissions, i.e. from the procurement process for scheme construction and materials. Consideration should also be given to incorporating requirements for GHG emission and carbon reduction plans into the specification and contracts. The council considers that reference to the Innovation Forum should be contained within this Plan in relation to adopting emerging best practices / technological advances in preparation for scheme decommissioning.	The Applicant's Response to Submissions Received at Deadline 4 [REP5-098] The Applicant agrees with the Council that the Innovation Forum be referenced and the Outline Decommissioning Strategy [EN010168/APP/7.14] (Revision 5) has been updated at Deadline 6.
DCO2.1ag	All Interested Parties and Statutory Undertakers	The LLFA notes the improvements made to the Outline Decommissioning Strategy and does not currently seek any specific amendments to the document. Any residual concerns relating to flood risk, drainage, runoff management, soils and monitoring are already captured through the LLFA's comments on the Outline CEMP, OEMP, SRMP and Outline Drainage Strategy.	The Applicant welcomes Wiltshire Council's confirmation that no specific amendments to the Outline Decommissioning Strategy [REP5-075] are currently sought. The residual matters identified are substantively addressed in the Applicant's responses to DCO2.1y and DCO2.1ae above, together with the relevant responses on the Outline SRMP [REP5-077] and Flood Risk Assessment and Drainage Strategy suite [REP5-047 to REP5-060] elsewhere in this document, and are not repeated here.

ExQ2	Question to:	Question:	Applicant's Response
DCO2.1ah	All Interested Parties and Statutory Undertakers	Outline Soil Resources Management Plan (Latest Version, Revision 2 [REP3-098]) The Council notes the amendments to the latest version of the Outline Soil Resources Management Plan (Rev 3) [REP4-054] submitted at Deadline 4, including additional principles for locating soil stockpiles (para. 1.8.22) and the introduction of maximum stockpile parameters (para. 1.8.24). However, significant concerns remain regarding the scale of soil storage required / proposed, the absence of identified stockpile locations, which in the council's view risks subsequent conflict with areas of embedded mitigation, stated Design Principles and Parameters and best practice referenced from within various outline Management Plans. The Council remains concerned that no indicative stockpile locations have been identified within REP4-054 or on any supporting plans. While para. 1.8.22 references good practice measures such as avoiding impacts on trees, watercourses and areas of construction activities, it does not	The Applicant notes this comment. The Outline Soil Resources Management Plan (SRMP) [EN010168/APP/7.15] (Revision 5) has been updated at Deadline 6 to consider spatial constraints and exclusions in relation to the siting of stockpiles. The Applicant maintains that the Scheme design is focused on minimising soil disturbance, however, for areas where soil excavation is necessary, such as for the BESS, substations, and access tracks, the Outline SRMP [REP5-077] establishes maximum parameters, including a 3m height limit for topsoil and 4.5m for subsoil with 1 in 2 side slopes, to ensure potential impacts are fully assessed within a conservative "parameter box". Siting principles are already embedded within the Outline SRMP [REP5-077], including the exclusion of stockpiles from Flood Zone 3b and the requirement to avoid impacts on trees and watercourses. The Applicant considers that defining fixed footprints at this stage is not practicable as dimensions depend on the final detailed design. However, the detailed SRMP, which must be approved by the Local Planning Authority under Requirement 17, would ensure that stockpiles do not conflict with sensitive receptors.

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		adequately address other key environmental constraints, including overland surface water flow routes, embedded mitigation areas, ecological and environmental buffers, consider landscape character or visual amenity effects etc. Given the potential extent of soil stockpiles, the council considers that indicative stockpile locations should be identified on the Works Plans, or alternatively that clear spatial constraints and exclusions should be incorporated within mitigation strategies, or that a requirement for a 'detailed Soil Stockpile Constraints Plan' be prepared to clearly illustrate the land areas which would not be suitable for soil stockpiling, such as on steeper sloping land, flood zones, overland surface water paths, embedded mitigation areas and environmental buffers etc. in order to address all relevant environmental constraints, design principles and best practice referenced to be followed from within Management Plans.	
DCO2.1ai		At the very least the council would wish to see (para. 1.8.22) expanded to list all	Refer to DCO2.1ah response.

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		relevant environmental constraints, and mitigation areas, not just <i>'root- or crown-spread of trees, adjacent to watercourses or in locations where they will be disturbed or contaminated by other construction activities'.</i>	
DCO2.1aj		Wiltshire Council welcomes the revisions made to the Outline SRMP, particularly confirmation that the Plan applies throughout the lifetime of the Scheme, the inclusion of operational monitoring provisions, decommissioning inspections by a suitably qualified soil scientist, and commitments relating to compaction assessment and remediation. The LLFA's remaining concern relates to the role of soil condition as a key hydrological control underpinning the Scheme's flood risk and runoff management strategy. The effectiveness of infiltration, runoff attenuation and erosion resistance is dependent on maintaining soil structure and avoiding compaction. The SRMP establishes good principles, monitoring requirements and remediation measures, but much of the	The Outline SRMP [EN010168/APP/7.15] (Revision 5) has been updated at Deadline 6 at paragraphs 1.8.37 to 1.8.42 to incorporate reference to criteria for identifying unacceptable compaction, intervention triggers, remediation requirements and verification of successful remediation.

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		detailed methodology remains deferred to the future detailed SRMP. In particular, the criteria for identifying unacceptable compaction, intervention triggers, remediation requirements and verification of successful remediation are not yet fully defined.	
DCO2.1ak		Wiltshire Council seeks further clarification within the detailed SRMP framework regarding: 31. soil condition monitoring methodology; 32. criteria for identifying soil compaction and structural degradation; 33. intervention and remediation triggers; 34. verification of remediation effectiveness; and 35. how soil monitoring outcomes will feed into the wider flood risk, drainage and environmental management framework. These matters relate primarily to long-term assurance that the soil functions relied upon	The Outline SRMP [EN010168/APP/7.15] (Revision 5) has been further developed at paragraphs 1.8.37 to 1.8.42 to include clarification on monitoring, criteria for identifying compaction, intervention, and verification of remediation effectiveness, and submitted at Deadline 6.

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		within the Flood Risk Assessment and Drainage Strategy are maintained throughout the lifetime of the Scheme	
DCO2.1a1	All Interested Parties and Statutory Undertakers	36. Outline Site Waste Management Plan (Latest Version, Revision 2 [REP1-102]) 37. Outline Public Rights of Way and Permissive Paths Management Plan (Latest Version, Revision 1 [APP-282]) 38. Outline Landscape and Ecological Management Plan (Latest Version, Revision 2 [REP3-100]) <u>Landscape monitoring and Adaptive management / Visual screening</u> The council notes that while there is general provision to monitor and replace plant failures during early years establishment (years 1-5), there is no provision within the outline LEMP which currently seeks to monitor the effectiveness or success of planting where it is being relied upon to provide long term screening mitigation to	The Applicant refers to its response to DCO2.1ac above.

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		reduce the significance of visual effects assessed at year 15 in the LVIA. The council considers that the content of the outline Landscape and Ecology Management Plan should be revised to incorporate monitoring and adaptive management measures for planting where it is proposed to provide a specific screening function. This would provide greater certainty and incentive to ensure effective visual mitigation outcomes and lowered residual effects are achieved and maintained for the operational life of development. The council considers that regular monitoring intervals for this purpose could be set at 5-10 yearly intervals over the 60-year operational life span of the project. The council considers that monitoring and remedial / adaptive management measures are important to secure to achieve a high degree of certainty that effective mitigation will be delivered, whether that takes the form of specific mitigation to replace direct fabric losses, or to function as effective visual screening relied upon to achieve lower residual	

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		adverse effects for specific receptors, such as Bradfield Manor (Heritage Asset) or Grain Store Barn (residential receptors) and to screen as far as practicable particularly discordant or tall development components such the BESS and the numerous substations. The council has provided alternative wording for Requirement 7 Landscape and Ecological Plan within its comments to the first part of this question for [REP4-100] Draft DCO.	
DCO2.1am	All Interested Parties and Statutory Undertakers	LLFA supports the proposed landscape and ecological measures but considers that the hydrological role of vegetation is not always explicitly recognised. Vegetation is relied upon to support infiltration, runoff attenuation and erosion control. The management framework is largely framed around ecological objectives rather than hydrological performance. The LLFA is seeking greater clarity regarding:	The Applicant notes the LLFA's support for the proposed landscape and ecological measures. The hydrological role of vegetation, including its contribution to maintaining diffuse surface water runoff, limiting erosion and supporting infiltration, is addressed through the combined operation of the relevant landscape, operational and soil-management measures rather than through a separate hydrological vegetation regime. The specific matters raised regarding vegetation condition, bare ground, erosion, intervention and long-term monitoring are substantively addressed in the Applicant's response to DCO2.1ae above and are not

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		39.vegetation monitoring relevant to runoff and erosion control; 40.bare-ground management; 41.erosion remediation; 42.vegetation establishment; and 43.long-term maintenance of hydrological function.	repeated here. In particular, operational monitoring will consider indicators relevant to hydrological performance, including sparse or bare ground, vegetation decline, drip-line erosion, rilling, channelisation and other evidence that runoff behaviour may be deteriorating, with proportionate investigation and remedial action where required. The relationship between vegetation management, soil condition, runoff management and the associated monitoring and securing mechanisms is also identified within Table 3-5: Hydrology, Flood Risk and Drainage of the Mitigation Route Map [REP5-102]. The Applicant therefore considers that the hydrological function of vegetation is appropriately recognised within the secured management framework.
DCO2.1an	All Interested Parties and Statutory Undertakers	•Outline Ecological Protection and Mitigation Strategy (Latest Version, Revision 4 [REP4-055]) •Outline Skills, Supply Chain and Employment Plan (Latest Version, Revision 1 [APP-285]) The council require a comprehensive business compensation scheme to be	The Applicant has provided their reasoning for their objection to the implementation of a bespoke business compensation scheme within its response to question SE2.1 in the Applicant's Response to the Examining Authority's Second Written Questions [REP5-097]. The Applicant does not agree that such a compensation scheme is proportionate to the likely effects the Scheme will have on local business, given

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		included within this Management Plan and / or secured through the DCO. See response to SE2.1 below.	the level of comprehensive mitigation measures secured through the DCO. The Applicant highlights that a statutory compensation framework already exists to address demonstrable economic harm in specific circumstances related to the interference with property rights or as a result of physical factors. Under the Compensation Code, affected parties have legal rights to put forward claims for financial losses if they are directly attributable to the Scheme. The Applicant has confirmed via its Funding Statement [REP5-016] that it possesses sufficient funds to meet all such statutory liabilities in the unlikely event they are required. The Applicant is continuing to engage with Wiltshire Council through the Statement of Common Ground [REP5-087] to understand the extent to which there is not yet agreement on the economic mitigation measures proposed by the Applicant.
DCO2.1ao	All Interested Parties and Statutory Undertakers	Outline Battery Safety Management Plan (Latest Version, Revision 3 [REP3-106]) The council is awaiting the Applicant's agreed updates to this plan to reflect replacement activities and the need to	The Applicant notes this comment was made prior to the publication of responses to Examiners Second Questions and refers to the response to SE2.10 of the Applicant's Response to the Examining Authority's Second Written Questions [REP5-097] which sets

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		consider technological advancements arising from ISH4. The council considers that reference should also be made to the Innovation Forum within this document.	out the appropriate mechanisms for securing the Innovation Forum. The Applicant and Wiltshire Council are in agreement that an Innovation Forum will be provided for however the Applicant considers the Terms of Reference for the Community Liaison Group is the most appropriate place for this to be incorporated. To ensure it could continue to operate when the CLG is not active during the operational phase, it would also be secured through the Outline OEMP [REP5-073] and the Outline Decommissioning Strategy [REP5-075] . For that reason, a separate reference in the Outline BSMP [REP3-106] is not considered necessary. The updates to these management plans have been incorporated at Deadline 6.
DCO2.1ap	All Interested Parties and Statutory Undertakers	Outline Construction Traffic Management Plan (Latest Version, Revision 4 [REP4-057]) The council's highways officers remain concerned regarding the reference to Highway Condition surveys, given the council's preference for a separate S59 Agreement. This would provide a more focuses approach within regards to requirements and ensure that a supporting plan showing the extent of the network which	The Outline CTMP [REP5-083] provides for road traffic condition surveys and rectification of any damage caused by construction traffic. The inclusion of key highway links requested by WC have been included in Section 6.12. The Applicant is therefore bound by Requirement 15 in Schedule 2 to the Draft DCO [REP5-012] to rectify any damage to the highways. The full scope of the areas included will be agreed as part of the Final CTMP which must be substantially in accordance with the Outline CTMP [REP5-083] which will be secured through

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		will need to be covered by pre-, post- and interim condition surveys was provided. The council considers that the condition surveys require more than a video survey in each case too, so plans with photograph locations indicated, photographs and a defects listing including some form of 'grading'. The council also requires a monitoring system to be in place to respond to complaints about HGV routing; and further information is required on how the CTMP Co-ordinator will monitor how their HGVs use the routes. The logging of HGVs entering/leaving the sites is required but also knowledge of the route taken to and from the site. The council continues to seek clarification and certainty regarding the future use of the access track at North Bincombe Wood. The council would like to see the inclusion of wording confirming that: <i>"The access track at North Bincombe Wood shall be used solely for monitoring and</i>	Requirement 15 of Schedule 2 to the Draft DCO [REP5-012]. The Outline CTMP [REP5-083] provides a commitment to a CTMP coordinator and their roles and responsibilities at section 6.14. The final CTMP will provide further details on the monitoring system. Confirmation of the Traffic Management and Monitoring system will be agreed as part of the final CTMP. The preparation, approval and implementation of the final CTMPs, substantially in accordance with the Outline CTMP [REP5-083], are secured through Requirement 15 of Schedule 2 of the Draft DCO [REP5-012]. 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 has provided updated wording in the Outline CEMP [EN010168/APP/7.12] (Revision 7) at Deadline 6.

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		<i>maintenance activities associated with the adjacent hedgerow / vegetation and for no other operational or maintenance purpose."</i> This would provide certainty regarding the scope of future usage and minimise the risk of incremental impacts on adjacent woodland, trees and habitats. Amendments are required to clarify works with respect to Rodbourne Road junction to address the council's built heritage concerns (see response to CH2.9 below).	
DCO2.1aq	All Interested Parties and Statutory Undertakers	The Council notes and welcomes the updates at (Section 6.3 - Specific Highway requirements). This satisfactorily addresses previous Landscape and Visual comments and concerns in relation to avoiding the use of uncharacteristic upstand kerbs and secures replacement of removed hedgerows/drystone walls on existing or adjusted alignments, depending on the planned permanence of necessary 'Highway Improvement Works' or temporary/permanent access requirements,	The Applicant notes this comment.

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		within this rural, high value and sensitive landscape.	
DCO2.1ar	All Interested Parties and Statutory Undertakers	•Outline Archaeological Mitigation Strategy (Latest Version, Revision 1 [APP-230]) Wiltshire Council's Archaeology Service (WCAS) require the Applicant to submit a Detailed Archaeological Mitigation Strategy (DAMS) prior to the conclusion of the examination and definitely prior to a discharging decision being taken. The Applicant feels that this is not necessary and that all aspects of mitigation work will be covered by the Outline Archaeological Mitigation Strategy (OAMS), followed by Site Specific Written Schemes of Investigation (SSWSI) covering individual archaeological sites. WCAS dispute this view and have repeated the request for a DAMS. At this stage, the two parties remain in dispute with regards to this matter.	The AMS has been drafted with consideration to the indicative Scheme design submitted with the DCO application for the Scheme. It should be noted that the detailed Scheme design will be developed post consent of the DCO Application, and that without a detailed design it is not possible to produce a Detailed Archaeological Mitigation Strategy (DAMS). The Applicant highlights an AMS is a standard document that is submitted as part of Solar DCO Schemes, as evidence by the consented Cottam, West Burton and East Yorkshire Solar Park Schemes. Where a DAMS has been produced to support a DCO Application, this is typically on developments where a detailed design is submitted with the DCO Application (i.e. road schemes). Site Specific Written Schemes of Investigations (SSWSIs) that detail site-specific mitigation measures will be appended to the AMS in advance of each phase of mitigation works. It is intended that these SSWSIs will include the 'detailed' level information required by WCAS for example including the approach to mitigation for individual sites with consideration to the final design, programme of archaeological

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			investigation for on-site and off-site work (including analysis, publishing and archiving of the results) as well as public engagement plans. The SSWSIs will be approved by Wiltshire Council prior to their implementation. As such the Applicant does not consider a DAMs to be required as part of the documentation needed to ensure the appropriate mitigation of archaeological remains.
DCO2.1as	All Interested Parties and Statutory Undertakers	Outline Drainage Strategy (Latest Version, Revision 4, [REP4-021, REP4-023, REP4-025, REP4-027, REP4-029, REP4-031, REP4-033, REP4-035]) The LLFA broadly accepts the drainage strategy, flood risk assessment and drainage philosophy. The remaining concern relates to how the drainage strategy is translated into long-term management and assurance arrangements. Drainage, soil, vegetation and runoff-management controls remain distributed across multiple documents and their interrelationship is not always clearly explained. The LLFA is seeking a clearer explanation of:	The Applicant welcomes the LLFA's broad acceptance of the drainage strategy, flood risk assessment and drainage philosophy. The matters raised regarding document interrelationships, monitoring, maintenance, governance, performance review and adaptive management are substantively addressed in the Applicant's responses to DCO2.1y and DCO2.1ae above and are not repeated here. The Mitigation Route Map [REP5-102], in particular Table 3-5: Hydrology, Flood Risk and Drainage, provides the consolidated audit trail between the mitigation relied upon in the Flood Risk Assessment and Drainage Strategy suite [REP5-047 to REP5-060], the associated soil, vegetation and operational

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		44. document interrelationships; 45. monitoring arrangements; 46. maintenance responsibilities; 47. performance review; 48. governance processes; and 49. adaptive management procedures.	management measures, their monitoring requirements and the mechanisms by which they are secured. The Applicant therefore considers that the relationship between the drainage strategy and the long-term management and assurance framework is clearly established.
DCO2.1at	All Interested Parties and Statutory Undertakers	Outline Water Resources Strategy (Latest Version, Revision 1 [APP-290]) The Council highlights that there is no consideration of necessary watering requirements for early years establishment and maintenance of the proposed tree and hedgerow planting included within the strategy. The council highlights this would be a typical contractual clause requirement included within landscape planting and early years landscape maintenance / management contracts. Given the quantities of tree and hedgerow planting proposed, this could result in a requirement for substantial volumes of water during early years establishment and	The Applicant notes Wiltshire Council's comments regarding both the allowance for establishment watering within the Outline Water Resources Strategy [APP-290] and the separate LLFA request for clarification regarding groundwater monitoring within Source Protection Zones. The Applicant agrees that watering may be required to support the successful establishment of new tree and hedgerow planting, particularly during the early establishment period and during prolonged dry weather. The Applicant has previously confirmed that watering, replacement planting and aftercare are principally matters for the detailed Landscape and Ecological Management Plan, which will be prepared substantially in accordance with the Outline LEMP [REP5-079] and secured through Requirement 7 of the

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		maintenance/management including for prolonged periods of seasonal drought. It is the council's view that necessary water resources should be considered and added at 'Section 3 – Scheme Water Demand' for early years landscape planting establishment and maintenance if the proposed new tree and hedgerow planting is to stand any chance of successfully establishing. Wiltshire Council broadly accepts the conclusions of the Outline Water Resources Strategy and agrees that the Applicant has demonstrated the availability of feasible water supply options for both the construction and operational phases of the Scheme. From an LLFA perspective, the remaining issue relates to the circumstances in which groundwater monitoring may be required within Source Protection Zones and the arrangements that would apply should potential groundwater impacts be identified during construction or operation. While the Strategy identifies potential water sources and demonstrates supply feasibility, it	Draft DCO [REP5-012]. The Outline LEMP [REP5-079] provides the framework for the successful establishment, monitoring and future management of the proposed landscape works, with the detailed requirements necessarily dependent upon the final planting specification, planting programme, prevailing weather conditions and observed establishment performance. The Applicant accepts that establishment watering nevertheless represents a foreseeable water demand which should be considered alongside the other demands identified in the Outline Water Resources Strategy [APP-290]. It is not considered appropriate to assign a fixed volume at this stage because the actual requirement will vary materially according to the final planting quantities, species and stock sizes, timing of planting, antecedent rainfall, soil moisture conditions and the occurrence or duration of drought conditions. The relevant water requirement will therefore be determined through the detailed LEMP and incorporated into the Scheme's detailed water-supply planning once those variables are known. The strategic availability of water supply has already been demonstrated. As confirmed in the Applicant's response to FHW1.16, Bristol Water identified an

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		provides limited information regarding monitoring triggers, reporting arrangements, intervention thresholds and corrective-action procedures associated with groundwater protection. The LLFA is seeking clarification of: 50. criteria and triggers for groundwater monitoring within Source Protection Zones; 51. monitoring parameters and reporting arrangements; 52. intervention thresholds; and 53. corrective-action procedures where impacts are identified.	available connection to an existing water main close to Lime Down A with a potential flow of approximately 7 m³/hour, sufficient for the conservative peak construction demand of approximately 169 m³/day assessed within the Outline Water Resources Strategy [APP-290]. The secured management framework also allows tankered water supply to be used where required as a contingency. No abstraction from local surface watercourses or groundwater is proposed to meet Scheme water demands. The Applicant therefore considers that there is a demonstrated and flexible supply pathway for establishment watering without reliance upon sensitive local water resources. In relation to the separate groundwater-monitoring point, the Applicant does not consider that the presence of a Source Protection Zone alone should trigger a uniform groundwater-monitoring regime. The appropriate trigger is whether the proposed activity has the potential to encounter, affect or create a pathway to groundwater or a sensitive controlled-waters receptor. The Outline CEMP [REP5-071] requires intrusive ground investigation, as appropriate, to characterise soil and groundwater conditions across the full extent

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			of the Order Limits prior to construction. Where previously unidentified groundwater risks emerge, a detailed Hydrogeological Risk Assessment will be undertaken in consultation with the Environment Agency. The Environment Agency and Applicant have also agreed that, where pre-construction investigation identifies shallow groundwater, or where groundwater could materially affect cable installation, trench stability, dewatering requirements or controlled-waters receptors, groundwater observation and monitoring will be undertaken on a risk-based basis with reference to BS 5930. The monitoring specification will consequently be informed by the pre-construction investigation and the activity concerned. This will enable appropriate monitoring locations, parameters, frequencies and trigger levels to be established having regard to baseline groundwater conditions, natural and seasonal variability, receptor sensitivity and the proposed construction methodology. Where monitoring identifies a material change from baseline conditions or evidence of an adverse effect attributable to the works, this will trigger investigation and proportionate corrective action, including amendment or cessation of the relevant activity where necessary, modification of dewatering or construction methodology, additional

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			pollution-control measures and further monitoring to demonstrate that the issue has been resolved. These arrangements sit within the wider monitoring, reporting, escalation and corrective-action framework described in the Applicant's response to DCO2.1y above and are not repeated here. The Applicant has also confirmed elsewhere in this document that the commitment to pre-construction ground investigation and associated groundwater monitoring will be included within the Commitments Register and that the Environment Agency and Wiltshire Council will be consulted on the ground investigation and monitoring specification. Routine operation of the Scheme does not involve abstraction from groundwater or the same intrusive activities that give rise to the principal construction-phase groundwater risks. Routine groundwater monitoring throughout the operational phase is therefore not considered proportionate solely because parts of the Scheme lie within Source Protection Zones. Where operational maintenance or replacement activities introduce a specific potential interaction with groundwater, the relevant groundwater-protection and pollution-control measures

ExQ2	Question to:	Question:	Applicant's Response
			will be applied on a risk-based basis through the operational management framework. The Applicant therefore considers that both matters raised by Wiltshire Council are appropriately addressed: establishment watering will be accommodated through the detailed landscape establishment requirements and the viable water-supply hierarchy already demonstrated by the Outline Water Resources Strategy [APP-290], while groundwater monitoring will be targeted to those locations and activities where pre-construction investigation identifies a credible groundwater interaction or controlled-waters risk. The criteria associated with groundwater monitoring has yet to be formally defined, but a monitoring programme will be designed in line with best practice considering the Environment Agency guidance resource Groundwater protection technical guidance - GOV.UK and the Wiltshire Council document Wiltshire Council Drainage Policy – Groundwater Monitoring. A baseline of groundwater conditions will be obtained prior to the commencement of construction, with a programme of regular monitoring events then secured considering the sensitivity of specific locations, seasonality and hydrogeology. Intervention will be

ExQ2	Question to:	Question:	Applicant's Response
			driven by observed variation in the baseline. Any variation will be rationalised against seasonal and hydrogeological conditions and where variation is identified, interventions will be designed. The Applicant outlines measures that will applied to mitigate potential impacts in the Outline CEMP [REP5-071] .
Articles			
DCO2.7	The Applicant Wiltshire Council	Article 16 – Traffic regulation measures Q1 Article 16 was discussed at ISH4 in relation to whether the notice timeframes in 16(5) for carrying out any of the traffic regulation measures permitted by this Article are sufficient. As part of that discussion the applicant emphasised that the traffic regulation measures sought (such as signs or signals) have to be approved as part of the CTMP, which would occur before the notification required by 16(5). The ExA has reviewed the oCTMP and notes that paragraph 2.4.1 states: <i>Details of the form and proposed locations of any signs or signals to be placed on a public highway will be submitted to Wiltshire</i>	The Applicant refers Wiltshire Council to its response given to DCO2.7 in the Applicant's Response to the Examining Authority's Second Written Questions [REP5-097] .

ExQ2	Question to:	Question:	Applicant's Response
		<i>Council and South Gloucestershire Council in advance of being placed (either as part of the CTMP or separately).</i> In addition, paragraph 4.5.1 states: <i>Temporary road signage will be implemented along the designated routes to inform background traffic of the ongoing construction works and to direct construction traffic to and from the Site. The signs will be located at key points along the route, including junctions.</i> Neither of these paragraphs require the details of signs or signals to be approved as part of the CTMP. Furthermore, the traffic regulation measures included in Article 16 are much broader and include for example, restricting the stopping, waiting, loading or unloading of vehicles on any road, or the use of any road by vehicular or non-vehicular traffic. None of these measures are seemingly captured as matters in the oCTMP that require advance approval by the traffic authority before the powers in Article 16 can be used. The ExA notes that paragraph (4) does require the applicant to	

ExQ2	Question to:	Question:	Applicant's Response
		obtain the written consent of the traffic authority, which suggests that the actual detail of the traffic regulation measures sought will be through the consent process outlined in Article 47 and not through the CTMP approval process (and the Schedule 16 discharge provisions). This was touched upon in ISH4 and the applicant agreed that in theory it could apply for consent under Article 16 and the process outlined in Article 47 would apply, although it added that it could still not carry out the works because they would have to be approved under the CTMP. As highlighted above, the latter does not seem to be the case. In which case, a consent sought under Article 16 would only give the traffic authority 6 weeks to approve the detail (pursuant to Article 47) or else it would receive deemed consent. Thus, in order to pin this down and remove any potential confusion, the ExA would welcome a response from the applicant and Wiltshire	

ExQ2	Question to:	Question:	Applicant's Response
		Council on whether paragraph (4) should say something along the lines of: <i>(4) Before exercising the power conferred by paragraph (1) the undertaker must—</i> <i>(a) consult with the chief officer of police in whose area the road is situated; and</i> <i>(b) obtain the written consent of the traffic authority as part of the construction traffic management plan in Schedule 2, Requirement 15.</i> Wiltshire Council fully supports the ExA's suggested inclusion so that Article 16 (4)(b) included the proposed drafting, namely "as part of the construction traffic management plan in Schedule 2, Requirement 15". The council considers that this would provide the necessary clarity.	
DCO2.8a	Wiltshire Council	Article 16 – Traffic regulation measures Q2 In its post hearing submission [REP4-092] the Council maintains that the notice timeframes contained in Article 16(5) do not enable the national standard	The Applicant refers Wiltshire Council to its response given at WC-147 in the Applicant's Response to Submissions Received at Deadline 4 [REP5-098]. As set out there, the 4-week period in Article 16(5)(a) is the period for notification of the approval of the relevant traffic regulation measure, and not the period

ExQ2	Question to:	Question:	Applicant's Response
		practice to be adhered to. It adds that the Council is prepared to reduce the timeframe in sub-paragraph (5)(a) from 12 weeks to 8 weeks but would not be able to comply with 4 weeks and still fulfil its statutory duties. Can the Council please explain, signposting the ExA to the relevant piece of legislation, which statutory provision would be breached if the notice period were to remain at 4 weeks? There are two pieces of regulation that make most highways authorities stipulate the 12-week time frame for the making of a TTRO: 1) The Department for Transport <u>Permit schemes: statutory guidance for highway authorities</u>, whereby: 54. Section 3.19 sets out that planned works with a TTRO requirement are a Major Permit; 55. Section 3.20 sets out that a Provisional Advances Authorisation (PAA) is required for a Major activity permit;	for the approval itself. The approval of traffic regulation measures occurs through the approval of the CTMP via Requirement 15 of the Draft DCO [REP5-012], which provides for a 10-week approval period. The Applicant therefore maintains that the 4 week notification period is appropriate, given that the substantive approval of any traffic regulation measure will have already been secured under the CTMP process through Requirement 15 before the notification under Article 16(5) is served. As set out in the Applicant's response to ExQ2 DCO2.7 in the Applicant's Response to the Examining Authority's Second Written Questions [REP5-097], all traffic regulation measures exercised under Article 16 must first be approved through the CTMP process under Requirement 15. A traffic regulation measure that had not been approved through the CTMP would be a breach of Requirement 15(4), which requires that works be carried out in accordance with the approved CTMP. The 4 week notification period in Article 16(5) therefore operates after the substantive approval of the measure has already taken place, and the Council's concerns about the lead-in time required for the making of a TTRO do not therefore arise in the way the Council suggests.

ExQ2	Question to:	Question:	Applicant's Response
		56. Section 3.34 sets out the requirement for the TTRO applications in the usual time frames of the authority – 12 weeks in most authorities including Wiltshire Council; and 57. Section 3.70 has a table that sets out the time frame for different permit types. As stated, permits with a TTRO are a Major Permit and therefore a minimum of 3 months (12 week) lead in is required – please note, and the council stress that this is the “minimum” time frames.	The Applicant therefore maintains that no amendment to the 4 week notification period in Article 16(5)(a) is necessary, and the Draft DCO [REP5-012] does not require revision on this point.
DCO2.8b	Wiltshire Council	2) The Department for Transport Statutory guidance <u>Co-ordinating street works</u> This Code of Practice sets out the rules to allow Traffic Authorities to discharge their Network Management Duties (Section 16 of the Traffic Management Act 2004) – as Traffic Authorities have a duty to coordinate works on the highway. It also sets out how undertakers cooperate in the process.	The Applicant refers Wiltshire Council to its response given above at DCO2.8a.

ExQ2	Question to:	Question:	Applicant's Response
		Section 12.2.3 states that “when a TTRO is require for a planned work, at least 3 months’ notice to the authority is required”. It sets out that authorities need all the information with the application to allow for time to consult, obtain approvals, publicise the order as well as allowing time to inform public transport providers. Although it is not mentioned explicitly in this document, the TTRO consultation process also includes statutory stakeholders that includes the blue light services. It also means the authority can liaise with neighbouring authorities who will be affected by the closure and diversion and get their permission if the diversion uses their network.	
DCO2.8c	Wiltshire Council	Furthermore, the council notes that it appears in Clause 146 of the proposed Protective Provisions for the benefit of the Local Highway Authority, the undertaker would give the council not less than 56 days’ notice of an opening on the highway, which seems at odds with the proposed 6-week	The two provisions noted operate in different contexts: Article 16(5)(a) provides the minimum notice period that must be given to the chief officer of police and to the traffic authority before the undertaker exercises its powers to make temporary traffic regulation measures during the construction, maintenance or decommissioning of the authorised development, whereas paragraph 146 of Part 11 of Schedule 15, requires the undertaker to notify the local highway

ExQ2	Question to:	Question:	Applicant's Response
		notification for a closure, as this would be more disruptive than an opening.	authority not less than 56 days in advance of the intended date of opening to the public of the local road network — a post-construction completion provision triggered following the completion of road works or prior to the reopening of any part of the local road network following any closure or partial closure, and not a provision governing temporary traffic management during construction. No revision to Article 16(5)(a) or to paragraph 146 of Schedule 15 is therefore required.
DCO2.8d	Wiltshire Council	The council would also like to take the opportunity to re-iterate that all other works promoters in Wiltshire are managing their programme of works around the requirement for a 12-week lead in period in order for the legal process to be achieved.	The Applicant notes this comment.
DCO2.9	The Applicant	Article 16 – Traffic regulation measures Q3 At ISH4 Stop Lime Down suggested the insertion of an addition of a new sub-paragraph (c) to paragraph (5), which would require the applicant to display	The Applicant refers Wiltshire Council to its response given to DCO2.9 in the Applicant's Response to the Examining Authority's Second Written Questions [REP5-097] .

ExQ2	Question to:	Question:	Applicant's Response
		a site notice containing the traffic regulation measures on the roads affected as part of the notice period process. Stop Lime Down referred to The Springwell Solar Farm Order 2026, and transposing that provision into the Lime Down dDCO it would be drafted as follows: <i>(5) The undertaker must not exercise the powers in paragraphs (1) or (2) unless it has—</i> <i>(a) given not less than 4 weeks' notice in writing of its intention so to do to the chief officer of police and to the traffic authority in whose area the road is situated;</i> <i>(b) not less than 7 days before the provision is to take effect published the undertaker's intention to make the provision in one or more newspaper circulating in the area in which any road to which the provision relates is situated; and</i> <i>(c) displayed a site notice containing the same information at each end of the length of road affected.</i>	

ExQ2	Question to:	Question:	Applicant's Response
		The applicant is requested to apply the insertion of sub-paragraph (c) in its next revision of the dDCO or explain why it is not necessary. Stop Lime Down also requested whether a greater level of detail should be inserted into the oCTMP (if indeed the traffic regulation measures are approved as part of the CTMP, discussed in ExQ2 DCO2.7) around whether traffic regulation approvals should identify the duration of the measures being approved so as to avoid traffic disruptions for any longer than necessary. The applicant committed to exploring possible drafting on that matter, but nothing was submitted at deadline 4. The ExA requests a response on this matter at deadline 5. Whilst the council acknowledges that this question was directed to the Applicant, Wiltshire Council agrees that 'displaying a site notice containing the same information at each end of the length of road affected' is set out in the Road Traffic (Temporary Restrictions) Procedure Regulations 1992. However, Regulation 3 makes a site notice	

ExQ2	Question to:	Question:	Applicant's Response
		discretionary though, although the council would be within its rights to ask for them if it was considered necessary to provide adequate publicity.	
DCO2.11a	Stop Lime Down The Applicant Wiltshire Council	Article 40 – Felling or lopping of trees and removal of hedgerows Q2 Stop Lime Down has suggested [REP3-173 and REP4-132] that the word 'only' should be inserted after the word 'remove' in Article 40(4), such that it would say: <i>(4) The undertaker may, for the purposes of the authorised development or in connection with the authorised development and subject to paragraph</i> <i>(2), remove only the hedgerows specified in the table in Part 1 and the table in Part 2 of Schedule 12 (hedgerows to be removed) to the extent set</i> <i>out in the ecological protection and mitigation strategy approved pursuant to requirement 8 in Schedule 2 (requirements).</i>	The Applicant notes this comment relating to wording of Article 40 and refers Wiltshire Council to its response given to DCO2.11 in the Applicant's Response to the Examining Authority's Second Written Questions [REP5-097] .

ExQ2	Question to:	Question:	Applicant's Response
		Stop Lime Down: 1) Stop Lime Down are requested to explain the necessity for this insertion. The Applicant and Wiltshire Council: 2) The applicant and Wiltshire Council are invited to comment on the implications (if any) of this suggested insertion. Wiltshire Council does not raise any objection to Stop Lime Down's (SLD) suggestion. However, as the table in Part 1 and Part 2 of Schedule 12 (hedgerows to be removed) appears to list the full length of every hedgerow which could potentially be removed, the council considers that it may not necessarily confer the benefits that SLD are envisaging. The council would suggest that the word "only" is relocated in the sentence, so that it would state: "(4) The undertaker may, for the purposes of the authorised development or in connection with the authorised development and subject to paragraph (2), remove the hedgerows specific in the table in Part 1 and the table in Part 2 of Schedule 12 (hedgerows to be	

ExQ2	Question to:	Question:	Applicant's Response
		removed) only to the extent set out in the ecological protection and mitigation strategy approved pursuant to requirement 8 in Schedule 2 (requirements)."	
DCO2.11b	Stop Lime Down The Applicant Wiltshire Council	Furthermore, in accordance with Wiltshire Council's consistently raised concern (most recently in the council's Post Hearing Submissions [REP4-092] and in comments on the Deadline 4 submissions to be submitted at Deadline 5), regarding the overly wide powers afforded by the scope of Schedule 12 and the inclusion of all hedgerows across the Order Limits, the council reiterates that it considers in the interests of precision, enforceability and avoiding uncertainty, the specific lengths of hedgerow authorised for removal should be stated within Schedule 12, thereby replacing the generic term "part" with a quantified measurement (metres) corresponding to the approved plans.	The Applicant refers Wiltshire Council to its response to DCO2.10 in the Applicant's Response to the Examining Authority's Second Written Questions [REP5-097] .
DCO2.11c	Stop Lime Down The Applicant	The stated measurements should, at the very least, specify the minimum and maximum extent of hedgerow that may need to be removed from each of the hedgerows	The Applicant refers Wiltshire Council to its responses given above at DCO2.11a and DCO2.11b.

ExQ2	Question to:	Question:	Applicant's Response
	Wiltshire Council	listed. However, the stated measures should not be interpreted as a requirement to remove the full permissible length. Where detailed design, construction requirements, or site circumstances allow, the Applicant should seek to minimise impact 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. This would ensure continuity across the DCO documents, notably in this regard, the dDCO Schedule 12, the EPMS and Hedgerow Removal Plans contained therein at Annex A, and the HRA, and would provide greater certainty and assurance of the imposition of the restrictions set out in the EPMS and as cited in Article 40(4) and the footnotes in Schedule 12.	

ExQ2	Question to:	Question:	Applicant's Response
DCO2.12a	Wiltshire Council	Article 41 – Trees subject to tree preservation orders Further to the discussion about this Article at ISH4, the applicant has included new notice provisions in paragraph (4) as follows: <i>(4) Notice in writing of the proposed activities authorised by paragraph (1)(b) must be given to the relevant planning authority—</i> <i>(a) in the case of activities urgently necessary to remove an immediate risk of serious harm, as soon as practicable after the activities become necessary; and</i> <i>(b) in any other case at least five working days prior to the date on which the activities are to be commenced.</i> The Council is asked to advise if a five working day notice period in sub-paragraph (b) is reasonable. If not, explain why not and provide justification for any longer notice period sought. Wiltshire Council Arboricultural Officers are satisfied that the proposed five working day	The Applicant has considered Wiltshire Council's request regarding the extension of the five working day notification period to trees within Conservation Areas. Rather than amending Article 41, the Applicant has introduced an additional operational commitment within the Outline OEMP [EN010168/APP/7.13] (Revision 6). This requires the Undertaker to provide Wiltshire Council with not less than five working days' written notice where, during operation of the authorised development, it is determined that the felling or removal of a retained Category A or Category B tree, or a retained veteran or ancient tree, is reasonably necessary due to disease, structural condition, safety considerations or operational requirements associated with the authorised development. The commitment also makes appropriate provision for urgent works where a tree presents an immediate risk of serious harm to persons or property, in which case prior notification would not be required and Wiltshire Council would instead be notified in writing as soon as reasonably practicable following completion of the works. The Applicant considers that this provides an appropriate and proportionate mechanism for ensuring

ExQ2	Question to:	Question:	Applicant's Response
		notice period set out in paragraph 4(b) is reasonable in relation to trees protected by Tree Preservation Orders. 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.	that Wiltshire Council is notified in advance of works to the retained trees of greatest arboricultural value and sensitivity during operation, including where such trees are located within a Conservation Area. The Applicant therefore does not consider that a separate amendment to Article 41 to capture all trees subject to Section 211 notification requirements is necessary. The revised commitment is included within the Outline OEMP [EN010168/APP/7.13] (Revision 6) submitted at Deadline 6.
DCO2.12b	Wiltshire Council	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.	The Applicant refers Wiltshire Council to its response to DCO2.12a

ExQ2	Question to:	Question:	Applicant's Response
		Subject to the above recommendation regarding Conservation Area trees, the council has no objection to the proposed notice provisions contained within Article 41.	
DCO2.14	The Applicant	Article 50 – Maintenance of drainage works The ExA has been unable to find any other example of Article 50 being included in any other made solar DCO. The ExA seeks to understand the necessity for including this Article in the dDCO, for while the Explanatory Memorandum notes that an identical article has been included in three transport DCOs, that is not an explanation for its necessity in the Lime Down Solar Project Order. On the basis that there is no precedent in other made solar Orders or indeed evidence to demonstrate that its purpose was properly examined, the applicant needs to fully justify why this Article, which appears to have only	The Applicant refers Wiltshire Council to its response given to DCO2.14 in the Applicant's Response to the Examining Authority's Second Written Questions [REP5-097]. The Applicant notes and welcomes Wiltshire Council's support for the retention of Article 50. Article 50 is a limited clarificatory provision. It does not impose any new drainage maintenance obligation upon the Applicant, confer additional powers or create an additional approval process. Its purpose is simply to confirm that the construction, operation, maintenance or decommissioning of the Scheme does not, of itself, alter any existing responsibility for the maintenance of works connected with the drainage of land, unless the Applicant and the person responsible agree otherwise in writing. This is relevant to the Scheme because the Order Limits extend across a substantial area of

ExQ2	Question to:	Question:	Applicant's Response
		been used in transport DCOs, is specifically required and should remain in the Lime Down Solar Project dDCO. Whilst it is acknowledged that this question was posed to the Applicant, the Lead Local Flood Authority (LLFA) supports the retention of Article 50 and considers that it serves an important and proportionate function within the draft Order. The purpose of Article 50 is not to create new powers, alter statutory responsibilities, or confer any additional rights on the undertaker. Rather, it provides legal certainty that the grant and exercise of powers under the Order do not inadvertently affect existing responsibilities for the maintenance of drainage works unless expressly agreed in writing by the relevant parties. The authorised development includes extensive drainage infrastructure and works associated with drainage, including sustainable drainage systems, attenuation features, drainage networks, outfalls, culverts and works affecting existing	predominantly agricultural land containing existing land drains, ditches, Ordinary Watercourses and other drainage infrastructure. The construction of the authorised development may require works which cross, interact with or, in some cases, alter existing drainage features. Article 50 provides certainty that such interaction does not inadvertently transfer an existing maintenance liability to or from the Applicant. The provision is therefore protective of the existing allocation of responsibility rather than an additional environmental obligation. Where a different maintenance arrangement is appropriate, Article 50 expressly allows this to be agreed in writing between the relevant parties. This rationale is set out in the Explanatory Memorandum [REP5-014], paragraph 4.6.26, which explains that the provision provides certainty to both the Applicant and those with existing drainage maintenance responsibilities. The Applicant therefore considers that Article 50 remains a proportionate provision.

ExQ2	Question to:	Question:	Applicant's Response
		drainage systems and watercourses. The Order also contains powers relating to water discharge, street works, highway alterations, compulsory acquisition, temporary possession and the disapplication of certain Land Drainage Act controls. These powers have the potential to interact directly with existing drainage assets and the parties responsible for their maintenance. The LLFA considers that Article 50 provides an important safeguard because it expressly preserves the existing allocation of drainage maintenance responsibilities. Without such a provision, uncertainty could arise over whether the exercise of powers under the Order, or the construction and operation of drainage infrastructure authorised by the Order, has altered responsibility for the maintenance of existing or newly affected drainage assets. Although the LLFA does not suggest that such a transfer of responsibility would necessarily occur, Article 50 removes ambiguity and reduces the potential for future disputes between the undertaker,	

ExQ2	Question to:	Question:	Applicant's Response
		landowners, riparian owners, highway authorities and drainage authorities. The LLFA does not consider that the protective provisions for drainage authorities elsewhere in the Order remove the need for Article 50. The protective provisions in Schedule 15 are primarily concerned with approvals, access arrangements, remediation obligations, cost recovery and the protection of drainage interests. They do not expressly confirm that responsibility for maintaining drainage assets remains with the party otherwise responsible for those assets. Article 50 therefore performs a distinct and complementary function by preserving the status quo in relation to maintenance liabilities. The LLFA further considers that Article 50 provides assurance that the implementation of the authorised development cannot be interpreted as transferring maintenance liabilities to a drainage authority where no such transfer has been expressly agreed. This is particularly relevant for a project of this scale, which extends across a large	

ExQ2	Question to:	Question:	Applicant's Response
		geographical area and interacts with numerous existing drainage assets, ordinary watercourses, ditches, culverts and drainage systems. The provision therefore provides certainty not only for the undertaker but also for drainage authorities, affected landowners and other parties with responsibilities for drainage infrastructure. Whilst it is acknowledged that comparable provisions do not routinely appear in made solar DCOs, DCO provisions should be assessed on the basis of the circumstances and requirements of the individual project rather than precedent alone. In this instance, the extensive drainage works authorised by the Order and the wide-ranging powers sought increase the potential for uncertainty regarding future maintenance responsibilities . Article 50 addresses that risk directly by expressly confirming that existing maintenance liabilities are neither transferred nor extinguished by the Order. Accordingly, the LLFA considers that Article 50 is a necessary clarificatory provision	

ExQ2	Question to:	Question:	Applicant's Response
		which preserves existing drainage maintenance responsibilities, avoids uncertainty regarding future liabilities, and complements the wider drainage protections contained within the draft Order. For those reasons, the LLFA supports its retention within the Lime Down Solar Project DCO. The council also wishes to highlight that the Applicant has included Article 50 at the direct request of the council. As illustrated within the council's Relevant Representation, the council had originally requested: "In Part, 4, Supplemental Powers, the Applicant should consider the inclusion of Maintenance of drainage work", which was accepted by the Applicant. Therefore, the council's submission regardless of relevant solar DCO precedent is that this something that the Applicant has freely accepted to undertake on the initial request by the Local Authority.	
Schedule 15 – Protected Provisions			
DCO2.23a	All Statutory Undertakers	Status and Proposed Revisions As per the examination timetable, all Statutory Undertakers and Wiltshire Council are requested to submit their proposed	The Applicant welcomes Wiltshire Council's confirmation that the amendment to Article 17 has resolved the issue previously raised regarding its interaction with Part 9 of Schedule 15, and that the

ExQ2	Question to:	Question:	Applicant's Response
	Wiltshire Council	version of protective provisions that they wish to see included for their benefit in the dDCO but have not been agreed by the applicant. Please also set out why you are not content with the applicant's version in Schedule 15 of Revision 4 of the dDCO [REP4-004], and explain why the ExA and Secretary of State should prefer your suggested drafting. Wiltshire Council LLFA notes that the Applicant's amendment to Article 17 has resolved the specific issue identified in response to ExQ1 FHW2.13 regarding the interaction between Article 17 and Part 9 of Schedule 15. Accordingly, the LLFA is not seeking further amendments to Article 17 or alternative drafting of the protective provisions. However, the LLFA continues to seek assurance that the final DCO framework retains appropriate consultation, approval and oversight mechanisms in relation to drainage, water environment, soil management, construction runoff management, vegetation management,	LLFA is not seeking further amendments to Article 17 or alternative drafting of the Protective Provisions. The Applicant also notes the LLFA's request for assurance regarding the wider implementation and management framework. The Applicant considers that this assurance is already provided through the Draft DCO [REP5-012], the certified outline management plans and the Mitigation Route Map [REP5-102]. The Route Map, in particular Table 3-5: Hydrology, Flood Risk and Drainage, identifies the mitigation relied upon, associated monitoring requirements and the mechanism through which each measure is secured. The construction-phase arrangements, including temporary drainage, runoff and sediment control, monitoring, inspection, reporting, corrective action and management of interfaces between different parts of the Scheme, are addressed comprehensively in the Applicant's response to DCO2.1y above and are not repeated here. The corresponding operational arrangements for drainage, soils, vegetation and associated monitoring and intervention are addressed in the Applicant's response to DCO2.1ae above. The Applicant agrees that the final DCO package should retain appropriate mechanisms for consultation with, and where required approval by, the relevant

ExQ2	Question to:	Question:	Applicant's Response
		monitoring and associated management plans which support the Council's statutory functions as Lead Local Flood Authority. In particular, the LLFA considers it important that the DCO and associated management plan framework continue to provide the necessary mechanisms for LLFA involvement in matters relating to: 58.flood risk management; 59.surface water drainage; 60.runoff, erosion and sediment management; 61.ordinary watercourses and associated drainage assets; 62.soil condition, soil structure and compaction management; 63.vegetation management where it contributes to hydrological performance, runoff attenuation, erosion control and water quality protection;	authority in relation to matters falling within its statutory functions. The Applicant does not, however, consider that this requires the LLFA to be given a separate approval or consultation role in respect of every management measure which may have an indirect relationship with hydrological performance. Soil, vegetation, ecological and landscape measures remain subject to the specialist management plans and approval arrangements appropriate to those matters, while their relationship with flood risk and drainage is identified through the Mitigation Route Map [REP5-102]. For matters directly engaging the LLFA's flood risk and drainage functions, the Draft DCO [REP5-012] retains the relevant mechanisms, including the drainage requirements, Article 17 and Part 9 of Schedule 15. The Applicant therefore considers that the combination of the Draft DCO [REP5-012], certified outline management plans and Mitigation Route Map [REP5-102] provides an appropriate and proportionate framework for implementation, monitoring, maintenance, review and corrective action without requiring further amendments to Article 17 or Part 9 of Schedule 15.

ExQ2	Question to:	Question:	Applicant's Response
		64. monitoring, inspection and maintenance; 65. performance review and reporting; 66. corrective action; and 67. adaptive management throughout the lifetime of the Scheme. The LLFA's position should therefore not be interpreted as seeking additional amendments to Article 17 or competing drafting of Part 9 of Schedule 15. Rather, the LLFA seeks confirmation that the final DCO package retains the necessary enabling mechanisms to support the discharge of the council's statutory flood risk and drainage management functions, and the implementation, monitoring, maintenance, review and long-term management of the measures relied upon within the Flood Risk Assessment, Drainage Strategy and associated management plans.	
DCO2.23b	All Statutory Undertakers	With respect to the Protective Provisions for the Benefit of the Local Highway Authority discussions with the Applicant are ongoing. The council will	The Applicant notes this comment and welcomes ongoing engagement with Wiltshire Council in respect

ExQ2	Question to:	Question:	Applicant's Response
	Wiltshire Council	provide its response to this question along with its preferred Protective Provisions at Deadline 6.	of Protective Provisions for the benefit of the local highway authority. The Applicant received Wiltshire Council's latest comments on the Protective Provisions on 11 August 2026. The Applicant has been in the process of reviewing these and negotiations are progressing well. The Applicant has included its preferred version of the Protective Provisions at Deadline 6 within the Draft DCO [EN010168/APP/3.1] (Revision 6). The Applicant will provide its detailed response to Wiltshire Council's latest comments on the draft Protective Provisions shortly following Deadline 6.
DCO2.24	The Applicant Wiltshire Council	Protected Provisions for The Local Highway Authority The ExA acknowledges the submission of draft protected provisions for the local highway authority from the applicant [REP4-004] and Wiltshire Council [REP4-092]. From a review of the drafts, the ExA notes for example (but not least) that the definition of “the bond sum” and “the commuted sum” are different between the two versions, while the “estimated costs of works” definition provided	The Applicant refers Wiltshire Council to its response given to DCO2.24 in the Applicant's Response to the Examining Authority's Second Written Questions [REP5-097] and its response given above to DCO2.23b. The Applicant and welcomes ongoing engagement with Wiltshire Council in respect of Protective Provisions.

ExQ2	Question to:	Question:	Applicant's Response
		by the Council has not been included in the applicant's version. The ExA also notes that in the applicant's definition of "the bond sum", sub-paragraph (c) refers to National Highways, when it should refer to the local highway authority. <u>The Applicant:</u> The applicant is required to identify for the ExA all variances between the two versions and advise what discussions are taking place to resolve these variances. The ExA appreciates that prior to deadline 5 the drafting of the protected provisions for the local highway authority may evolve, such that a revised version of the provisions may be submitted into the examination, but it would nonetheless be helpful to the ExA for the variances from the Council's version to be clearly identified, explained and justified. The applicant is also asked to explain whether any revisions are required to the drafting of Articles 8 to 16, or Requirement 15 (or the oCTMP) in light of these protected provisions. The ExA is seeking to be absolutely clear on whether Article 47,	

ExQ2	Question to:	Question:	Applicant's Response
		Schedule 16 or the protected provisions take priority in the consent/ approval arrangements contained within Articles 8 to 16 and Requirement 15. <u>Wiltshire Council:</u> Wiltshire Council is also invited to make submissions if required. As set out in response to DCO2.23 above, Wiltshire Council will confirm its preferred Protective Provisions for the benefit of the Local Highway Authority at Deadline 6.	
Schedule 16 - Procedure for Discharge of Requirements			
DCO2.28	The Applicant Wiltshire Council	Fees Q1 Schedule 16(5) relates to fees associated with the discharge of the dDCO requirements. Can the applicant explain how it has arrived at the fees quoted in sub-paragraph (2)(a) to (c) and why there is no provision for increasing these fees in line with any uplifts in line with the Consumer Prices Index for example?	See response to DCO2.28 of The Applicant's Response to the Examining Authority's Second Written Questions [REP5-097] explaining that the fee structure suggested is taken from Schedule 1 of the Town and Country Planning (Fees for Applications, Deemed Applications, Requests and Site Visits) (England) Regulations 2012. The Applicant has added a provision to confirm that the fee payable in respect of

ExQ2	Question to:	Question:	Applicant's Response
		The ExA is aware that the Government recently published its response to the Fees for Planning Applications Consultations, which includes consideration of local authorities being able to set their own fees locally to meet their actual costs. The ExA is therefore seeking to understand from the applicant how it has arrived at the fee sums included in Schedule 16(5)(2)(a) to (c) and whether this has involved any discussion and agreement with Wiltshire Council. Wiltshire Council is also invited to comment. In the comments submitted by Wiltshire Council in its first review of the dDCO (and as replicated in the council's Relevant Representation), the council requested that additional wording be added against each numerical charge in Clause 5 of Schedule 16 to state: "or the fees applicable at the time of application by the Applicant". This was requested given the anticipated 60-year scheme life of the scheme, and the acknowledgement that fees would change, and likely increase, over this time period.	the decommissioning requirement would be the fee listed in the Regulations at that point in time.

ExQ2	Question to:	Question:	Applicant's Response
		The council strongly contends that it should not be financially disadvantaged in order to fulfil its discharging obligations with respect to this scheme, should it be consented. As a minimum, the council considers that any specified fees should rise with CPI in the event that they are not linked to the fees applicable at the time of application.	
Ecology and Biodiversity (EB)			
EB2.1	Natural England The Applicant	Livestock and 400kV Cable Depth <u>Natural England:</u> 1) The ExA asks that Natural England provide advice on the minimum depth a 400kV cable should be buried across farmland, whether used for livestock grazing or arable activities, to avoid adverse effects on agricultural practice. Whilst it is acknowledged that this question was posed to Natural England, Wiltshire Council has sought advice from Scottish and Southern Energy which states that the minimum depth that a 400kv cable should be	The Applicant refers Wiltshire Council to its response to EB2.1 in the Applicant's Response to the Examining Authority's Second Written Questions [REP5-097]. The Applicant notes Wiltshire Council's comment, and guidance received from Scottish and Southern Energy. The Applicant confirms that the 400kv Grid Connection Cables, and Interconnecting Cables, will be buried up to 2m deep and to a minimum depth of 1.2m in fields returned to agriculture during the operation of the Scheme, as set out within ES Volume 1, Chapter 3: The Scheme [APP-055].

ExQ2	Question to:	Question:	Applicant's Response
		buried is 1.1m. The full guidance that the council received is attached at Appendix A to this submission. <u>The Applicant:</u> 2) Confirm the absolute minimum depth the 400kV cable will be buried below ground level throughout the Order limits and explain what efforts will be made to avoid the effects of electromagnetic fields on agricultural practice.	
EB2.5a	Wiltshire Council	White-Clawed Crayfish The ExA notes Wiltshire Council's position in the SoCG item 3.5.20 [REP4-061] and it is now an 'Agreed' item. The Council is asked to explain its position given the potential conflict between maintaining its concerns over the lack of survey work and the wording of [REP4-091], pages 39 – 40. This raises question marks over whether this should be an 'Agreed' item. Further to this, should the applicant commit to a 10m buffer to all watercourses, the Council is asked to comment if this would address its concern over a lack of survey work.	The Applicant is continuing its discussions with Wiltshire Council on the Statement of Common Ground. A revised Statement of Common Ground with Wiltshire Council [EN010168/EXAM/8.2] (Revision 4) was submitted at Deadline 6.

ExQ2	Question to:	Question:	Applicant's Response
		It is assumed that the ExA intended to reference pages 51-52 of [REP4-091] rather than pages 39-40 given that the latter pages do not contain comments provided by Wiltshire Council's ecology officer and do not relate to concerns over lack of survey work or discussion regarding white-clawed crayfish. Item 3.5.20 of 8.2 Statement of Common Ground with Wiltshire Council (Rev 2) [REP4-061] essentially covers two interrelated but distinct points within the one item. The point of 'agreement' does not pertain to it being agreed that no survey having been undertaken is acceptable, and this is explicit within the council's statement. Instead, it relates to it being noted by the council that the Applicant had re-evaluated the ecological importance assigned to the species following previous comments from the council. As such, the parties have marked this point as agreed. The Applicant's adopted scope of survey in general and assumed presence of protected	

ExQ2	Question to:	Question:	Applicant's Response
		species where targeted species specific survey / Phase 2 survey has not been conducted remains a concern for the council, including in respect of white-clawed crayfish, as indicated in item 3.5.20, and articulated in <u>[REP2-048]</u> and <u>[REP4-091]</u>. Therefore, this item is not wholly agreed. As such, the council understands the ExA's rationale for posing question EB2.5 and upon reviewing item 3.5.20 of the SoCG again, considers this item and the assigned status of 'agreed' as inaccurate and lacking clarity given that not all the points covered within the item have been adequately addressed or overcome and are therefore in fact, not all 'agreed'. With this in mind, the council suggests that item 3.5.20 will either need to be broken down into two distinct items with separate reference numbers, column position statements and statuses, or that the status of the extant item will need to be amended so that it no longer states 'agreed'. Implementing this action will be progressed with the Applicant in	

ExQ2	Question to:	Question:	Applicant's Response
		the SoCG iteration to be submitted at Deadline 6.	
EB2.5b	Wiltshire Council	If the Applicant commits to a 10m buffer to all watercourses, whilst this would be welcomed by the council, it will not wholly address or overcome the council's concern regarding a lack of survey work for the reasons already detailed in [REP2-048] and [REP4-091]. In addition, it won't be possible to implement 10m buffers at the locations where new circa 6m wide permanent accesses for culverts are proposed across 'wet' ditches at Lime Down D, and it is understood that suitable habitat for white-clawed crayfish exists at these locations. As detailed in the aforementioned representations, the assumption of species presence shouldn't preclude proper consideration of, and adherence to the requirements set out in Natural England's standing advice relating to white-clawed crayfish; nor should it preclude appraisal of whether the proposed avoidance and mitigation is sufficient, or whether additional measures are required, as well as whether a mitigation licence could be required to permit some works, particularly	The Applicant notes this comment. The Applicant does not intend to increase the minimum buffer size from all watercourses from 8m to 10m. The Applicant notes that the suitability of proposed buffer sizes from watercourses within the Scheme have now been marked as 'Agreed' with the Environment Agency following recent consultation; an updated Statement of Common Ground with the Environment Agency [EN010168/EXAM/8.6] (Revision 3) reflecting this position was submitted at Deadline 6. The Applicant maintains that the mitigation measures proposed provide adequate and proportionate mitigation for potential impacts to white-clawed crayfish, as set out in previous responses including the response provided to question EB1.11 (pages 260 to 263) within the Applicant's Response to Other Parties' Responses to Examining Authority's First Written Questions [REP4-081].

ExQ2	Question to:	Question:	Applicant's Response
		for the new permanent accesses for culverts proposed across 'wet' ditches at Lime Down D. This applies regardless of whether a 10m buffer would be implemented given that as discussed above, it would be necessary to undertake works within this buffer during the construction of the permanent accesses for culverts and a mitigation licence may in fact be needed to allow these works to proceed legally if white-clawed crayfish are present; and this cannot be established without targeted survey.	
EB2.13	The Lead Local Flood Authority The Applicant	Ordinary Watercourse Buffers <u>The LLFA:</u> The EA's post-hearing submission [REP4-097] provides details of why a 10m buffer from the bank top of sensitive watercourses is appropriate. However, they defer to the LLFA for ordinary watercourses. Please confirm your expectation with respect to buffers to protect ordinary watercourses. Wiltshire Council considers that a minimum 10 m buffer from the bank top of ordinary watercourses should normally	The Applicant refers Wiltshire Council to its response to EB2.13 in the Applicant's Response to the Examining Authority's Second Written Questions [REP5-097]. The Applicant does not consider that a scheme-wide minimum 10 m buffer from all Ordinary Watercourses is necessary or proportionate. The minimum 8 m development-free buffer has been established as the baseline Scheme control to maintain separation from watercourses, preserve access for inspection and maintenance, protect bank stability and conveyance, and provide a vegetated margin between development activities and the receiving water environment. This

ExQ2	Question to:	Question:	Applicant's Response
		be maintained throughout the Scheme. This provides a proportionate baseline for maintenance access, protection of watercourse function, flood conveyance, bank stability, water quality and riparian corridor management. The LLFA recognises that wider buffers may be appropriate in certain locations depending on site-specific characteristics, maintenance requirements, ecological constraints, natural flood management opportunities, floodplain interaction and watercourse sensitivity. Accordingly, 10 m should be treated as a minimum standard rather than a fixed requirement in all circumstances. <u>The Applicant:</u> The applicant is asked to justify why it considers a lesser buffer of 8m is acceptable, especially given its approach to assume the presence of protected species in each habitat type and the position of the EA as per the post-hearing submission [REP4-097]. This should provide further detail to the post-hearing submission [REP4-086].	approach is embedded within the Flood Risk Assessment and Drainage Strategy [REP5-047 to REP5-060], the Outline CEMP [REP5-071] and the Water Framework Directive Assessment [APP-289]. Access tracks similarly respect the 8 m buffer except where a watercourse crossing is required. The Applicant notes the LLFA's reasons for preferring a 10 m minimum, but considers that the relevant functions are appropriately protected by the 8 m baseline when combined with the wider Scheme controls. No site-specific hydraulic, geomorphological or maintenance constraint has been identified which demonstrates that increasing the minimum setback from 8 m to 10 m across every Ordinary Watercourse would materially improve flood conveyance, bank stability, maintenance access or surface water management. Where a greater stand-off is warranted by the characteristics or sensitivity of a particular watercourse, the Scheme already provides for a wider buffer. This is particularly relevant to the ecological matters referred to by the ExA. The Scheme does not apply an 8 m buffer irrespective of ecological sensitivity. The ecological buffer framework provides a minimum 8 m

ExQ2	Question to:	Question:	Applicant's Response
			buffer from ditches, increasing to 10 m for ditches with signs of water vole and to 15 m for some minor watercourses depending on their ecological value, with still wider buffers applied to other sensitive ecological features. The minimum 8 m requirement therefore operates as a baseline, with the site-specific ecological assessment determining where additional separation is necessary. This approach is identified in the Schedule of Protective Ecological Buffers [APP-205] and secured through the Outline EPMS [REP5-081]. In its Responses to the ExA's Second Written Questions (ExQ2) [REP5-124] at Deadline 5, the Environment Agency confirms under item EA-021 that it has agreed with the Applicant's proposal to maintain a minimum 8 m watercourse buffer from ditches, following further discussion with the Applicant on 28 July 2026 and review of ES Volume 3, Appendix 9-8: Schedule of Protective Ecological Buffers [APP-205]. The Applicant therefore considers that a blanket increase to 10 m would not provide a proportionate additional benefit. A minimum 8 m development-free buffer provides the baseline protection required for Ordinary Watercourses, while the secured framework allows and requires wider buffers where site-specific ecological or other sensitivities justify them. This approach preserves the necessary flexibility for

ExQ2	Question to:	Question:	Applicant's Response
			detailed design while ensuring that watercourse function, access, flood conveyance, bank stability, water quality and ecological interests are appropriately protected.
EB2.14a	The Applicant Natural England Wiltshire Council	Mitigation Hierarchy <u>The Applicant:</u> The applicant's approach to species in the CRC assumes the presence of species and intends to rely on mitigation to avoid harm such as pre-construction surveys to inform the cable installation route. Given the assumption of the presence of species the applicant is asked if it would commit to out of season works in relation to those protected species where they have assumed presence, unless otherwise agreed with Wiltshire Council in consultation with Natural England to an alternative. If the applicant is minded to agree to this approach, then it should update the relevant control documents accordingly beyond that already specified in table 3 of the oCEMP [REP4-049]. It should also provide details of those months where types	The Applicant notes Wiltshire Council's comment. The Applicant refers to the relevant response provided to Question EB2.14 in the Applicant's Response to the Examining Authority's Second Written Questions [REP5-097] submitted at Deadline 5.

ExQ2	Question to:	Question:	Applicant's Response
		of works will be avoided to protect the assumed presence of protected species. It is noted that the SoCG with Natural England confirms this approach for hedgerow removal to protect dormice [REP4-063], and the SoCG with the EA regarding coarse fish spawning [REP4-068]. <u>Natural England and Wiltshire Council:</u> Should the applicant agree to the above avoidance measure to protect ground nesting birds and other assumed presence of protected species do you consider that this would avoid any Likely Significant Effects (LSE) and meet with the terms of the mitigation hierarchy? If not, please provide details. Whilst the council would welcome a commitment from the Applicant to implement out of season works in relation to those protected species where they have assumed presence, and where this would avoid and reduce impacts, unless otherwise agreed with Wiltshire Council, the council's Ecology	

ExQ2	Question to:	Question:	Applicant's Response
		Officer respectfully seeks clarity regarding what the ExA envisages the mechanism by which such an agreement (where applicable) that it would not be required, would comprise and details of the juncture at which such an agreement would take place? It would be helpful to understand if the ExA is suggesting that such agreements would take place prior to determination of the DCO application by means of 8.2 Statement of Common Ground with Wiltshire Council and / or after determination of the application but pre-commencement by means of the discharge of conditions / control document application process.	
EB2.14b	The Applicant Natural England Wiltshire Council	In respect of the example given in EB2.14, which states that the SoCG with Natural England (NE) [REP4-063] confirms the approach of committing to out of season works for hedgerow removal to protect dormice, and includes a link to the SoGG, the council would draw the ExA's attention to the apparent discrepancy and disconnect between what is stipulated in NE's Position Statement against item 3.3.15 of the SoCG and their understanding of what	The Applicant notes this comment. It should be noted that general principles for seasonal timing of habitat removal, including removal of hedgerow for cable installation, are set out within Section 6.2 (under Method Statement 5) of the Outline EPMS [REP5-081] , and state that habitat clearance should be undertaken during the months of March to October inclusive and that, where this is not possible, further precautions will be necessary. Details of such

ExQ2	Question to:	Question:	Applicant's Response
		will be conducted, and what is actually stipulated in Method Statement 13: Specific Measures for Avoidance of Impacts on Dormice detailed in the latest iteration of 7.19 Outline Ecological Protection and Mitigation Strategy (Rev 4) [REP4-056]. There are several issues with Method Statement 13 that undermine the protection it should afford to dormice, and full comments relating to these matters and REP4-056 are detailed in response to question DCO2.1. However, to aid explanation of the discrepancy between NE's understanding of what the Applicant will implement to protect dormice and what is detailed in the EPMS control document, an extract from NE's Position Statement under item 3.3.15 relating to dormice in their SoCG is set out below: <i>"The Applicant has clarified how hedgerow removal will be carried out, including whether clearance will be single or two-stage. Proposed works align with recommended seasonal timings to avoid impacts to breeding or hibernating dormice or provide</i>	precautions in relation to dormice are provided in Method Statement 13. It is the Applicant's view that sufficient justification has been provided within the Outline EPMS [REP5-081] where non-standard timings may be applied to hedgerow removal works, including the presence of only short sections of vegetation to be removed and the capability to undertake thorough fingertip searches in line with Mammal Society guidance. This aligns with the Position Statement with Natural England in the Statement of Common Ground. Furthermore, the assessment presented within ES Volume 1, Chapter 9: Ecology and Biodiversity [REP4-010], concludes that no likely significant effects on dormice are anticipated as a result of the Scheme, including during construction, as the avoidance and mitigation measures proposed are considered to be sufficiently robust.

ExQ2	Question to:	Question:	Applicant's Response
		<i>clear justification where non-standard timings are proposed."</i> Whereas Method Statement 13 in the oEPMS [REP4-056] stipulates: <i>"14.3.1: Prior to any removal of hedgerow or dense scrub, a suitably experienced and licensed EcoCoW will carry out a pre-commencement inspection to ensure that there are no dormice or dormouse nests present within the sections of vegetation due to be removed. This inspection will comprise a fingertip search of all vegetation to be removed, including the hedgerow bases, for signs of summer or winter hibernation dormouse nests.</i> <i>14.3.2 Where no signs of dormice or their nests are found within a particular section, vegetation clearance can progress under the supervision and direction of the EcoCoW via a single-stage clearance. This is appropriate for any time of year due to the relatively small sections of hedgerow requiring removal in any one location, meaning all areas can be comprehensively checked in accordance with Mammal Society guidance</i>	

ExQ2	Question to:	Question:	Applicant's Response
		<i>for finger-tip searching. In areas of dense vegetation, the EcoCoW may need to repeat the fingertip search as more areas become accessible, and it may be necessary to cut hedgerow to approximately 300 mm above ground level in the first instance to ensure that the hedgerow base is accessible and can be inspected by the EcoCoW prior to removal."</i> It is therefore apparent that NE is under the impression that the hedgerow removal will be sensitively and seasonally timed to avoid the dormouse breeding and hibernating season, but in fact it is evident from paragraph 14.3.2 of Method Statement 13 in the oEPMS, that the works will not be seasonally timed and instead will be undertaken at any time of the year. Furthermore, Method Statement 13 does not stipulate or discuss any seasonal restrictions to the works being undertaken or prescriptions in relation to avoiding particular times of the year. As such, the perception that an approach has been proposed with respect of hedgerow removal that would	

ExQ2	Question to:	Question:	Applicant's Response
		entail seasonally timing works to avoid impacts to dormice given that it has been assumed present within all suitable habitat in the absence of targeted species-specific survey having been undertaken, appears to be flawed. Thus, in answer to the ExA's question regarding whether the council considers that agreement by the Applicant to the above avoidance measures would protect ground nesting birds and other protected species assumed to be present such that it would avoid any Likely Significant Effects (LSE) and meet with the terms of the mitigation hierarchy, the answer is no on account of the matters discussed herein regarding dormice.	
EB2.14c	The Applicant Natural England Wiltshire Council	Likewise, in respect of ground nesting birds, the answer is also no. This is because although timing the works outside of the breeding season will avoid direct impact to birds, their nests, eggs and young, the proposed works will still inevitably result in a significant loss of nesting habitat for subsequent breeding seasons, and this would not be wholly	The Applicant notes this comment. As set out within the relevant response provided to Question EB2.14 in the Applicant's Response to the Examining Authority's Second Written Questions [REP5-097] submitted at Deadline 5, the Applicant does not consider it appropriate or necessary to commit to blanket restrictions on seasonal timing of works (unless otherwise agreed) for those species

ExQ2	Question to:	Question:	Applicant's Response
		negated or ameliorated by the seasonal timing of works, and significant adverse effects would occur regardless of when the works take place. If the works to ground nesting bird habitat were undertaken within the winter months, once the next breeding season commences, there will still be a reduction in the area and availability of nesting habitat for ground nesting bird species; and birds, including returning birds, will be displaced into adjacent and nearby fields, including the proposed ecological mitigation areas or will have to seek other suitable habitat further afield. Moreover, the residual significant effect on ground nesting birds is clearly detailed in 6.1 Environmental Statement Volume 1 Chapter 9 Ecology and Biodiversity (Rev 3) [REP4-011] which states in paragraph 9.13.4: <i>“Residual significant adverse effects (after all mitigation has been considered) as a result of the Scheme are however anticipated for the following Important Ecological Features:</i> <i>68. Hedgerows</i>	assumed to be present within the Cable Route Corridor, including ground-nesting birds. The Applicant agrees with Wiltshire Council's conclusion that seasonal timing of works with respect to ground-nesting birds would not be anticipated to avoid the significant residual adverse effects set out within ES Volume 1, Chapter 9: Ecology and Biodiversity [REP4-010]. However, the Applicant clarifies that the temporary loss of habitat and displacement of ground-nesting birds within the Cable Route Corridor during construction is not anticipated to result in a loss of nesting habitat in the long-term following habitat reinstatement, with temporary impacts limited to the duration of construction only. Displacement of ground-nesting birds at the Solar PV Sites is considered to be the primary impact resulting in residual adverse effects on this receptor, where breeding bird surveys have been undertaken and presence of ground-nesting birds has been confirmed, as opposed to assumed. The Applicant considers that the range of secured measures to avoid or minimise impacts during detailed design and construction set out within the Outline

ExQ2	Question to:	Question:	Applicant's Response
		<i>69. Breeding Birds – Ground Nesting Birds of Open Habitats;”</i> It is recognised that Method Statement 10: Avoidance of Impacts on Ground Nesting Birds of Open Habitats in the oEPMS [REP4-056] does not currently propose seasonal timing of works when undertaking construction works within arable or pasture fields in order to avoid and reduce impacts on ground nesting birds, and that therefore the impact of implementing such measures have not been assessed within Chapter 9 of the ES [REP4-011]. Nevertheless, it is considered that even if such avoidance measures were proposed and implemented, there would still be significant adverse effects on ground nesting bird species given the scale of loss of valuable habitat for ground nesting birds. That being said, timing of construction works within arable and pasture fields outside of the nesting season would at least reduce the adverse effects, and so the council is supportive of the ExA requesting inclusion of, and adherence to, such avoidance	EPMS [REP5-081] are sufficiently proportionate and robust. The Applicant also clarifies that wintering bird surveys have indeed been completed at the Solar PV Sites with details of survey methodology and results provided in ES Volume 3, Appendix 9-7: Wintering Bird Survey Report [APP-204].

ExQ2	Question to:	Question:	Applicant's Response
		measures. Given the phrasing of question EB2.14, the council would, however, just highlight that breeding bird surveys have been undertaken within the Solar PV Sites to ascertain the species present rather than merely assuming presence; notwithstanding that the council has raised a few issues / limitations in respect of the survey methodology adopted. The council would also point out that timing construction works within arable and pasture outside of the breeding season could have an impact on overwintering birds, and as discussed in the council's previous representations, dedicated wintering bird surveys have not been conducted within the Solar PV Sites or the Cable Route Corridor (CRC).	
EB2.15	Wiltshire Council	Wiltshire Council Concerns Wiltshire Council is requested to provide a summary of outstanding ecology concerns that relate to each element of the proposal in a table that highlights matters in the solar PV sites and/ or the CRC. A suggested layout is provided below:	The Applicant is continuing its discussions with Wiltshire Council on the Statement of Common Ground. A revised Statement of Common Ground with Wiltshire Council [EN010168/EXAM/8.2] (Revision 4) was submitted at Deadline 6.

ExQ2	Question to:	Question:	Applicant's Response
		Outstanding Issue (brief summary/ headline issue) Solar PV Sites Cable Route Corridor It has transpired during the preparation of a response to this question, that this is a not insubstantial task and is proving to take some time to compile. In order to facilitate the provision of a comprehensive summary of all of the outstanding concerns, the council seeks an extension with a view to providing a full response to the ExA for Deadline 6. Furthermore, it is the council's understanding from a meeting with the Applicant on 4 August 2026, that there is an intention to restructure the Statement of Common Ground with Wiltshire Council and therefore, a revised version of the SoCG may also provide an answer to this question if it is amended to ensure that it captures all outstanding issues, and sets out and accurately reflects the associated latest positions of both parties on each issue / matter.	
EB2.17a	The Applicant	Ancient Woodland – Surrendell Wood	The Applicant refers Wiltshire Council to its response to EB2.17 in the Applicant's Response to the

ExQ2	Question to:	Question:	Applicant's Response
	Wiltshire Council	The applicant's deadline 4 response to ISH3 Action Point 21 [REP4-086] refers to the use of an existing track that encroaches within the 15m buffer to Surrendell Wood. The ExA notes the applicant's position that use of the existing track would be less environmentally intrusive than the construction of a new access route. The Applicant: The applicant is requested to provide further evidence supporting this conclusion, including details of any surveys, assessments, existing levels of vehicular use, or other information relied upon in selecting this approach. The applicant should also explain how any potential effects on the ancient woodland would be monitored during construction and operation, and what mitigation measures would be implemented should adverse effects be identified. Wiltshire Council: Having regard to the applicant's deadline 4 response to ISH3 Action Point 21 [REP4-086], the Council is requested to set out its	Examining Authority's Second Written Questions [REP-097]. The track adjacent to Surrendell Wood has been subject to historical heavy 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 [REP5-071]. The Applicant considers that appropriate mitigation and monitoring are already secured through the Arboricultural Method Statement and the Outline CEMP [REP5-071], which together provide suitable protection for Surrendell Wood during construction.

ExQ2	Question to:	Question:	Applicant's Response
		position on the proposed use of the existing access track within the 15m buffer to Surrendell Wood. In particular, the Council should identify: 70. its specific concerns regarding use of the existing track; 71. whether it agrees that use of the existing track would be less intrusive than the creation of a new access route; and 72. any additional mitigation, monitoring or controls that it considers necessary. Wiltshire 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	Notwithstanding this position, the Applicant has strengthened the measures secured through the Outline CEMP [EN010168/APP/7.12] (Revision 7), submitted at Deadline 6. These measures include: • provision of protective fencing, where appropriate, along the woodland edge in accordance with the principles of BS 5837:2012, to prevent construction vehicles leaving the existing track and entering the adjacent woodland or its buffer; • provision of suitable ground protection where the existing track is identified as having insufficient stability or load-bearing capacity for the size and weight of construction vehicles using it, with the type and extent of protection determined having regard to anticipated vehicle movements and ground conditions; • monitoring by the Arboricultural Clerk of Works (ACoW) of works or activities within the ancient woodland buffer that are not otherwise addressed by the detailed CEMP or detailed Arboricultural Method Statement (AMS); and • notification to the relevant Local Planning Authority of any material incident or material

ExQ2	Question to:	Question:	Applicant's Response
		land take and excavation. Whilst the council accepts the principle of using the existing track, it has the following concerns: 73. The potential for construction traffic to deviate from the existing track and encroach into adjacent woodland habitat. 74. Localised degradation of the track surface that could lead to rutting, soil compaction or indirect impacts on retained trees and woodland edge habitats. 75. 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. 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	departure from the approved AMS associated with works adjacent to Surrendell Ancient Woodland, and of any evidence identified by the ACoW that construction activities have resulted in adverse effects on the ancient woodland. The Applicant therefore considers that the continued use of the existing track, together with the existing measures secured through the AMS and the additional controls now incorporated into the Outline CEMP [EN010168/APP/7.12] (Revision 7), provides an appropriate and proportionate approach to protecting Surrendell Ancient Woodland during construction. The Applicant considers that this matter is therefore addressed.

ExQ2	Question to:	Question:	Applicant's Response
		ancient woodland and avoids unnecessary impacts associated with new construction works.	
EB2.17b	The Applicant Wiltshire Council	The council considers the following mitigation, monitoring and controls measures necessary: 76. Protective fencing should be installed where appropriate along the woodland edge to prevent vehicle egress from the existing track, in accordance with the principles of BS 5837:2012 Trees in Relation to Design, Demolition and Construction. 77. Suitable ground protection measures should be used in locations where the existing track demonstrates insufficient stability for the size and weight of construction vehicles. 78. No excavation, track widening or other ground disturbance should take place within any part of the track located inside the 15m ancient woodland buffer.	The Applicant refers Wiltshire Council to its response to EB2.17a

ExQ2	Question to:	Question:	Applicant's Response
		79. 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). 80. The Local Planning Authority should be informed of any incidents, 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, 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.	
EB2.18	The Applicant Wiltshire Council	Trenchless Techniques – Protection of Root Systems and Soil Structure	The Applicant notes this comment. As set out in Table 4 of the Outline CEMP [REP5-071] – All machinery used for trenchless solutions (e.g.

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		National Highways response to ExQ1 NH-008 [REP4-098] refers to concerns regarding the depth of trenchless techniques and the potential to damage root systems and/ or soil structure with respect to trees reference N/TPO7. National Highways remains unconvinced by the details of the applicant's approach and therefore considers these trees should form part of Schedule 12 of the DCO. <u>The Applicant:</u> You are requested to address National Highways' concerns regarding the proposed use of trenchless techniques in the vicinity of trees N/TPO7. Please identify: 81. the proposed minimum depths and offsets from root protection areas 82. the assessment undertaken to demonstrate that roots and soil structure will not be adversely affected 83. the management documents in which these controls would be secured	HDD) will be situated outside the RPAs of retained trees. Entry and exit points for the trenchless solutions will be sited more than 15m from retained tree stems. Trenchless solution depths will exceed 1m under RPAs. Details of trenching and HDD will be provided at the detailed design stage which the above principles being adhered to.

ExQ2	Question to:	Question:	Applicant's Response
		84. whether any amendments to dDCO Article 41, Schedule 12, or relevant management plans are proposed to address National Highways' concerns. <u>Wiltshire Council:</u> Although trees N/TPO7 are located on National Highways land, please provide your professional opinion on whether the applicant has demonstrated that the proposed trenchless techniques generally across the Order limits would avoid unacceptable impacts on tree root systems and soil structure. If not, please specify: 85. what additional information is required 86. whether additional mitigation or controls should be secured 87. the mechanism by which such controls should be secured 88. any revised drafting considered to be necessary to the dDCO.	

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		Wiltshire Council acknowledges that trenchless techniques, when appropriately designed and implemented, can significantly reduce direct impacts on tree root systems and associated soil structure compared with conventional open-cut trenching. However, the information currently presented does not fully demonstrate that unacceptable impacts on retained and / or protected trees would be avoided in all locations across the Order Limits. While the principle of trenchless installation is supported, greater certainty is required regarding the design parameters, implementation controls, monitoring arrangements and contingency measures where works are proposed within the influence of retained and / or protected trees. The detailed design needs to consider the category of tree to ensure that there is no removal of any Category A tree to facilitate the HDD. A clear methodology for dealing with inadvertent drilling returns, bore collapse, settlement or other construction	

ExQ2	Question to:	Question:	Applicant's Response
		anomalies that may affect root protection areas is required. The Applicant should provide detailed trenchless crossing drawings showing entry and exit points, horizontal and vertical offsets from the Root Protection Area (RPA), and tree-specific assessments where trenchless techniques are proposed within or immediately adjacent to RPAs of Category A, Veteran, or Ancient trees, and protected trees subject to TPOs, thereby demonstrating that there will be no significant loss of rooting volume, and there is no unacceptable risk of soil fracturing, heave, settlement or desiccation affecting the structural rooting environment.	
Flood Risk, Hydrology and Water Resources (FHW)			
FHW2.2a	The Applicant The Lead Local Flood Authority	Surface Water Assessment - Outline Drainage Strategies The outline drainage strategies and covering report are included in the ES Volume 3 (Appendices 11-2 to 11-8 [REP4-021], [REP4-023], [REP4-025], [REP4-027], [REP4-029], [REP4-031], [REP4-033], [REP4-035]). Within the site-specific outline drainage strategies, the applicant analysed and	The Applicant has responded separately to points 1 to 8 of FHW2.2 in The Applicant's Response to the Examining Authority's Second Written Questions [REP-097] . The Flood Risk Assessment and Drainage Strategy suite [REP5-047 to REP5-060] was updated at Deadline 5 to clarify the treatment of access tracks, align the assessed infrastructure quantities, improve the presentation of runoff rates and attenuation requirements, review the everyday rainfall

ExQ2	Question to:	Question:	Applicant's Response
		quantified surface water run-off arising from the introduction of infrastructure (substations, conversion units, distribution switch rooms and some access tracks). After reviewing the information submitted, the ExA requests the following changes to the outline drainage strategies. The Applicant: 1) The applicant explains in the strategies that <i>Internal access tracks within the Solar PV Panelled Areas will be formed using permeable materials and,</i> <i>where practicable, maintained at existing ground levels. These tracks are not treated as positively drained hardstanding surfaces requiring formal attenuation, except where specifically and conservatively assessed within this Outline Drainage Strategy, such as the 132kV Substation access track.</i> The applicant should explain in the strategies the differences between the access tracks to understand the reasons and the location of those requiring formal attenuation and those which would not. If this	calculations and Causeway Flow outputs, provide consistent SuDS maintenance information, include the Lime Down D conceptual drainage layout and clarify the potential supplementary role of rainwater harvesting. As set out in that response, the Applicant also sought clarification from the ExA regarding the presentation of attenuation volumes. The ExA confirmed that its request was intended to ensure consistent information across the strategies and did not require separate indicative attenuation volumes to be calculated for each lesser return period at this outline stage. The updated strategies therefore present the governing indicative attenuation requirement, with the final drainage calculations to be undertaken as part of detailed design. In relation to point 9, the Applicant acknowledges Wiltshire Council's clarification that its Betterment Strategy seeks a minimum 30% reduction relative to the corresponding pre-development greenfield runoff rate across the relevant design events up to and including the 1 in 100-year event. The Applicant considers, however, that the purpose of the outline-stage assessment and the conservatism of the approach adopted within the Drainage Strategies

ExQ2	Question to:	Question:	Applicant's Response
		is due to soil compaction, the relevant environmental management plans should be reviewed to include reference to these access tracks and ensure that appropriate management and mitigation are in place for the lifetime of the development. 2) Include the correct number of conversion units/ sub distribution switch rooms for each plot in table 1 of the outline strategies. This should be corrected in the calculations and reflected within the body of the text and tables within the strategies. The applicant should ensure that the way information is presented is correct within the strategies and aligned with the information shown in all the strategies. 3) Table 2 of the strategies does not include the 1% Annual Exceedance Probability (AEP) plus 45% climate change event rates which is referred under the 'Extreme rainfall' section of the strategies. In some strategies, the table does not show the 1 in 100year (yr) run-off rates. Therefore, table 2 of all strategies should be reviewed and updated to show the discharge rates of all events (1	requires clarification. The strategies are not intended to represent the final detailed drainage design. Their purpose at this stage is to demonstrate that a workable drainage solution can be accommodated within the Scheme parameters and that sufficient attenuation and flow control can be provided without increasing flood risk elsewhere. The use of the 1 in 2-year greenfield runoff rate as the basis for the outline flow control is not arbitrary. The 50% AEP event is widely used in sustainable drainage design as a practical representation of the mean annual greenfield runoff condition and as the basis for defining a limiting discharge rate from attenuation systems. The Applicant has adopted a further 30% reduction to that baseline, restricting discharge to 70% of the calculated 1 in 2-year greenfield runoff rate. For the purposes of demonstrating drainage feasibility, that restricted rate has then been applied when assessing storage for the larger design events, including the 1% AEP event with the applicable 45% climate change allowance. This provides a deliberately conservative basis for the outline assessment. Greenfield runoff rates increase with increasing return period. Accordingly, if the 30% betterment criterion were applied separately to the corresponding higher

ExQ2	Question to:	Question:	Applicant's Response
		in 2yr, 1 in 30yr, 1in 100yr, 1in 100yr plus 45% climate change, 1 in 2 yr +30% betterment), the proposed discharge rates and attenuation volumes. 4) The applicant is asked to review the 'required additional depths' for the conversion unit/ sub distribution switch rooms included in the 'Everyday Rainfall' section of the strategies as some appear unusual. Also ensure that the contributing area includes all the units to ensure consistency between strategies. Some strategies add the area of all units whereas others show only one unit. 5) The Causeway Flow hydraulic calculations are included in Appendix E of the strategies. However, some strategies do not show all elements assessed and, in most cases, the dimensions and estimated required volumes are not clear in the calculations. Therefore, Appendix E should be reviewed in all strategies to ensure that it contains the calculations for all the elements assessed, their correct dimensions and the estimated	return-period greenfield runoff rate, the permissible discharge rate for that event would be greater than the fixed rate derived from the 1 in 2-year event. The resulting attenuation storage requirement would therefore be lower than that demonstrated using the more restrictive fixed discharge rate. The approach adopted within the Outline Drainage Strategies consequently tests a conservative storage case. It demonstrates that sufficient attenuation can be accommodated even where discharge during the governing higher-order events is restricted to the lower rate derived from the 1 in 2-year event. The assessment therefore provides a robust demonstration that a workable drainage strategy is achievable within the Scheme parameters. The Applicant agrees with the LLFA that attenuation storage and runoff-rate betterment are separate considerations. The outline assessment is not intended to demonstrate the final event-specific drainage design. Rather, it establishes that the required drainage infrastructure can feasibly be delivered within the Scheme while adopting conservative assumptions regarding both contributing hardstanding areas and discharge control.

ExQ2	Question to:	Question:	Applicant's Response
		required volumes. Please ensure that the dimensions and estimated required volumes are highlighted within the calculations. 6) Some strategies contain an appendix showing sustainable drainage systems (SUDS) maintenance schedules and others do not. Please ensure consistency between strategies. 7) The applicant committed in [REP3-128] to provide conceptual drainage layouts for the BESS and substation locations by deadline 4. The outline drainage strategy for Lime Down D [REP4-031] does not include a figure showing the conceptual drainage layout. This should be added. 8) The ExA asked the applicant in EXQ1 FHW1.16 to consider the use of rainwater harvesting. We note that, although the applicant has included references to rainwater harvesting in the drainage strategies, they are considered as unsuitable in Table 3. The ExA understands that it cannot be used as the sole means of disposal of excess water, however, it may be used in combination with other SUDS, to	The attenuation volumes presented within the strategies are consequently indicative rather than fixed detailed-design values. Final technology, equipment layouts, hardstanding areas, contributing catchments, levels, SuDS components and drainage configurations remain subject to detailed design. Once those parameters are known, the final drainage calculations will confirm the applicable greenfield runoff rates, restricted discharge rates and attenuation requirements and demonstrate compliance with Wiltshire Council's Betterment Strategy across the relevant design events. The drainage system will separately continue to be designed to provide sufficient attenuation for the 1% AEP event including the applicable climate change allowance and to ensure that there is no increase in flood risk elsewhere. The Applicant therefore does not agree that the use of the 1 in 2-year greenfield runoff rate as the basis of the outline assessment indicates that the drainage strategy has failed to consider the requirements of Wiltshire Council's Betterment Strategy. The approach provides a recognised and deliberately conservative basis for demonstrating at this stage that a workable drainage solution is achievable. Final event-specific

ExQ2	Question to:	Question:	Applicant's Response
		water new planting, to support fire water replenishment, etc. Can the applicant consider this and provide a response? <u>The LLFA:</u> 9) The applicant explains in the outline drainage strategies that surface water run-off will be discharged at controlled rates in line with greenfield runoff principles and the LLFA requirement for 30% betterment. Table 2 of the drainage strategies shows that the 30% betterment is calculated using the 1 in 2yr event. Can the LLFA please confirm agreement with the events assessed and the proposed betterment? The LLFA does not agree that the submitted assessments have demonstrated compliance with Wiltshire Council's Betterment Strategy and is therefore unable to confirm agreement with either the events assessed or the proposed betterment approach as currently presented. The Outline Drainage Strategies state that post-development runoff from positively drained hardstanding surfaces will be	compliance will be demonstrated through the detailed drainage design once the final Scheme parameters are known.

ExQ2	Question to:	Question:	Applicant's Response
		discharged in accordance with greenfield runoff principles and Wiltshire Council's requirement for 30% betterment. However, the proposed discharge rates have been derived by applying a 30% reduction to the calculated 1 in 2-year greenfield runoff rate and then applying that discharge rate across the drainage design. Wiltshire Council's Betterment Strategy requires a minimum 30% betterment relative to pre-development conditions across the range of design events up to and including the 1 in 100-year event. The submitted drainage strategies do not demonstrate that the required level of betterment has been assessed or achieved across the full range of return period events and instead rely upon a discharge rate derived from the 1 in 2-year event. Whilst attenuation storage has been sized to accommodate the 1% AEP event including climate change allowance, attenuation storage and runoff rate betterment are separate requirements. The LLFA does not consider that the submitted	

ExQ2	Question to:	Question:	Applicant's Response
		information demonstrates compliance with the Betterment Strategy simply by demonstrating adequate attenuation storage.	
FHW2.2b	The Applicant The Lead Local Flood Authority	The LLFA also notes that a number of Relevant Representations submitted during the Examination raise concerns regarding existing flooding, downstream flood risk, highway flooding, ordinary watercourse capacity, cumulative runoff effects and drainage infrastructure performance within catchments connected to the Scheme. The Betterment Strategy is intended not only to manage runoff at the development site itself, but also to reduce pressure on receiving drainage infrastructure, ordinary watercourses and downstream flood receptors. Demonstrating compliance across the full range of design events is therefore important to provide confidence that the development will not increase runoff rates, increase pressure on existing drainage systems, or contribute to increased downstream flood risk.	The Applicant welcomes the LLFA's recognition that the purpose of the betterment requirement is to reduce pressure on receiving drainage infrastructure, Ordinary Watercourses and downstream flood receptors. The Applicant agrees with the underlying objective that the Scheme should not increase runoff rates or flood risk elsewhere and that the committed betterment should provide an additional reduction relative to existing greenfield conditions. The matters raised regarding the application of Wiltshire Council's Betterment Strategy and the basis of the outline drainage assessment are substantively addressed in the Applicant's response to FHW2.2a above and are not repeated in full here. As explained in that response, the outline drainage assessment adopts a deliberately conservative approach to demonstrate that a workable drainage solution is achievable. Runoff from positively drained areas is generally restricted to 70% of the existing 1 in 2-year greenfield runoff rate, with that restricted rate then applied when assessing attenuation for the larger

ExQ2	Question to:	Question:	Applicant's Response
		Accordingly, the LLFA considers that additional information is required to demonstrate that the proposed drainage systems achieve a minimum 30% betterment relative to pre-development conditions across all relevant design events and that the proposed approach accords with Wiltshire Council's Betterment Strategy. On the basis of the information currently submitted, the LLFA cannot confirm agreement with either the return periods assessed for demonstrating betterment or the conclusion that the proposed discharge rates satisfy Wiltshire Council's Betterment Strategy.	design events, including the 1% AEP event with the applicable climate change allowance. For the higher return-period events, this represents a more restrictive discharge assumption than would result from applying a 30% reduction to the corresponding event-specific greenfield runoff rate and therefore provides a conservative assessment of the attenuation storage required. This approach provides confidence at the outline design stage that sufficient attenuation and flow control can be accommodated within the Scheme parameters. The final drainage design will subsequently confirm the contributing catchments, greenfield runoff rates, restricted discharge rates, attenuation requirements and SuDS arrangements and will demonstrate compliance with the applicable Wiltshire Council betterment requirements across the relevant design events. The Applicant also acknowledges the existing flooding and drainage concerns identified within parts of the wider catchments. These have informed the flood risk and drainage assessment, including consideration of receiving watercourses, drainage features, overland flow routes and downstream receptors within the Flood Risk Assessment and Drainage Strategy

ExQ2	Question to:	Question:	Applicant's Response
			suite [REP5-047 to REP5-060]. The Solar PV Panelled Areas will remain predominantly vegetated and permeable, while runoff from positively drained infrastructure will be controlled and attenuated in accordance with the drainage strategy. The Applicant therefore considers that the outline drainage strategy provides a robust and conservative demonstration that the Scheme can achieve the required runoff control without increasing pressure on downstream drainage systems or flood receptors. The more detailed demonstration of compliance with the applicable betterment criteria will appropriately be confirmed through detailed drainage design once the final Scheme layout and contributing catchments are known.
FHW2.2c	The Applicant The Lead Local Flood Authority	10) Can the LLFA consider if the proposed attenuation volumes are likely to be achieved through the proposed SUDS? This is particularly relevant for Lime Down D as the volume to be attenuated is large. The LLFA may want to liaise with the relevant Wiltshire Council ecology colleague to understand how SUDS may interact with the proposed ecological enhancements.	The basis on which the Outline Drainage Strategies demonstrate a workable and conservatively sized drainage solution is addressed in the Applicant's response to FHW2.2a above and is not repeated here. The Applicant agrees that the final attenuation sizing, hydraulic performance, exceedance routing, freeboard, maintenance arrangements and construction details will be confirmed through detailed drainage design once the final layout, contributing catchments and drainage configuration are known. These matters will

ExQ2	Question to:	Question:	Applicant's Response
		The LLFA notes that the Applicant has provided outline drainage calculations and indicative SuDS layouts demonstrating the attenuation volumes required and the land areas identified for attenuation storage. The information provided is consistent with the level of detail generally expected for an outline stage application and indicates that the proposed attenuation volumes are achievable in principle. The LLFA does not therefore object to the proposed attenuation volumes on the basis of insufficient detailed design information. However, final confirmation of attenuation sizing, hydraulic performance, exceedance routing, freeboard, maintenance arrangements and construction details should be secured through the detailed drainage design approval process required by the DCO.	be secured through the drainage approval process under Requirement 11 of the Draft DCO [REP5-012] and will be required to accord with the drainage principles established within the Flood Risk Assessment and Drainage Strategy suite [REP5-047 to REP5-060]. The Applicant therefore considers that the LLFA's response confirms the principal matter raised by the ExA, namely that sufficient land and an appropriate drainage approach have been identified to demonstrate that the required attenuation can be delivered, with the final design appropriately reserved for detailed design approval.
FHW2.2d	The Applicant The Lead Local Flood Authority	In relation to Lime Down D, whilst the attenuation volumes are notably larger than those associated with some other development parcels, the information submitted does not indicate that	The Applicant welcomes the LLFA's confirmation that, notwithstanding the larger attenuation requirement at Lime Down D, the information submitted demonstrates that the required storage volumes are achievable in principle.

ExQ2	Question to:	Question:	Applicant's Response
		the required storage volumes are unachievable. The LLFA's principal interest is ensuring that the detailed design demonstrates that all storage volumes remain available throughout the operational life of the development and that the hydraulic performance of the drainage system is not compromised by future land management or ecological enhancement proposals.	The basis on which drainage feasibility and the indicative attenuation requirements have been demonstrated is addressed in the Applicant's responses to FHW2.2a and FHW2.2c above and is not repeated here. The Applicant agrees that the detailed design must maintain the required effective storage volume and hydraulic performance throughout the operational life of the Scheme. The final drainage design will confirm the configuration, levels, freeboard, conveyance arrangements, maintenance access and operational requirements of the relevant SuDS features. Any landscape, ecological or land-management proposals within or adjacent to drainage features will be required to remain compatible with their hydraulic function and maintenance requirements. The detailed design and subsequent management arrangements will therefore ensure that planting, habitat creation or other land-management measures do not reduce the available attenuation volume, obstruct conveyance or compromise access required for inspection and maintenance. The Applicant therefore considers that the LLFA's remaining concern is appropriately addressed through

ExQ2	Question to:	Question:	Applicant's Response
			the detailed drainage design and associated operational management arrangements.
FHW2.2e	The Applicant The Lead Local Flood Authority	The LLFA also supports continued coordination between drainage and ecology design teams to ensure that ecological enhancement measures and multifunctional SuDS objectives are delivered in a compatible manner and that habitat proposals do not reduce the effective attenuation performance, maintenance access or long-term operation of drainage infrastructure.	The Applicant welcomes the LLFA's support for continued coordination between the drainage and ecology design teams to ensure that multifunctional SuDS and ecological enhancement measures are delivered compatibly. This matter is closely related to the Applicant's response to FHW2.2d above and is not repeated in full here. The detailed drainage design will establish the final attenuation areas, conveyance routes, maintenance access and operational requirements, and any ecological enhancement within or adjacent to those features will be required to maintain the necessary hydraulic function and effective storage volume. The Applicant therefore agrees that ecological enhancement should complement, and not compromise, the performance, accessibility or long-term operation of the drainage infrastructure.
FHW2.3a	The Environment Agency	Flood Risk Assessment – Hydraulic Modelling	The Applicant refers Wiltshire Council to its response given to FHW2.3 in the Applicant's Response to the

ExQ2	Question to:	Question:	Applicant's Response
	The Lead Local Flood Authority	The EA, in its hearing submission [REP4-097], explains that for Lime Down D modelling there are unresolved issues regarding the data used and missing information and requests further information from the applicant. The applicant submitted at deadline 4 the hydraulic modelling report for Lime Down E2 [REP4-089]. <u>The Environment Agency:</u> 1) Can the EA confirm if all the required further information for Lime Down D modelling has been submitted? 2) Can the EA please provide an update of the review of the hydraulic modelling for Lime Down E2 at deadline 5 confirming if further information is required and highlighting any significant issues found? <u>The LLFA:</u> 3) Considering the EA response to ExQ1 FWM1.4 (2) [REP3-146], the outputs from the applicant's Gauze Brook and Rodbourne Brook modelling which include the 3.33% AEP scenario and the	Examining Authority's Second Written Questions [REP5-097]. The Applicant notes the LLFA's confirmation that the modelled 3.33% AEP event provides an appropriate basis for informing consideration of the functional floodplain at Lime Down D. The Lime Down D Hydraulic Modelling Report [REP5-095] updated at Deadline 5 includes the 3.33% AEP event and associated flood extent mapping, specifically in response to the Environment Agency's request. The corresponding Lime Down D Flood Risk Assessment and Drainage Strategy [REP5-055] has also been updated at Deadline 5 to reflect the site-specific modelling. The Applicant considers that the modelled 3.33% AEP extent should be considered spatially rather than by treating entire field parcels as Flood Zone 3b. The modelling identifies the areas in which floodwater would flow or be stored and demonstrates that the principal interaction is confined to the Gauze Brook corridor and associated low-lying land. The BESS and substations have been sequentially located within Flood Zone 1 and no flood-sensitive electrical infrastructure is proposed within Flood Zone 3b.

ExQ2	Question to:	Question:	Applicant's Response
		evidence presented by the Stop Lime Down report [REP1-176], does this information support an extension to Flood Zone 3b in Lime Down D? If so, to which fields? The submitted 3.33% AEP modelling provides an appropriate basis for identifying the functional floodplain (Flood Zone 3b). Where the modelled 3.33% AEP extent extends beyond the Applicant's current Flood Zone 3b delineation, the LLFA would expect those areas to be considered as Flood Zone 3b unless there is evidence to justify an alternative approach. However, based on the information currently available to the LLFA, it is not possible to identify with confidence the specific field parcels within Lime Down D affected by any such extension.	Limited areas of Solar PV Panels may interact with the modelled 3.33% AEP extent. This interaction has been recognised within the flood risk assessment and is addressed through micro-siting, maintenance of floodplain conveyance and storage, and the secured requirement for the lowest leading edge of panels within the design flood extent to be at least 600 mm above the design flood level including climate change. Accordingly, the more detailed definition of the functional floodplain does not alter the overall conclusions of the Sequential or Exception Tests. The Scheme continues to locate the BESS, substations and other flood-sensitive infrastructure in the areas of lowest flood risk, while any limited interaction of Solar PV Panels with the functional floodplain is addressed through the embedded flood resilience and conveyance measures already assessed.
FHW2.3b	The Environment Agency The Lead Local Flood Authority	4) If your response to question 3 is positive, please explain any potential impact on the sequential and exception tests results. <u>The LLFA:</u> In your response to ExQ1 FHW1.12 [REP3-142] in relation to an ordinary watercourse	The Applicant acknowledges the LLFA's remaining comments regarding the Ordinary Watercourse in the vicinity of Fields D22 and D1. The latest Lime Down D Flood Risk Assessment and Drainage Strategy [REP5-055] identifies the minor watercourse and the associated area of mapped Flood Zone 3. Importantly, the assessment confirms

ExQ2	Question to:	Question:	Applicant's Response
		running between the fields D22 and D1 you requested the applicant to: 89. Undertake targeted topographic and channel survey of the watercourse corridor. 90. Provide proportionate hydraulic assessment (or equivalent evidence) to define flood extents, depths, and flow routes. 91. Demonstrate that the layout maintains conveyance, including appropriate stand-offs and no obstruction of flow paths. 92. Confirm how the watercourse will be protected and managed. 93. Address any consenting requirements for works affecting an ordinary watercourse. The Applicant has submitted additional hydraulic modelling and mapping which partially addresses the LLFA's request for survey and hydraulic assessment information. However, the Applicant has not	that the flood risk associated with this watercourse does not encroach into the area allocated for the proposed development. The Applicant therefore does not consider that further detailed hydraulic modelling of this minor watercourse is necessary or proportionate at the outline design stage. The function of the watercourse is nevertheless protected through the secured design and management framework. Existing watercourses, drainage features and overland flow routes will be retained, with a minimum development-free watercourse buffer applied unless a wider stand-off is required by site-specific environmental sensitivities. The final layout will be required to maintain existing conveyance and avoid obstruction or diversion of established flow routes. Where construction activity is required to cross or otherwise interact with an Ordinary Watercourse, the relevant controls are provided through the Watercourse Crossing Schedule [REP3-139], the Outline CEMP [REP5-071] and the detailed Water Management Plan. These provide for appropriate crossing methodology, protection of riparian corridors, temporary drainage and sediment control,

ExQ2	Question to:	Question:	Applicant's Response
		provided sufficient proportionate evidence to demonstrate that the outline layout maintains the function of the ordinary watercourse between D22 and D1, including maintenance of conveyance, appropriate stand-offs from the watercourse corridor, protection and management arrangements, and any consenting implications associated with works affecting the watercourse. Consequently, the LLFA considers that the matters raised in ExQ1 FHW1.12 have not been fully addressed.	maintenance of flows during construction and reinstatement following the works. The consenting position is also established through the Draft DCO [REP5-012]. Works affecting drainage interests are subject to the applicable provisions of Part 9 of Schedule 15, and the amended Article 17 clarifies the interaction between the discharge powers and the drainage authority Protective Provisions. The Applicant therefore does not consider that an unidentified future Ordinary Watercourse Consent represents an outstanding assessment issue. Where an approval is required for detailed works affecting a drainage asset, that approval will be obtained through the mechanism secured by the Draft DCO [REP5-012]. The Applicant therefore considers that sufficient information is available at this stage to demonstrate that the Ordinary Watercourse can be retained and protected without increasing flood risk, with the precise relationship between the final Scheme layout and the watercourse appropriately confirmed through detailed design.

ExQ2	Question to:	Question:	Applicant's Response
FHW2.3c	The Environment Agency The Lead Local Flood Authority	5) Considering the modelling provided for Lime Down D and its review by the EA, is your response to ExQ1 FHW1.12 still relevant or do you consider that the available information and the applicant's existing commitments will suffice? The LLFA has reviewed the additional hydraulic modelling information submitted by the Applicant and notes that it provides further evidence regarding flood extents, depths and flow routes within the wider watercourse system. The LLFA also notes the Environment Agency's review of the Lime Down D modelling and the Applicant's subsequent submissions. However, the LLFA considers that its response to ExQ1 FHW1.12 remains relevant. Whilst additional modelling and mapping information has been provided, the Applicant has not demonstrated, at the outline design stage, how the proposed layout adjacent to the ordinary watercourse between D22 and D1 will maintain the function of that watercourse,	The Applicant has substantively addressed the LLFA's remaining concerns regarding the Ordinary Watercourse between Fields D22 and D1 in its response to FHW2.3b above and does not repeat that response here. The Applicant welcomes the LLFA's acknowledgement that the additional hydraulic modelling provides further evidence regarding flood extents, depths and flow routes within Lime Down D. The Applicant considers that this additional evidence, together with the existing watercourse buffers, retention of drainage pathways, construction controls and the approval mechanisms contained within the Draft DCO [REP5-012], provides a proportionate basis for the outline Scheme. As explained in FHW2.3b, the minor watercourse and associated mapped flood risk do not encroach into the area allocated for the proposed development. The Applicant therefore does not consider that further site-specific hydraulic modelling of this feature is necessary before consent. The final layout will be required to maintain the watercourse corridor, conveyance and associated flow routes, with any works affecting drainage interests subject to the relevant detailed design and drainage authority controls.

ExQ2	Question to:	Question:	Applicant's Response
		including maintenance of conveyance, retention of appropriate stand-off distances, avoidance of obstruction to flow routes, and long-term protection and management of the corridor. Furthermore, the Applicant has not clearly addressed whether any works affecting the watercourse would require Ordinary Watercourse Consent or other land drainage consents. The LLFA therefore considers that the additional modelling partially addresses the request for hydraulic evidence but does not fully address the wider matters raised in ExQ1 FHW1.12. As such, the LLFA's position remains that proportionate information necessary to support the outline proposal has not yet been provided and further evidence is required to demonstrate that the proposed development will preserve the function of the ordinary watercourse and not increase flood risk.	
FHW2.4	The Lead Local Flood Authority	Flood Risk Assessment – Freeboard Allowance	The Applicant refers Wiltshire Council to its response to FHW2.4 in the Applicant's Response to the

ExQ2	Question to:	Question:	Applicant's Response
	The Applicant Stop Lime Down	The applicant explained in its response to ExQ1 FHW1.5 [REP3-128] that the <i>Manning calculations (...) were used to compare the assessed 1% AEP plus climate change levels with the conservative 0.1% AEP surface water mapping used for context, to understand local drainage pathways and to inform the micro-siting of infrastructure. (...) Manning calculations did not identify locations where the smaller ordinary watercourses or land drainage features would give rise to a significant flood risk to the Scheme, or where the Scheme would be likely to increase off-site flood risk through displacement of floodwater or interruption of existing flow routes. They also informed the micro-siting of infrastructure by helping to identify local flood flow pathways, indicative flood levels and areas where infrastructure should be avoided or managed through embedded mitigation. They were not intended to be a full dynamic hydraulic model of the catchments.</i> The EA in its response to [REP3-146] agreed that the Manning Calculations had limitations but were useful to contextualise the 0.1%	Examining Authority's Second Written Questions [REP5-097]. The Applicant welcomes the LLFA's broad agreement with the Environment Agency that the use of the Manning calculations alongside the RoFSW mapping provides a proportionate basis for assessing flood risk associated with smaller Ordinary Watercourses and drainage features where detailed hydraulic modelling is not available. The Applicant also agrees with the LLFA that the freeboard commitment operates as an additional resilience measure and is not a substitute for site-specific hydraulic assessment where such assessment is warranted. Detailed hydraulic modelling has therefore been undertaken at the principal areas of fluvial interaction, including Gauze Brook at Lime Down D and Gabriel's Well / Rodbourne Brook at Lime Down E2, while the proportionate Manning and RoFSW approach continues to be applied to smaller Ordinary Watercourses. For clarity, the freeboard position has also moved on from that originally described in the question. The Applicant has confirmed that, where Solar PV Panels are located within the 1% AEP plus climate change design flood extent, the lowest leading edge of the

ExQ2	Question to:	Question:	Applicant's Response
		AEP extent of the Risk of Flooding from Surface Water (RoFSW) mapping. RoFSW mapping was used by the applicant as a proxy to understand fluvial flood risk from smaller ordinary watercourses due to the lack of information available. The EA considered that the assessment was proportionate. To address any uncertainty arising from the assessment the EA requested from the applicant a commitment to ensure 0.6m freeboard above the design flood event for any solar PV panels placed in areas of flood risk. <u>The LLFA:</u> 1) Considering your response to ExQ1 FHW1.5 [REP3-142] and the EA conclusions, can you please confirm agreement or otherwise with the EA conclusions regarding the Manning calculations and freeboard allowance commitment? The LLFA notes the Environment Agency's conclusions that, despite recognised limitations, the Manning calculations were useful in providing context	panels, rather than only the sensitive electrical equipment, will be set no less than 600 mm above the design flood level including the applicable climate change allowance. Avoidance through micro-siting remains the preferred approach. This commitment is reflected within the revised Lime Down D Flood Risk Assessment and Drainage Strategy [REP5-055], Lime Down E2 Flood Risk Assessment and Drainage Strategy [REP5-059] and the Design Principles and Parameters [REP4-043]. The final panel arrangement may use micro-siting and adjustment of panel tilt or tracker operating range to achieve the required freeboard while remaining within the assessed maximum design parameters. The Environment Agency confirmed at the meeting on 28 July 2026 that the clarification provided regarding the lowest leading edge addressed its concern. The Applicant therefore considers that the LLFA's response provides further support for the proportionality of the assessment methodology and the adequacy of the secured 600 mm freeboard measure.

ExQ2	Question to:	Question:	Applicant's Response
		to the Risk of Flooding from Surface Water (RoFSW) mapping and that the resulting assessment was proportionate for smaller ordinary watercourses and drainage ditches not covered by detailed flood mapping. The LLFA also notes the EA's conclusion that the RoFSW dataset provides a reasonable proxy for understanding fluvial flood risk in these circumstances. The LLFA broadly agrees with the Environment Agency's conclusions regarding the use of the Manning calculations. The calculations were not intended to function as a detailed hydraulic model and, in isolation, would not provide a robust basis for defining flood risk. However, when used as a comparative exercise to contextualise the RoFSW mapping and understand the sensitivity of water levels to increased flows, the approach is considered proportionate for the smaller ordinary watercourses where more detailed data is unavailable.	

ExQ2	Question to:	Question:	Applicant's Response
		The LLFA also agrees that uncertainty remains in both the Manning calculations and the use of RoFSW mapping as a proxy for fluvial flood risk. Consequently, the proposed commitment to maintain a minimum freeboard allowance of 600 mm above the design flood level for solar PV panels located within areas of flood risk is a reasonable and proportionate mitigation measure that would provide an additional factor of safety. However, the LLFA considers that the freeboard commitment should not be regarded as a substitute for site-specific flood risk assessment where more detailed information is available or where infrastructure is proposed in close proximity to watercourses. The freeboard allowance addresses residual uncertainty in flood levels but does not, by itself, demonstrate that flood conveyance, flow routes, floodplain function and watercourse management considerations have been adequately addressed.	

ExQ2	Question to:	Question:	Applicant's Response
		Subject to the freeboard commitment being secured through the final design and relevant management plans, the LLFA therefore agrees in principle with the Environment Agency's conclusions regarding the proportionality of the Manning calculation assessment and the appropriateness of the proposed 600 mm freeboard allowance. Applicant's note: <i>The Applicant has not reproduced the remainder of the ExA's question in this table, as WC's submission does not provide a response to that part of the question.</i>	
FHW2.6a	The Lead Local Flood Authority	Flood Risk Management – Cable Route The ExA notes the LLFA's response to ExQ1 FHW1.6 [REP3-142] which requests further detail secured through method statements such as HDD, trenching controls, and drainage management plans. The SoCG [REP4-061] shows that Wiltshire Council is still negotiating with the applicant HDD commitments and HDD approval. The LLFA provided a helpful update at deadline 4 [REP4-091] showing	The Applicant welcomes the LLFA's acknowledgement of the additional information and commitments provided in relation to the Cable Route Corridor, including water management, temporary drainage, sediment control and the identification, protection and reinstatement of agricultural field drainage. The construction-phase implementation, monitoring and governance arrangements associated with these controls, including the role and scope of the Water Management Plan, are addressed comprehensively in

ExQ2	Question to:	Question:	Applicant's Response
		the residual themes that need to be addressed and the overall position. However, this document does not in not include specific references to HDD, trenching controls and drainage management plans in relation to hydrology. The ExA notes the applicant's response [REP4-081] which refers to pre-construction surveys, addressing issues through the Water Management Plan (WMP), which is part of the oCEMP and the outline Soil Resources Management Plan (oSRMP). The applicant made changes to Table 5 of the oCEMP [REP4-049] to include the protection of agricultural field drains (although a question about that has been put to the applicant in ExQ2 CA2.8(4). Can the LLFA please provide an update on this issue? The LLFA notes the additional information submitted by the applicant since its response to ExQ1 FHW1.6, including updates to the Outline Construction Environmental Management Plan (oCEMP), the Outline Soil	the Applicant's response to DCO2.1y above and are not repeated here.

ExQ2	Question to:	Question:	Applicant's Response
		Resources Management Plan (oSRMP), the Watercourse Crossing Schedule and the Applicant's responses to Deadline 3 submissions. The Applicant has introduced additional commitments relating to the identification, protection and reinstatement of agricultural field drains, water management during construction, temporary drainage arrangements, sediment control and watercourse crossing controls. The Applicant has also confirmed that a Water Management Plan (WMP) will form part of the detailed CEMP and that existing field drains encountered during construction will be recorded and reinstated, diverted or otherwise made good to maintain their hydraulic function.	
FHW2.6b	The Lead Local Flood Authority	In relation to trenching controls and drainage management plans, the LLFA recognises that further detail has now been incorporated into the oCEMP. Table 5 includes commitments regarding temporary drainage, sediment control, protection of land drains, reinstatement of disturbed drainage infrastructure, management of construction runoff, water quality monitoring and	The Applicant welcomes the LLFA's acknowledgement that the Outline CEMP [REP5-071] now provides the relevant controls for temporary drainage, sediment management, field drainage, construction runoff, water quality monitoring and the Water Management Plan. The detailed operation of the Water Management Plan, including monitoring, inspection, intervention, reporting and corrective-action arrangements, is addressed

ExQ2	Question to:	Question:	Applicant's Response
		preparation of a Water Management Plan. The oCEMP also states that the Water Management Plan will set out temporary drainage arrangements, watercourse crossing controls, riparian buffer protection measures and groundwater management provisions applicable to the construction phase.	comprehensively in the Applicant's response to DCO2.1y above and is not repeated here.
FHW2.6c	The Lead Local Flood Authority	The LLFA also notes that the applicant has committed to undertaking pre-construction surveys to identify field drainage systems and has stated that where field drains are disturbed by cable installation works they will be reinstated, diverted or otherwise repaired following construction to maintain drainage function. Similar commitments are included within both the oCEMP and the applicant's response to LLFA Comment WC-053.	The Applicant welcomes the LLFA's acknowledgement of the commitments relating to agricultural field drainage. As secured through the Outline CEMP [REP5-071], existing agricultural field drains identified in consultation with landowners before the relevant works, or encountered during cable installation, will be recorded. Where disturbed, they will be reinstated, diverted or otherwise made good following completion of the relevant works so as to maintain the affected field drainage function. The Applicant therefore considers that the identification, protection and reinstatement of agricultural field drainage are appropriately secured.

ExQ2	Question to:	Question:	Applicant's Response
FHW2.6d	The Lead Local Flood Authority	In relation to HDD, the position is less advanced. Whilst the Applicant has included further commitments within the oCEMP regarding HDD working methods, launch and reception pit locations, drilling fluid management, breakout contingency arrangements, pollution prevention measures and the potential use of trenchless techniques at sensitive crossings, discussions regarding HDD commitments and HDD approval mechanisms remain ongoing through the Statement of Common Ground process. The LLFA therefore considers that this aspect is not yet fully resolved.	The Applicant notes the LLFA's acknowledgement of the additional controls now provided for HDD and other trenchless works. The remaining matters regarding the selection of crossing methodologies and the associated approval framework are addressed at paragraphs 3.7.9 and 3.7.10 of the Statement of Common Ground with Wiltshire Council [REP5-087]. The Scheme adopts a proportionate crossing strategy. Trenchless techniques, including HDD, are prioritised at Main River crossings and other identified sensitive locations where avoiding direct disturbance to the channel, banks, floodplain or other sensitive receptors is appropriate. Open-cut techniques may be used for minor Ordinary Watercourses and drainage features where site-specific conditions demonstrate that the crossing can be undertaken without material effects on flood risk, drainage or the water environment. The relevant crossings and indicative methodologies are identified through the Watercourse Crossing Schedule [REP3-122] and associated mapping [REP3-139]. The final methodology for each crossing will be confirmed through detailed design having regard to environmental sensitivity, ground and groundwater

ExQ2	Question to:	Question:	Applicant's Response
			conditions, engineering requirements and the applicable regulatory controls. Where HDD or other trenchless techniques are used, crossing-specific controls will include detailed method statements, drilling fluid management, breakout contingency procedures, pollution prevention measures and, where required by the sensitivity of the groundwater environment, proportionate hydrogeological assessment. These commitments are already reflected within the secured management framework and Commitments Register. Detailed crossing design and construction methodology will be controlled through the detailed CEMP and associated method statements, together with the relevant drainage authority or Environment Agency approval mechanisms where applicable. The Applicant therefore considers that the existing DCO and management-plan framework provides appropriate control of sensitive crossings without the need for a separate bespoke HDD approval Requirement.
FHW2.6e	The Lead Local Flood Authority	Overall, the LLFA considers that progress has been made since ExQ1 FHW1.6 and that the Applicant has provided additional information and commitments regarding trenching controls,	The Applicant welcomes the LLFA's acknowledgement that progress has been made since ExQ1 FHW1.6 in relation to trenching controls, drainage management and the protection and reinstatement of field drainage systems.

ExQ2	Question to:	Question:	Applicant's Response
		drainage management and protection of field drainage systems. However, it remains important that the final drafting of the Water Management Plan requirements, HDD commitments, approval mechanisms, and measures for protection and reinstatement of drainage infrastructure provide sufficient certainty that existing drainage systems, watercourses and flow pathways will be protected throughout construction. Consequently, whilst the issue has progressed, the LLFA does not currently consider all matters arising from ExQ1 FHW1.6 to be fully resolved.	The matters concerning the Water Management Plan and construction-phase drainage assurance are addressed comprehensively in the Applicant's response to DCO2.1y above. Agricultural field drainage is addressed at FHW2.6c and the remaining HDD and crossing-approval matters are addressed at FHW2.6d. Those responses are not repeated here. Taken together, the Outline CEMP [REP5-071], Watercourse Crossing Schedule [REP3-122], detailed CEMP and Water Management Plan provide the framework necessary to protect existing drainage systems, watercourses and surface water flow pathways throughout construction. The Applicant therefore considers that the matters identified by the LLFA are appropriately addressed through the secured construction management and detailed design process.
FHW2.7	The Environment Agency The Lead Local Flood Authority	Construction – Impacts on Flood Risk and Drainage The EA requests in [REP4-097] (issue EA-051) a commitment to placing all construction compounds, material storage and plant outside of flood zone 3b and more detail about the mitigation	The Applicant welcomes the LLFA's confirmation that the remaining matters relate principally to construction-phase assurance, monitoring and implementation and that no additional standalone flood risk assessment or significant redesign is required. The Applicant has comprehensively addressed the construction-phase drainage, Water Management Plan, monitoring, intervention, reporting, corrective-

ExQ2	Question to:	Question:	Applicant's Response
		to be implemented if compounds need to be located within the floodplain. The LLFA in [REP4-091] identifies the following issues as hydrology matters currently unresolved (noting that some of those issues can arise at other phases of the development, not just during construction): <i>94. whether temporary drainage and sediment control measures during construction will be sufficiently robust;</i> <i>95. whether watercourse buffers and low-lying drainage pathways will be protected in practice;</i> <i>96. whether site-specific hydrological sensitivities identified in the Lime Down A-E desk studies are translated into monitoring and management controls;</i> <i>97. whether monitoring arrangements include clear triggers, responsibilities, reporting and corrective actions.</i>	action and governance arrangements in its response to DCO2.1y above and does not repeat that response here. For completeness, the Outline CEMP [REP5-071] already requires construction compounds, material storage and stockpiles not to be located within Flood Zone 3b and, where practicable, to be located outside the 1 in 100-year flood extent. It also provides controls for temporary drainage, sediment management, watercourse buffers, overland flow routes, field drainage, monitoring and the preparation of the detailed Water Management Plan. The Water Management Plan will translate those secured principles into the phase and location-specific arrangements required for construction, including existing drainage features and overland flow routes, temporary drainage and runoff controls, exceedance routing, interaction with compounds, haul routes, stockpiles, excavations and watercourse crossings, and the measures required to maintain floodplain capacity and avoid diversion of flows towards sensitive receptors. The Applicant therefore considers that the matters identified by the LLFA are already addressed through the secured Outline CEMP [REP5-071] and the

ExQ2	Question to:	Question:	Applicant's Response
		The oCEMP [REP4-049] includes a commitment in Table 5 to locate materials and compounds outside flood zone 3b and there is reference to monitoring requirements. Some of the other issues raised (temporary drainage, buffers) are also included in Table 5 either as standalone or as part of the WMP. <u>The EA and the LLFA:</u> Can you provide any further wording that you require in the oCEMP or other dDCO documents to address the impacts of construction on flood risk and drainage? The LLFA notes that the Applicant has made progress in addressing construction-phase flood risk and drainage matters through revisions to the oCEMP, including commitments relating to temporary drainage, sediment management, watercourse buffer protection, construction runoff controls, field drain reinstatement, monitoring and preparation of a Water Management Plan. The LLFA also notes the commitment to locate construction compounds, plant and	detailed Water Management Plan framework, with the overarching monitoring and assurance arrangements set out in response to DCO2.1y. No further standalone flood risk assessment or additional construction-phase drainage document is considered necessary.

ExQ2	Question to:	Question:	Applicant's Response
		material storage outside Flood Zone 3b wherever practicable. The LLFA does not consider that additional flood risk assessment or significant redesign is required at this stage. However, greater certainty would be provided through further refinement of the oCEMP and Water Management Plan provisions to address: 98. measurable monitoring indicators for drainage, runoff, erosion and sediment control measures; 99. trigger thresholds requiring investigation, maintenance or remedial action; 100. clearly defined corrective actions; 101. monitoring, reporting and governance responsibilities; 102. protection of watercourse buffers, overland flow routes and low-	

ExQ2	Question to:	Question:	Applicant's Response
		lying drainage corridors during construction; 103. procedures for inspection, protection and reinstatement of field drainage systems affected by construction activities; and 104. adaptive management measures where monitoring identifies adverse trends or drainage performance issues. The LLFA also considers that the Water Management Plan should clearly identify: 105. existing drainage features and overland flow routes; 106. temporary drainage and runoff management measures; 107. exceedance flow routing arrangements; 108. interactions with compounds, haul routes,	

ExQ2	Question to:	Question:	Applicant's Response
		stockpiles, excavations and watercourse crossings; 109. protection of floodplain storage and flow routes; and 110. inspection, monitoring and reporting procedures throughout the construction period. The LLFA's remaining concerns are therefore principally related to assurance, monitoring and implementation rather than the overall drainage strategy. The LLFA considers that the matters identified above are capable of being resolved through further refinement of the oCEMP and Water Management Plan and do not require additional standalone flood risk assessments at this stage.	
FHW2.8a	The Applicant The Lead Local Flood Authority	Construction – Water Management Plan The applicant in its rebuttal to Wiltshire Council's response to ExQ1 FHW1.9 [REP4-081] indicates that <i>The Water Management Plan forming part of the detailed CEMP will provide the phase-specific construction</i>	The Applicant directs Wiltshire Council to its response given to FHW2.8 in the Applicant's Response to the Examining Authority's Second Written Questions [REP5-097]. The Applicant welcomes the LLFA's confirmation that, in principle, it is acceptable for water management to be secured through the environmental management

ExQ2	Question to:	Question:	Applicant's Response
	The Environment Agency Stop Lime Down	<i>drainage and exceedance arrangements. It will identify:</i> 111. <i>the existing drainage features and overland flow routes relevant to the construction phase;</i> 112. <i>the proposed temporary drainage and runoff controls;</i> 113. <i>the routing of flows exceeding the capacity of temporary drainage measures;</i> 114. <i>the interaction with compounds, haul routes, stockpiles, excavations and watercourse crossings; and</i> 115. <i>the measures required to maintain existing floodplain capacity and avoid diversion of flows towards sensitive receptors.</i> Some of the issues mentioned in the bullet points above are not included in the latest oCEMP [REP4-049].	plan framework rather than through a separate certified Water Management Plan. This is consistent with the Applicant's position set out in FHW2.8. The Applicant agrees that the role and scope of the water management provisions should be clear. However, consistent with FHW2.8, it does not consider that a single standalone Water Management Plan covering the full lifetime of the Scheme, or a separate approval mechanism for such a plan, is necessary or appropriate. The activities, risks and controls differ materially between construction, operation and decommissioning and are therefore most appropriately developed through the detailed management plan applicable to each phase. For construction, the Water Management Plan forming part of the detailed CEMP will provide the site and phase-specific arrangements for temporary drainage, runoff and sediment control, exceedance routing, water quality protection, interaction with compounds, haul routes, stockpiles, excavations and watercourse crossings, and the maintenance of existing floodplain capacity and drainage pathways. The detailed implementation, monitoring, inspection, intervention, reporting and corrective-action framework is

ExQ2	Question to:	Question:	Applicant's Response
		All parties: 1) Given that the WMP is going to be an important management plan for the duration of this project (and also referred to in the oOEMP and the outline Decommissioning Strategy (oDS)) is it still adequate that it is approved through these documents, rather than being a standalone certified document? The LLFA considers that, in principle, it is acceptable for the Water Management Plan (WMP) to be secured through the environmental management plan framework rather than as a separate certified document, provided that the Draft DCO clearly secures its preparation, approval, implementation and maintenance throughout the relevant phases of the Scheme. The LLFA notes that the Applicant has identified the WMP as the principal document through which construction-phase drainage, runoff management, exceedance routing, water quality protection and related controls will be developed.	addressed comprehensively in the Applicant's response to DCO2.1y above and is not repeated here. The same principle applies during operation and decommissioning. Water-management requirements appropriate to those phases will be developed through the detailed OEMP and Decommissioning Strategy respectively, allowing the controls to respond to the final design, operational arrangements and site conditions relevant at that time. A single lifetime WMP would either need to anticipate matters which cannot yet reasonably be defined or require repeated revision as the Scheme moves between phases. To provide the additional clarity sought by the ExA and LLFA, the Outline CEMP [REP5-071], Outline OEMP [REP5-073] and Outline Decommissioning Strategy [REP5-075] were updated at Deadline 5 to include dedicated explanation of the relevant phase-specific water-management arrangements and their relationship with the other environmental controls. Appropriate cross-references have also been incorporated into the Outline SRMP [REP5-077] and Outline EPMS [REP5-081], reflecting the relationship between water management, soil condition, erosion, sediment control and protection of watercourses and ecological receptors.

ExQ2	Question to:	Question:	Applicant's Response
		However, given the increasing reliance placed upon the WMP within the Applicant's responses and the role it is intended to perform across multiple environmental topics, the LLFA considers that its purpose and scope should be more clearly defined within the outline management plans.	The Applicant therefore maintains the position set out in FHW2.8 that water management does not require a separate certification or approval mechanism. The phase-specific approach provides a clearer and more practical means of securing the necessary controls through the existing DCO Requirements, while avoiding duplication between management plans.
FHW2.8b	The Applicant The Lead Local Flood Authority The Environment Agency Stop Lime Down	2) If so, should it not have more overt relevance within the oCEMP, oOEMP and the oDS, possibly through the addition of a standalone section which explains its purpose, contents and links with other management plans, instead of being embedded in Table 5 of the outline management plans? Yes. The LLFA considers that the WMP has evolved from a supporting construction drainage document into a key cross-cutting management plan affecting hydrology, flood risk, soils, ecology, water quality and environmental management. Whilst the WMP is currently referenced within mitigation tables and supporting text,	The Applicant agrees that the purpose, scope and relationship of the water-management provisions should be clearly identifiable within the relevant outline management plans. As explained in response to FHW2.8a above, this has now been addressed through the Deadline 5 revisions to the Outline CEMP [REP5-071], Outline OEMP [REP5-073] and Outline Decommissioning Strategy [REP5-075], which include dedicated explanation of the relevant phase-specific water-management arrangements, their purpose and their relationship with the wider environmental management framework. Cross-references have also been added to the Outline SRMP [REP5-077] and Outline EPMS [REP5-081]. The Applicant therefore considers that the additional transparency sought by the LLFA has been provided

ExQ2	Question to:	Question:	Applicant's Response
		the LLFA considers that greater clarity would be achieved through the inclusion of a dedicated section within the oCEMP, oOEMP and oDS which: 116. explains the purpose of the WMP; 117. identifies the matters it must address; 118. explains how it interfaces with other environmental management plans; 119. identifies responsibilities for implementation; and 120. identifies relevant monitoring, review and update arrangements. This would improve transparency and ensure a clear line of sight between the environmental assessments and the management measures intended to deliver them.	without the need to create a separate lifetime Water Management Plan.

ExQ2	Question to:	Question:	Applicant's Response
FHW2.8c	The Applicant The Lead Local Flood Authority The Environment Agency Stop Lime Down	3) If a separate WMP that covers the lifetime of the development is the best way forward, please give reasons why. Please also include information regarding the approval mechanism and consultees. The LLFA does not currently consider that a standalone certified WMP covering all phases of the Scheme is essential. The Applicant's management hierarchy already relies upon phase-specific plans, each secured under different requirements and approval mechanisms. Construction, operation and decommissioning activities present different water management risks and therefore may legitimately require different levels of detail and management controls. Nevertheless, the LLFA considers that a common framework could be beneficial. Whether delivered through a standalone WMP or through linked phase-specific WMPs, the framework should address:	The Applicant welcomes the LLFA's confirmation that a standalone certified Water Management Plan covering all phases of the Scheme is not considered essential and that retaining water management within the existing phase-specific environmental management framework is acceptable. The Applicant's reasons for adopting that approach are set out in response to FHW2.8a above and are not repeated here. In summary, construction, operation and decommissioning present materially different activities, risks and water-management requirements. It is therefore more effective for those controls to be developed and approved through the detailed CEMP, OEMP and Decommissioning Strategy applicable to the relevant phase, rather than through a single lifetime document which would necessarily require repeated revision. The common principles identified by the LLFA, including drainage and runoff management, exceedance routing, water quality protection, field drainage, watercourse protection, monitoring, reporting and corrective action, are already reflected within the secured management framework. The overarching construction-phase monitoring and assurance

ExQ2	Question to:	Question:	Applicant's Response
		121. drainage and runoff management; 122. exceedance flow routing; 123. water quality protection; 124. field drainage interactions; 125. watercourse protection; 126. monitoring arrangements; 127. governance and reporting procedures; and 128. adaptive management measures where monitoring identifies adverse outcomes. On balance, the LLFA considers that retaining the WMP within the existing environmental management framework is acceptable, provided its scope, purpose and links to other plans are more clearly articulated and secured.	arrangements are addressed comprehensively in the Applicant's response to DCO2.1y above. The Applicant therefore considers that the parties are aligned on the principle that a separate lifetime WMP is not required.

ExQ2	Question to:	Question:	Applicant's Response
FHW2.8d	The Applicant The Lead Local Flood Authority The Environment Agency Stop Lime Down	4) As water management will be key for other topics such as soil and ecology, should it also be referenced in the oSRMP, oEPMS and other outline management plans/strategies? If so, please set out which ones and the reasons why. The LLFA considers that the Water Management Plan (WMP) should be more clearly integrated throughout the suite of outline management plans and strategies. The LLFA considers that the WMP has evolved into a key cross-cutting document that supports the delivery of hydrology, flood risk, drainage, soil, ecological and landscape mitigation measures across multiple phases of the Scheme. Consequently, reliance solely on cross-references within mitigation tables may not provide sufficient clarity regarding the purpose of the WMP, its scope or its relationship with other management plans. Whilst additional cross-referencing would be beneficial, the LLFA considers that dedicated Water Management Plan sections within the relevant management plans would provide	The Applicant agrees that the relationship between water management and the other environmental disciplines should be clear. As explained in response to FHW2.8b above, the Deadline 5 revisions provide dedicated explanation of the phase-specific water-management arrangements within the Outline CEMP [REP5-071], Outline OEMP [REP5-073] and Outline Decommissioning Strategy [REP5-075]. The Applicant has also strengthened the links with the specialist management plans. Appropriate cross-references have been incorporated within the Outline SRMP [REP5-077] and Outline EPMS [REP5-081] to identify the relationship between water management, soil condition, erosion, sediment control and the protection of watercourses and ecological receptors. The Applicant does not consider that a dedicated WMP section needs to be duplicated within every specialist management plan. The relevant specialist controls should remain within the plan responsible for their implementation, with appropriate cross-referencing providing the necessary integration without creating overlapping or potentially inconsistent requirements. The relationship between the measures is also

ExQ2	Question to:	Question:	Applicant's Response
		greater transparency and demonstrate how water-related controls are intended to operate alongside other environmental mitigation measures. These sections should explain the purpose of the WMP, the matters it is intended to address, its relationship with the relevant management plan, and any associated implementation, monitoring and review arrangements.	consolidated through the Mitigation Route Map [REP5-102] .
FHW2.8e	The Applicant The Lead Local Flood Authority The Environment Agency Stop Lime Down	The LLFA considers that dedicated WMP sections would be beneficial within the following documents: 1) Outline Construction Environmental Management Plan (oCEMP) The WMP is intended to be the principal mechanism for managing construction-phase drainage, temporary runoff controls, exceedance routing, field drain protection, watercourse crossings, sediment management, pollution prevention and water quality protection. A dedicated section would provide a clear explanation of how these controls will be coordinated and delivered during construction.	The Applicant agrees that the detailed CEMP is the principal mechanism for construction-phase water management. As set out in responses to FHW2.8a and FHW2.8b above, Table 5 of the Outline CEMP [REP5-071] has been updated at Deadline 5 to provide dedicated explanation of the construction-phase water-management arrangements and their relationship with the wider environmental controls. The detailed implementation, monitoring, inspection, reporting and corrective-action framework is addressed comprehensively in the Applicant's response to DCO2.1y above and is not repeated here.

ExQ2	Question to:	Question:	Applicant's Response
FHW2.8f	The Applicant The Lead Local Flood Authority The Environment Agency Stop Lime Down	2) Outline Operational Environmental Management Plan (oOEMP) The oOEMP already relies on the WMP in relation to operational water quality monitoring, drainage management, flood resilience measures, SuDS maintenance and post-flood inspections. A dedicated section would provide greater clarity regarding how operational water management will be implemented, monitored and reviewed throughout the operational life of the Scheme.	The Applicant agrees that operational water management should be clearly identifiable within the operational management framework. As set out in response to FHW2.8b above, the Outline OEMP [REP5-073] has been updated at Deadline 5 to provide dedicated explanation of the operational water-management arrangements and their relationship with drainage management, water quality monitoring, flood resilience and inspection and maintenance requirements. The operational monitoring and intervention framework is addressed in the Applicant's response to DCO2.1ae above and is not repeated here.
FHW2.8g	The Applicant The Lead Local Flood Authority The Environment Agency Stop Lime Down	3) Outline Decommissioning Strategy (oDS) Decommissioning activities have the potential to generate similar water management risks to construction activities, including temporary drainage, runoff management, erosion, sediment transport, field drain interactions and protection of watercourses. A dedicated section would help ensure consistent application of water management principles during decommissioning.	The Applicant agrees that decommissioning requires appropriate phase-specific water-management controls. As set out in response to FHW2.8b above, the Outline Decommissioning Strategy [REP5-075] has been updated at Deadline 5 to provide dedicated explanation of the decommissioning water-management arrangements. The decommissioning framework applies equivalent principles to construction, including temporary drainage, runoff and sediment management, protection

ExQ2	Question to:	Question:	Applicant's Response
			of watercourses, pollution prevention, inspection and water quality monitoring, while allowing the detailed measures to respond to the decommissioning activities and site conditions applicable at that time.
FHW2.8h	The Applicant The Lead Local Flood Authority The Environment Agency Stop Lime Down	4) Outline Soil Resources Management Plan (oSRMP) The oSRMP contains measures relating to soil moisture conditions, compaction avoidance, infiltration, erosion control, soil reinstatement and protection of field drainage systems. These matters are intrinsically linked to water management and drainage performance. A dedicated section would help demonstrate how soil management and water management measures work together to maintain soil structure, permeability and hydrological function.	The principal aim of the Outline SRMP [REP5-077] is to prevent or minimise damage to the soil resources which encompasses maintenance of soil structures and avoidance (or remediation where necessary) of soil compaction. ES Volume 3 Appendix 17-1 Agricultural Land Classification and Soil Resources Survey Report [REP3-067] details the two predominant soil types across the Solar PV Sites, one being slowly permeable clay. The soil is not naturally freely draining; measures in the Outline SRMP [REP5-077] cannot increase the soil permeability across undisturbed land. The inherent hydrological properties of the soils are not anticipated to change. The Applicant agrees that soil condition and water management are related, particularly where soil disturbance or compaction has the potential to influence infiltration, erosion or surface water runoff. The Outline SRMP [REP5-077] provides the specialist framework for protecting soil structure, avoiding and remediating compaction and managing soils affected

ExQ2	Question to:	Question:	Applicant's Response
			by construction, operation and decommissioning. It has been updated to clarify its relationship with surface water runoff and the Flood Risk Assessment and Drainage Strategy suite [REP5-047 to REP5-060], and appropriate cross-reference to the water-management framework has been provided. The Applicant does not consider that a separate dedicated WMP section within the SRMP would provide additional control. The purpose of the SRMP is to manage soil resources, while the phase-specific water-management plans address drainage and water management. Cross-referencing the two frameworks provides the necessary integration while retaining clear responsibility for the respective controls. The Applicant also notes that the inherent hydrological characteristics of the underlying soils are not assumed to be altered by the Scheme. The purpose of the soil-management measures is to avoid deterioration of soil structure and hydrological function through activities such as trafficking and compaction, rather than to increase the natural permeability of the soil.
FHW2.8i	The Applicant	5) Outline Ecological Protection and Mitigation Strategy (oEPMS) and related ecological management documents	The Applicant agrees that water management is relevant to the protection of aquatic and riparian ecological receptors.

ExQ2	Question to:	Question:	Applicant's Response
	The Lead Local Flood Authority The Environment Agency Stop Lime Down	Water management is fundamental to protecting aquatic habitats, watercourses, riparian corridors, ponds, wetland features and other water-dependent ecological receptors. Runoff management, sediment control and water quality protection measures can directly influence the effectiveness of ecological mitigation and enhancement measures. A dedicated section would provide a clearer link between hydrological controls and ecological outcomes.	The relationship is already recognised within the Outline EPMS [REP5-081], including through controls relating to watercourse crossings, sediment release, drainage disruption and trenchless works. Appropriate cross-reference to the phase-specific water-management framework has also been incorporated through the Deadline 5 revisions. The Applicant does not consider that a further dedicated WMP section is necessary. The Environment Agency has similarly confirmed in its Deadline 5 response that water management is already adequately addressed within the Outline EPMS [REP5-081], including its provisions for rivers, streams, ditches and HDD works. The Applicant therefore considers that appropriate integration is achieved through complementary controls and cross-referencing without duplicating hydrology requirements within the ecological management documents.
FHW2.8j	The Applicant The Lead Local Flood Authority	Conclusion The LLFA is not seeking the preparation of additional standalone management plans. However, given the central role that the WMP is expected to play in managing runoff,	The Applicant welcomes the LLFA's confirmation that it is not seeking additional standalone management plans. The Applicant has addressed the LLFA's request for greater transparency through the Deadline 5 revisions

ExQ2	Question to:	Question:	Applicant's Response
	The Environment Agency Stop Lime Down	drainage, water quality, flood risk, soils and ecological receptors throughout the lifetime of the Scheme, the LLFA considers that dedicated Water Management Plan sections should be included within the oCEMP, oOEMP, oDS, oSRMP, oEPMS and oLEMP, supported by appropriate cross-referencing between documents. This would improve transparency, strengthen integration between environmental disciplines and provide greater confidence that water-related mitigation measures identified within the Environmental Statement will be delivered consistently throughout construction, operation and decommissioning of the Scheme.	described in responses FHW2.8a to FHW2.8i above. Dedicated phase-specific water-management explanation is provided within the Outline CEMP [REP5-071], Outline OEMP [REP5-073] and Outline Decommissioning Strategy [REP5-075], with appropriate cross-references incorporated within the specialist soil and ecological management documents. The Applicant considers this to be preferable to duplicating a dedicated WMP section across every management plan. It provides a clear line of sight between the assessment, phase-specific water-management controls and specialist mitigation while retaining the detailed requirements within the documents responsible for their implementation. The relationship between the hydrology, soil, vegetation and ecological measures, associated monitoring requirements and the mechanisms by which they are secured is also consolidated within the Mitigation Route Map [REP5-102]. The Applicant therefore considers that the integrated management framework provides the clarity sought by the LLFA without introducing additional or duplicative management requirements.

ExQ2	Question to:	Question:	Applicant's Response
FHW2.10a	The Lead Local Flood Authority	LLFA Residual Themes The LLFA in [REP4-091] identifies six unresolved residual themes but it considers them as capable of resolution through further discussion and refinement. These issues relate to: 129. the integration of hydrology-related controls across documents 130. vegetation monitoring as a runoff and erosion control measure 131. recognition of the hydrological function of vegetation and soils 132. soil compaction monitoring and remediation 133. construction-phase drainage and water management 134. long-term monitoring, governance and performance triggers.	The Applicant welcomes the LLFA's acknowledgement that progress has been made and that the remaining matters concern assurance, monitoring and implementation rather than a need for further engineering mitigation. The six residual themes identified by the LLFA have now been addressed through the Deadline 5 management-plan revisions and the wider secured management framework. In particular: • the integration of hydrology-related controls is consolidated through Table 3-5: Hydrology, Flood Risk and Drainage of the Mitigation Route Map [REP5-102], which identifies the mitigation relied upon, associated monitoring requirements and the mechanism by which each measure is secured; • the construction-phase drainage, Water Management Plan, monitoring, intervention, reporting and corrective-action framework is addressed comprehensively in the Applicant's response to DCO2.1y above; • the corresponding operational framework, including monitoring of drainage infrastructure, soils, vegetation and runoff-related indicators, is

ExQ2	Question to:	Question:	Applicant's Response
		1) Considering the information submitted by the applicant at deadline 4, can you please provide an update on the residual themes at deadline 5? The LLFA notes that the applicant has made progress in addressing the concerns raised at Deadline 4 through revisions to the oCEMP, oOEMP, oSRMP, ES Chapter 11 and supporting responses. In particular, additional commitments have been included relating to water management, drainage controls, soil management, monitoring, vegetation establishment, field drain protection and post-construction management arrangements. Accordingly, the LLFA considers that its concerns have been partly addressed. However, the LLFA considers that several residual matters remain outstanding. These principally relate to: • measurable performance indicators; • intervention thresholds; • defined corrective actions;	addressed in the Applicant's response to DCO2.1ae above; and • the specific relationship between vegetation, soil condition and hydrological performance is addressed in the Applicant's responses to DCO2.1am and the associated soil-management matters above. The Applicant therefore considers that the remaining themes identified by the LLFA are now addressed through a combination of measure-specific monitoring within the relevant specialist plans and the overarching governance and corrective-action framework. The Mitigation Route Map [REP5-102] provides the consolidated audit trail requested by the LLFA without duplicating the same controls across multiple management plans. The Applicant does not consider that maintaining the residual flood risk conclusions requires universal numerical performance thresholds across all drainage features, soils and vegetation types. The appropriate indicator and intervention response depends upon the mechanism being monitored, with engineered drainage assessed against its intended function, soil condition through the SRMP framework and vegetation and erosion through observable changes relevant to runoff

ExQ2	Question to:	Question:	Applicant's Response
		• reporting arrangements; • governance responsibilities; • adaptive management mechanisms; and • consolidation of relevant commitments into a clear and coherent assurance framework. The LLFA's position is not that further engineering mitigation is necessarily required. Rather, additional clarity is sought regarding how the effectiveness of the proposed non-structural SuDS and land management measures will be monitored, assessed and maintained throughout the operational life of the Scheme. These are the elements that would provide confidence that the residual flood risk effects identified within the Flood Risk Assessment remain Negligible to Low throughout the lifetime of the Scheme. The LLFA nevertheless considers that these matters are capable of resolution through further discussion and refinement of the relevant management plans, monitoring and	behaviour. The detailed approach is set out in DCO2.1y and DCO2.1ae and is not repeated here.

ExQ2	Question to:	Question:	Applicant's Response
		governance arrangements, and secured commitments.	
FHW2.10b	The Lead Local Flood Authority	2) If any further wording is needed in the environmental management plans to resolve these issues, can you please include it in your response, including the document and the wording required? The management plans are secured through the Draft DCO; however, the LLFA considers that further refinement of the outline plans would provide greater certainty regarding performance indicators, intervention thresholds, corrective actions, governance arrangements and adaptive management measures necessary to demonstrate that residual flood risk effects remain Negligible to Low throughout the operational life of the Scheme. The LLFA considers that the OEMP, Water Management Plan and SRMP should be updated to: 135. identify measurable performance indicators relevant to	The Applicant has substantively addressed the LLFA's requested monitoring, intervention, corrective-action, reporting, governance and adaptive-management arrangements in its responses to DCO2.1y and DCO2.1ae above and does not repeat those arrangements here. The Outline CEMP [REP5-071], Outline OEMP [REP5-073] and Outline SRMP [REP5-077] provide the relevant phase and measure-specific controls, while the Mitigation Route Map [REP5-102] identifies how those controls collectively secure the hydrology, flood risk and drainage mitigation relied upon by the assessment. The Applicant therefore does not consider that further generic wording imposing common numerical performance indicators or intervention thresholds across the management plans is necessary or appropriate. The secured framework establishes the matters requiring monitoring, responsible parties, reporting and review processes and the requirement for proportionate corrective action where deterioration or non-compliance is identified. Detailed parameters and intervention criteria can then respond

ExQ2	Question to:	Question:	Applicant's Response
		hydrology, drainage, soils and vegetation management; 136. define intervention thresholds requiring investigation or remedial action; 137. identify appropriate corrective actions; 138. clearly define monitoring, reporting and governance responsibilities; and 139. establish an adaptive management process for responding to adverse trends identified through monitoring. The LLFA considers that provisions of this nature would likely address the remaining residual themes identified at Deadline 4.	appropriately to the particular activity, receptor, final design and observed site condition. The Applicant considers that this provides the assurance framework sought by the LLFA and addresses the residual themes identified at Deadline 4.
FHW2.13	The Applicant The Lead Local Flood Authority	Ordinary Watercourse Consent and Environmental Permitting The ExA in EXQ1 FHW1.19 requested the views of the LLFA regarding Articles 6 and 17 and Schedule 15, Part 9 provisions of	The Applicant welcomes the LLFA's confirmation that the amendment to Article 17 substantially addresses the concern raised in response to ExQ1 FHW1.19 and that no further amendment to the dDCO is sought in relation to this matter.

ExQ2	Question to:	Question:	Applicant's Response
		the dDCO in relation to ordinary watercourse consent and environmental permitting. The LLFA provided a response [REP3-142] asking for amendments to Article 17 to make clear that, where the relevant watercourse, public sewer or drain falls within the drainage-authority regime, Part 9 governs the approval process instead of the generic Article 17(3) and (4) mechanism. That would avoid parallel approval regimes following DCOs already consented for other solar schemes. The applicant's response [REP4-081] was to reject the proposed changes to Part 9 provisions and accept the proposed changes to Article 17. The applicant added the LLFA proposed wording as 17(4) of the dDCO [REP4-004] to read: <i>Where the undertaker discharges water into, or makes any opening into, a watercourse, public sewer or drain belonging to or under the control of a drainage authority, the provisions of Part 9 of Schedule 15 (protective provisions) apply in substitution for the provisions of paragraphs (3) and (4).</i>	The Applicant also agrees that the matter should be recorded within the Statement of Common Ground. This has now been addressed at paragraph 3.7.26 of the Statement of Common Ground with Wiltshire Council [REP5-087] updated at Deadline 5, where the parties record an agreed position that the revised Article 17 appropriately clarifies the relationship between the discharge powers in Article 17 and the approval process under Part 9 of Schedule 15 and avoids unnecessary duplication between approval mechanisms. The parties also agree there that the dDCO does not remove or replace any separate statutory consent or permitting requirements which remain applicable outside the DCO process. The Applicant therefore considers this matter resolved.

ExQ2	Question to:	Question:	Applicant's Response
		The SoCG between the applicant and Wiltshire Council [REP4-061] does not include reference to these issues so both parties are requested to provide an update on this issue and consider if it should be included in the SoCG. The LLFA notes that the Applicant has accepted the amendment proposed by the LLFA to Article 17 and that the wording has been incorporated into the draft DCO. The LLFA welcomes this amendment as it clarifies 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 approval mechanism contained within Article 17. The LLFA's principal concern in response to ExQ1 FHW1.19 was to avoid uncertainty and the potential for overlapping approval regimes where drainage authority interests are affected. The amendment to Article 17 provides clarity that the drainage authority protections contained within Part 9 of	

ExQ2	Question to:	Question:	Applicant's Response
		Schedule 15 take precedence in those circumstances. The LLFA considers that Article 17 and Part 9 of Schedule 15 perform different functions within the draft DCO. Article 17 facilitates the undertaking of drainage-related works, including discharges and openings into watercourses, sewers and drains, whereas Part 9 contains the specific protective provisions intended to safeguard the interests and statutory functions of drainage authorities. The amendment ensures that these provisions operate coherently where drainage authority assets are affected. Whilst the Applicant did not accept the LLFA's proposed amendments to Part 9 of Schedule 15, the LLFA considers that the amendment to Article 17 substantially addresses the concern raised in its response to ExQ1 FHW1.19. The LLFA therefore does not seek further amendments to the draft DCO in relation to this matter at this stage. The LLFA further notes that the amendment does not remove or alter any separate	

ExQ2	Question to:	Question:	Applicant's Response
		statutory consenting or permitting requirements that may apply to the authorised development. Any requirement for Ordinary Watercourse Consent, Environmental Permits or other regulatory approvals would continue to be determined by the relevant competent authority in accordance with the applicable legislative framework. The LLFA agrees that this matter should be reflected within the Statement of Common Ground so that the agreed position is clearly recorded. Subject to the inclusion of an appropriate SoCG entry recording agreement on the Article 17 amendment, the LLFA considers this issue to be substantially resolved.	
General and Cross-Topic Questions (GCT)			
GCT2.6	The Applicant Wiltshire Council	Outline Operational Environmental Management Plan (oOEMP) At ISH4, around the discussion of the definition of 'maintain' in the dDCO, the applicant was asked about whether reporting mechanisms should be included within	The Applicant directs the Council to the response to GCT2.6 of The Applicant's Response to the Examining Authority's Second Written Questions [REP5-097] confirming the Applicant's commitment to inform the LPA of any replacement of 10% or more of either BESS units or Solar PV Panels.

ExQ2	Question to:	Question:	Applicant's Response
		the oOEMP for when the anticipated wholesale replacement of the BESS units and solar PV panels take place; this is so that in 10 or so years' time when the BESS units are being replaced, or 30 to 40 years' time when the panels are being replaced, the local planning authority is notified. Taking this slightly further, the ExA considers that there may be some merit in a reporting mechanism for when 10% or more of those components are replaced at any one time (noting that malfunctioning or damage could occur well in advance of anticipated wholesale replacement timescales). The applicant at ISH4 stated that it would be open to adding something into the oOEMP regarding a reporting mechanism, but nothing was included in Revision 5 of the oOEMP [REP4-051]. The ExA considers that reporting mechanisms for replacement activities (excluding routine maintenance) can help local planning authorities to deal with queries from local communities when more than routine maintenance is occurring on the sites and communities are in the dark about what is taking place on the sites.	

ExQ2	Question to:	Question:	Applicant's Response
		The applicant and Wilshire Council are therefore requested to consider what form of drafting could capture a reporting mechanism in the oOEMP for the wholesale replacement period of the BESS units and solar PV panels, and whether further reporting terms should be added for a much smaller replacement exercise (e.g. 10% of the components) but excluding routine maintenance. The council considers that the ExA's suggestion for inclusion of a reporting mechanism in the oOEMP which covered both wholesale and smaller replacement exercises of the BESS units and solar PV panels would be helpful. The LPA is regularly contacted by members of the public in response to activities that do not require planning permission or other pre-agreement with the council, and there is no knowledge or forewarning about. Given the level of public interest in this scheme, notification is considered warranted. The council also considers that notification would help align replacement activities with	

ExQ2	Question to:	Question:	Applicant's Response
		the Innovation Forum, to ensure that any relevant advances in technology and / or practices could be utilised. The council is aware that the Applicant will be updating the oOEMP to include the linkage between replacement activities and the Innovation Forum, so will review and comment on the Applicant's proposed additions once available to ensure that the requirement for the reporting of replacement activity is also sufficiently addressed.	
Health and Wellbeing (HW)			
HW2.1a	The Applicant Wiltshire Council Stop Lime Down	Mental Wellbeing Stop Lime Down, in its comments on the applicant's responses to ExQ1 HW1.1 and HW1.3 [REP4-132], expressed concern that the applicant had not adequately addressed the potential mental health impacts associated with the proposed development. It requested further information on a communications strategy demonstrating how the recommendations contained within Suffolk County Council's <i>Energy and Climate Adaptive Infrastructure Policy: Community</i>	The Applicant refers to its own response to HW2.1 in the Applicant's Response to the Examining Authority's Second Written Questions [REP5-097]. The Applicant confirms that discussions with Wiltshire Council regarding the Terms of Reference (ToR) for both the Community Liaison Group (CLG) and the wider communication strategy are active and ongoing. In fulfilment of this, the Applicant provided an example ToR to the Council on 4 August 2026 to serve as a baseline for further refinement, with a list of draft

ExQ2	Question to:	Question:	Applicant's Response
		<i>Engagement and Wellbeing Supplementary Guidance Document (SGD)</i> have been considered and incorporated into the applicant's approach. The ExA acknowledges the sensitivity of this matter and recognises the efforts made by the applicant to engage with mental health providers within and around the Order limits to mitigate potential mental health impacts. Nevertheless, the ExA considers that the SGD contains guidance of relevance to the post-consent phase and that its recommendations could usefully inform the development of a clear and structured communications strategy. This may have implications for the applicant's response to ExQ SE2.9, particularly in relation to the proposed role and function of the Community Liaison Group (CLG). <u>Wiltshire Council and Stop Lime Down:</u> In its response to ExQ1 HW1.1, the applicant questioned the appropriateness of relying on the SGD on the basis that it is not specifically directed at the post-consent stage. The applicant requested that Wiltshire Council	additions to the ToR set out based on the discussions and representations made to date. The Applicant acknowledges the Council's recommendation to apply the principles of the Suffolk Supplementary Guidance Document (SGD) to the post-consent phase where relevant and appropriate principles from this guidance can be applied the CLG's ToR. . The CLG's role will include signposting the public to mental health resources provided by the Council's Public Health Team. As agreed with Wiltshire Council's Public Health team, early engagement with the CLG is proposed through providing information on the role of the CLG on the Lime Down project website and inviting prospective members to register their interest during the decision-making phase of the DCO application (following the close of examination). Furthermore, cross-engagement and information sharing between the CLG and Community Benefit Fund administrators will be utilised to ensure funded community enhancements reflect local ambitions without given additional responsibilities to CLG members.

ExQ2	Question to:	Question:	Applicant's Response
		identify those elements of the SGD it considers most relevant to the development of a communications strategy. 1) Wiltshire Council and Stop Lime Down are therefore invited to identify the specific recommendations or principles within the SGD that they consider applicable to the post-consent phase and explain how these should be reflected within a communications strategy for Lime Down. Responses should also clarify their expectations regarding the purpose, scope and delivery of that strategy. Discussions with the Applicant regarding the Terms of Reference (ToR) for the communication strategy and the Community Liaison Group are ongoing. Following the most recent meeting on 28 July 2026, a commitment was made by the Applicant to provide a draft ToR for the CLG at the earliest opportunity to maximise benefit and engagement with community groups. Whilst the points below set out the expectations of the council, it is felt that any draft communications strategy would need the input of the local community to ensure it	

ExQ2	Question to:	Question:	Applicant's Response
		captures the views of all relevant stakeholders. Wiltshire Council considers that the following principles of the Suffolk SGD are applicable in the post consent phase. Collectively, these measures should ensure that the Communication Strategy and CLG support transparency, inclusion, participation, trust and community resilience, helping communities to retain a sense of control and influence throughout the post-consent and scheme delivery phases and thereby contributing to the safeguarding of mental health and wellbeing. The strategy should provide a framework to facilitate effective communication, consultation, and collaboration between the project team and the local community and stakeholders. 140. Early and continuous engagement. This should be delivered through a programme of regular communications, scheduled CLG meetings and ongoing opportunities for dialogue throughout the post-	

ExQ2	Question to:	Question:	Applicant's Response
		consent, construction, operation and decommissioning phases. 141. Comprehensive and honest engagement. This should be delivered through timely publication of accurate, accessible and transparent information regarding project impacts, construction activities, constraints and decision-making processes. 142. Clear explanation of process and timelines. This should be delivered through published engagement plans, construction updates, project programmes and clear reporting to the CLG on upcoming activities and milestones. 143. Genuine opportunities to influence outcomes. This should be delivered through the CLG providing a structured forum for community representatives to discuss mitigation, construction management measures and other matters where community feedback can inform project delivery. The council considers that this should	

ExQ2	Question to:	Question:	Applicant's Response
		also extend to the CLG being afforded the opportunity to provide feedback and genuinely influence the detailed design and management plans prior to applications for discharge being made to the LPA. 144. Building trust, confidence and mutual understanding. This should be delivered through regular face-to-face engagement, continuity of project representatives, responsiveness to community concerns and transparent reporting of actions taken. 145. Effective dialogue and conflict resolution. This should be delivered through agreed protocols for engagement, clear routes for raising concerns, constructive discussion at CLG meetings and escalation procedures where issues remain unresolved. 146. Regular in-person presence and accessible support. This should be delivered through community drop-in events, attendance at local	

ExQ2	Question to:	Question:	Applicant's Response
		meetings, dedicated points of contact, accessible communication channels and provision of practical support where appropriate. 147. Responsiveness to community concerns. This should be delivered through a clear feedback, complaints and grievance procedure, with responses and resulting actions communicated to both the CLG and the wider community. 148. Supporting community identity and assets. This should be delivered through ongoing engagement with communities to identify valued local assets, opportunities for enhancement, and appropriate mitigation measures that help maintain community cohesion, pride and sense of place. Identification and prioritisation of initiatives to be considered via the Community Benefit Fund (CBF) could also be included (although noting that the CLG would not be a decision-making forum or	

ExQ2	Question to:	Question:	Applicant's Response
		responsible for the assessment or overseeing of the CBF) 149. Ongoing wellbeing support. This should be delivered through signposting to relevant wellbeing services and resources, consideration of community wellbeing impacts in project communications, and periodic review through the CLG of emerging wellbeing concerns and mitigation measures. In summary, the council considers that post-consent engagement should be ongoing, collaborative and measurable, with the Applicant responsible for delivery and the Community Liaison Group (CLG) providing oversight and accountability. The key recommendations for a post-consent communications strategy are: 150. Maintain ongoing dialogue, not just one-way updates – engagement should continue through construction, operation and decommissioning, giving communities opportunities to raise	

ExQ2	Question to:	Question:	Applicant's Response
		concerns and influence matters where possible. 151. Establish a community liaison group – bringing together parish representatives, councillors, the Applicant, local authorities and key local stakeholders to discuss project delivery, mitigation and emerging issues. 152. Provide regular, accessible information – including clear timelines, face-to-face engagement, drop-in sessions and effective complaints procedures. 153. Maintain a visible local presence – through community liaison officers, attendance at parish meetings and local contact channels. 154. Monitor community wellbeing and satisfaction.	
HW2.1b	The Applicant	The Applicant, Wiltshire Council and Stop Lime Down: Having regard to Stop Lime Down's deadline 4 submission [REP4-132], the ExA invites comments on how a	The Applicant notes this comment and refers to their response in The Applicant's Response to the

ExQ2	Question to:	Question:	Applicant's Response
	Wiltshire Council Stop Lime Down	communications strategy informed by the SGD could be secured, implemented and monitored. In particular: 2) Should responsibility for overseeing or supporting delivery of the communications strategy form part of the CLG's role? If so, how could this be achieved in practice? The council considers that CLG should have a role in the communications strategy, but as an oversight and advisory body rather than delivering communications itself. The CLG is a forum for feedback and community engagement. Responsibility for delivering communications should remain with the Applicant. The CLG could: 155. Review implementation of the communications strategy. 156. Provide feedback on emerging community concerns.	Examining Authority's Second Written Questions [REP5-097] to ExQ HW2.1. The Applicant confirms that discussions in relation to the provision and operation of the CLG are ongoing, with all updates recorded through the Statement of Common Ground with Wiltshire Council [REP5-087].

ExQ2	Question to:	Question:	Applicant's Response
		157. Monitor complaints and engagement activity. 158. Hold the developer accountable for communications commitments.	
HW2.1c	The Applicant Wiltshire Council Stop Lime Down	3) How might such arrangements avoid placing additional burdens on volunteer representatives and Parish Councils? The SGD states that parish councillors frequently experience significant time pressures, difficulties in interpreting large volumes of technical material, and feelings of being overwhelmed by the responsibilities placed upon them during the NSIP process. It further notes that the burden of supporting communities often falls on a relatively small number of volunteers. The SGD highlights the potential value of a neutral chair or independent "relationship manager" to facilitate constructive dialogue between communities, local authorities and project promoters. Such an arrangement could help manage discussions, resolve misunderstandings and maintain productive	The Applicant notes this comment and refers to their response in The Applicant's Response to the Examining Authority's Second Written Questions [REP5-097] to ExQ HW2.1. The Applicant confirms that discussions in relation to the provision and operation of the CLG are ongoing, with all updates recorded through the Statement of Common Ground with Wiltshire Council [REP5-087].

ExQ2	Question to:	Question:	Applicant's Response
		relationships without relying on volunteers to undertake mediation or facilitation roles. The council notes that an Independent Chair for the Community Forum was secured by the Applicant in the A303 Stonehenge DCO scheme. The SGD also recommends that community representatives receive appropriate training and support to help them understand complex projects and fulfil their community-facing roles. It further recognises the need to avoid situations where volunteers feel isolated or overwhelmed. To avoid placing additional demands on volunteers: 159. The Applicant could provide secretariat and administrative support, including by appointing an independent chair. 160. Information should be concise and easy to understand in plain English.	

ExQ2	Question to:	Question:	Applicant's Response
		161. The CLG should meet only as often as necessary. 162. A dedicated community liaison officer employed by the Applicant should act as the primary point of contact. 163. Parish councils should not be expected to manage communications or technical issues on behalf of the project.	
HW2.1d	The Applicant Wiltshire Council Stop Lime Down	4) What mechanisms, if any, would be appropriate to secure implementation and monitoring of the strategy throughout the post-consent phase? In responding, parties should also have regard to ExQ2 SE2.9. Wiltshire Council and Stop Lime Down are welcome to provide comments on that question where relevant. The council considers that it is imperative that community engagement should continue beyond the construction phase and that the Community Liaison Group (CLG) should operate through the construction, operation, maintenance and decommissioning phases	The Applicant notes this comment and refers to their response in The Applicant's Response to the Examining Authority's Second Written Questions [REP5-097] to ExQ HW2.1. The Applicant confirms that discussions in relation to the provision and operation of the CLG are ongoing, with all updates recorded through the Statement of Common Ground with Wiltshire Council [REP5-087]. The Applicant confirms that the provision of a Stakeholder Communication Plan is secured through the Outline CEMP [REP5-071] (section 2.15) by Requirement 13 of Schedule 2 to the Draft DCO [REP5-012].

ExQ2	Question to:	Question:	Applicant's Response
		of the development. The Terms of Reference should clearly define the mechanisms of implementation and monitoring for the post consent phase. Appropriate mechanisms for the communication strategy could include: 164. A formally adopted and agreed communications strategy. 165. Regular reporting to the CLG. 166. Agreed KPIs covering engagement activity, response times, complaints and community satisfaction, potentially with penalties for failing to meet these KPIs. 167. Periodic reviews of the strategy to reflect changing project circumstances. 168. Independent chairing or facilitation where appropriate. Please also see the council's response to question SE2.9 below.	

ExQ2	Question to:	Question:	Applicant's Response
Landscape and Visual (LV)			
Cotswolds National Landscape			
LV2.1a	The Applicant Wiltshire Council Natural England Cotswolds National Landscape Board (CNLB)	Time Limited Enhancements The applicant's stated in its response to ExQ1 LSF1.1 [REP3-128] that there are no significant permanent effects on agricultural land, as all land will be returned to its original use and condition as far as practicable following decommissioning. The creation of wildflower meadows within fields A1, C1, C6, C8, C9 and B12 and the creation of wildflower meadow verges in A11, A12 and C10 are relied on by the applicant as beneficial effects to further the purposes of the Cotswolds National Landscape (CNL). The ExA understands that these enhancement measures are therefore time limited and removed at decommissioning. <u>The Applicant:</u> 1) The applicant is asked to confirm if the ExA's understanding is correct.	The Applicant refers to its response to LV2.1 in the Applicant's Response to the Examining Authority's Second Written Questions [REP5-097]. The Applicant notes this comment and welcomes WCs recognition of the beneficial effects associated with the measures provided by the Development to 'Seek to Further the Purposes' of the s.85 Duty.

ExQ2	Question to:	Question:	Applicant's Response
		<u>The Applicant, Wiltshire Council, Natural England and the CNLB:</u> 2) The parties are asked to comment on whether a time limited enhancement can be relied on to seek to further the purpose of conserving and enhancing the natural beauty of the national landscape under section (s) 85 of the Countryside and Rights of Way Act 2000 (as amended) (CRoW Act)? The council considers that 'time limited' genuine enhancements spanning up to 60 years, could be viewed as contributing to seek to further the purpose of conserving and enhancing the National Landscape as they would represent beneficial landscape effect/s in LVIA terms, albeit over a time limited period. However, the council also considers that these benefits / enhancements cannot be detached from the harms that are generated by the development and which are viewed to conflict with the purpose of the s.85 duty.	
LV2.1b	The Applicant	3) If enhancements are removed at decommissioning, would that then be considered a harm to the purposes of	The Applicant respectfully disagrees with WCs position on this and reaffirms its position that rather than this bringing 'harm' to the purposes of the CNL, that the

ExQ2	Question to:	Question:	Applicant's Response
	Wiltshire Council Natural England Cotswolds National Landscape Board (CNLB)	the Cotswolds National Landscape at decommissioning? The council considers that in LVIA terms, removal of genuine enhancements would represent a neutral effect when measured from the existing LVIA baseline (time of assessment). However, in the context of the s.85 duty, the council considers that the physical loss of mature natural landscape fabric / components and established habitats present in the landscape for up to 60 years, aligned to conserve and enhance the character and special qualities of the CNL, would result in adverse landscape effects when measured from the decommissioning baseline situation. The council considers that the removal of enhancements at decommissioning stage would harm the purposes of conserving and enhancing the CNL.	removal of these enhancements would constitute a return to the baseline position. The Applicant considers that a time-limited enhancement can be relied upon to seek to further the purpose of conserving and enhancing the natural beauty of the CNL under section 85 of the CROW Act as there is no specific requirement within the wording of the Act or supporting DEFRA guidance for enhancements to be permanent. The duration of the enhancement is of course relevant to the weight that the Secretary of State may apply to it, but it would be a perverse interpretation if 60 year enhancements could not be taken into account. This would also disincentivise applicants from seeking opportunities to provide enhancements where indefinite permanence of those enhancements cannot be guaranteed, particularly in a context where the future baseline could evolve over time.
LV2.3	Wiltshire Council	Issue Specific Hearing 2, Action Point 13 The ExA notes that Wiltshire Council responded to Action Point 13 of ISH2 [REP4-093] to state that it considers that the CNLB to be the party which is best placed to	The Applicant notes that Wiltshire Council has not answered the Examining Authority's question about whether it agrees with the CNLB that the Applicant has sought to further the purposes of the CNL.

ExQ2	Question to:	Question:	Applicant's Response
		provide details of cases which support its position on how the duty to further the purposes of the CNL under s85 of the CRow Act should be applied. It is the ExA's understanding from ISH2, that Wiltshire Council's position was that the duty to seek to further the purposes of the CNL under s85 of the CRow Act would not be fulfilled by the proposed development. On the Other hand, the CNLB state in its D3 submission [REP3-154] that it considers the applicant has sought to further the natural beauty of the CNL through the proposed enhancement measures located in its setting. Wiltshire council is asked to confirm if it is now in agreement with the CNLB's position regarding the duty under s85 of the CRow Act? If not, it is asked to respond to action point 13 from ISH2. The Council acknowledges the CNLB's position as set out in PMIE 1 [REP3-154] but does not agree that the referenced set-aside land represents an enhancement, it is essentially provided as ground nesting bird	

ExQ2	Question to:	Question:	Applicant's Response
		mitigation and effectively remains as agricultural land requiring cultivation every 2-5 years to maintain its status. Wiltshire Council considers that it has provided a detailed response to ISH2 Action Point 13, within its Post hearing submissions [REP4-092] 'Duty to Further the Purposes of the CNL' in paragraphs 2.27 to 2.32 (pages 11-12), including reference to legal judgements to support its position.	
Design and Parameters			
LV2.9	The Applicant Wiltshire Council	Independent Design Review The applicant states in the Design Approach Document [APP-268] (Table A-1) that an independent design review is not necessary because the design team are very experienced. An experienced design team does not offer the same benefit to design development that an independent review can have. Given that there are a number of areas where flexibility is still required at this stage, should a design review post DCO consent and prior to the approval of detailed	The Applicant's full response to this question appears in its Response to the Examining Authority's Second Written Questions [REP5-097]. The Applicant maintains that the existing framework of the DCO provides the necessary independent oversight suggested, which means a further separate design review process is unnecessary.

ExQ2	Question to:	Question:	Applicant's Response
		design be secured to include the following components of the proposed development? - The proposed solar photovoltaic technology (Work No. 1 (a)) - The layout of: the energy storage facility (Work No. 2) - o the onsite substations (Work No. 3) - o proposed temporary and permanent access points from the public highway (Work No. 8) The council would support an Independent Design Review for (Work no. 1 (a)) – the proposed solar photovoltaic technology; the Layout of (Work no. 2) – the energy Storage Facility (BESS); the layout of (Work no.3) – the On-site substations and (Work no.8) – Proposed temporary and permanent access points from the public highway, as this would offer an extra degree of comfort to the council prior to submission of detailed design that development components have been independently reviewed.	

ExQ2	Question to:	Question:	Applicant's Response
Noise and Vibration (NV)			
NV2.3	Wiltshire Council	Background Noise Level Methodology In ExQ1 NV1.5 the ExA asked the Council to reconsider whether the applicant's use of fixed 30dB as a minimum background noise level at night continued to be appropriate. In its response [REP3-142], the Council presented the relevant British Standard and guidance and agreed that it was acceptable to replace background noise measurements with a fixed level as the applicant had done. The ExA appreciates the Council's explanation of the relevant British Standard and the associated guidance from the Association of Noise Consultants, which appears to allow for such an approach, but the ExA nonetheless still queries whether the effect of doing this firstly ignores the context of the receiving environment, and secondly artificially raises the baseline and therefore raises the LOAEL and SOAEL level (which is set against the baseline), which in turn informs the assessment of significance in EIA terms. The ExA would welcome a further response from the Council to these queries,	The Applicant refers Wiltshire Council to its response given to NV2.3 in the Applicant's Response to the Examining Authority's Second Written Questions [REP5-097].

ExQ2	Question to:	Question:	Applicant's Response
		particularly as the definition of 30dBL as a 'very low' background level was removed from the British Standard and is not supported by the current version of BS4142:2014, and given the rural location where background levels at night were found for some residential receptors to be as low as 20dB and may therefore have given rise to a lower threshold for receptor sleep disturbance than the internal noise levels recommended in both BS 8233:2014 and the World Health Organisation (WHO) Guidelines, which were also cited by the Council. The council notes the Examining Authority's concerns regarding the treatment of very low background sound levels and the potential implications for the derivation of LOAEL and SOAEL thresholds. The council's view remains that, when considering potential impacts on sleep disturbance during the night-time period, the noise-sensitive location is within bedrooms rather than in external amenity areas. Consequently, reliance solely on BS	

ExQ2	Question to:	Question:	Applicant's Response
		4142:2014, which is primarily concerned with the assessment of industrial and commercial sound in relation to outdoor background sound levels, is not considered an appropriate basis for determining the likelihood of sleep disturbance or the significance of night-time effects on residential receptors. Whilst BS 4142 provides a recognised method for characterising the relationship between a specific sound source and the prevailing acoustic environment, the council considers that the assessment of night-time residential effects must also take account of internal noise criteria and relevant health-based guidance. In this regard, BS 8233:2014 and the WHO Environmental Noise Guidelines provide an appropriate framework for assessing the potential for sleep disturbance, as they are specifically directed towards the protection of occupants within dwellings. The council acknowledges that the current version of BS 4142:2014 does not identify 30 dB LA90 as a 'very low' background sound	

ExQ2	Question to:	Question:	Applicant's Response
		level and that measured night-time background levels at some receptors were lower than this. However, the council does not consider that lower external background sound levels necessarily translate directly into a proportionately lower threshold for sleep disturbance. The accepted internal noise guideline values set out in BS 8233:2014 and referenced by the WHO are based on extensive research into the protection of sleep and occupant amenity and remain applicable across a range of external acoustic environments. Accordingly, the council considers that the significance of effects should not be determined solely by reference to changes in very low external background sound levels or by the derivation of LOAEL and SOAEL thresholds from those levels. Rather, significance should be informed by a balanced assessment that considers both the external acoustic context and the extent to which internal noise environments, where residents are most sensitive during the night-	

ExQ2	Question to:	Question:	Applicant's Response
		time period, comply with established health-based and residential amenity criteria.	
Socio-Economics (SE)			
SE2.1	Wiltshire Council	Economic Impacts Q1 The SoCG with Wiltshire Council [REP4-061], section 3.12.5, raises concerns over the local impact on the tourism industry with losses of approximately £1.76million. The applicant's response is that this figure represents less than 0.15% of the value of the combined tourism industry in Wiltshire. However, it is not the entirety of Wiltshire where these losses will be felt, but the local area around the proposed development, so this figure will have a more significant effect. This is discussed further in the applicant's response to deadline 3 submissions [REP4-082], section WC-035, where the applicant states that within a 5km area from the proposed development the losses would equate to 0.7%. The SoCG with Wiltshire Council section 3.12.11 suggests a compensation scheme for businesses to	The Applicant has provided their reasoning for their objection to the implementation of a business compensation scheme within its response to question SE2.1 in The Applicant's Response to the Examining Authority's Second Written Questions [REP5-097]. The Applicant does not agree that such a compensation scheme is proportionate to the likely effects the Scheme will have on local business, given the level of mitigation measures secured through the DCO. The Applicant is continuing to engage with Wiltshire Council through the Statement of Common Ground [REP5-087] to understand the extent to which there is not yet agreement on the economic mitigation measures proposed by the Applicant. Up to this point, the Applicant's objections to the proposals for a business compensation scheme have been based on what has been received in written representations [REP2-046, REP2-048], and discussed directly through the Statement of Common Ground process. Whilst only high-level, this indicated

ExQ2	Question to:	Question:	Applicant's Response
		alleviate the negative effects on local businesses [REP4-061]. <u>The Applicant:</u> 1) Although losses might equate to less than 1% within a 5km area this could be quite significant to an individual business resulting in job losses and a loss of income below basic operating costs. The applicant is asked to detail its objection to the Council's suggestion of a compensation scheme to keep businesses operating during construction, maintenance and decommissioning given funding such a scheme should not be significant. <u>Wiltshire Council:</u> 2) You are asked to provide details of such a business compensation scheme, including further justification, how this would work, including the administration, eligibility and what measures would prevent businesses from taking advantage of it. You are also asked to detail how this would fit within the structure of the DCO or if it should be implemented via a s106 agreement.	the Council was looking for compensation to businesses showing a 10% reduction in income during and one year after construction and decommissioning. Taken at face value, the Applicant considers there was too little information to understand how it could be shown that a 10% variation would be as a result of the Scheme itself, particularly given in tourism-dependent sectors where more than 10% differences in income year-on-year are experienced due to uncontrollable factors such as macro-economic conditions such as weather, inflation, interest rates, international conflict – all of which can affect how people spend their money, and where and when tourists chose to visit or stay. Furthermore, the lack of a precedent case for construction projects of this nature was considered by the Applicant to be another reason why it would be more reasonable to rely on the mitigation measures secured through the Draft DCO [REP5-012]. The Applicant was informed by Wiltshire Council that the only precedent case for a similar business compensation or support scheme in Wiltshire was in response to the Salisbury and Amesbury Novichok Incident in 2018, to which Wiltshire Council has referred to in their response. In this incident, the primary reason for a reduction in business turnover

ExQ2	Question to:	Question:	Applicant's Response
		The compensation scheme would be similar to one that the council implemented as a result of the incident in Salisbury in 2018. Businesses that could show a drop in monthly income of 30% or more were invited to apply for compensation. The businesses had to submit detailed spreadsheets of income for the month they were claiming and the corresponding month from the previous year. In some cases, this was expanded to the previous two years. A panel of council officers would then decide if there was a genuine claim. However, before compensation was paid, the council would ask the applying business to submit at least two years of audited accounts so that the council could assess the business viability prior to the incident. The council would also interview the business owner and if necessary, get confirmation from a suitable source, e.g. a bank, regarding its financial strength. For this scheme, the council would anticipate that the panel would comprise of Wiltshire Council officers but would be open to having representation from the Applicant as well.	was due to the effect of visitors being more hesitant to go to Salisbury and Amesbury due to fear of poisoning, even after it was declared safe to return. The Applicant was informed that the qualification metric for businesses to receive compensation or support was where they could show a 30% reduction in any month's income compared to the same month the year before, with an additional two years of trading accounts to show that the business was a viable concern prior to the incident. The Applicant therefore maintained its objection to a similar scheme as it was not considered reasonable that the construction of the Scheme should be compared to an internationally significant poisoning attack with a resultant fear for life being the underlying reason for visitors being discouraged from the area. The Applicant cannot understand why the Scheme would have a <u>more sensitive</u> qualification threshold than that of the Salisbury and Amesbury Incident given the fundamental, underlying differences between them.

ExQ2	Question to:	Question:	Applicant's Response
		The council would expect remuneration from the Applicant for officer's time on a compensation scheme. This scheme works well in sectors like retail and hospitality. However, further consideration is needed as to how it would be used for more rural businesses like the equine sector. In Salisbury, it was effective in ensuring that the county did not have an increase in business failures due to the impact of the incident. Overall, the council considers that the scheme was well received, although acknowledges that some businesses did not welcome the need to share financial information. However, without doing so, no compensation would be agreed and / or provided. In Salisbury, the compensation scheme was complimented with a package of business support measures that were used when suitable. A report was commissioned looking at the impact on Salisbury of the incident which the council has shared with the Applicant. The	

ExQ2	Question to:	Question:	Applicant's Response
		findings were positive and the team that administered the scheme were praised. The council considers that the inclusion of the requested business compensation scheme would be best placed within the structure of the DCO, although are open to it being included within the S106 that is currently being drafted by the Applicant.	
SE2.3	The Applicant Wiltshire Council Interested Parties whose community facility they consider will be adversely affected by the proposed development	Compensation for Community Facilities <u>All Parties:</u> The SoCG with Wiltshire Council, section 3.12.11, suggests a business compensation scheme [REP4-061]. Aside from the compensation to businesses there have been concerns raised by operators of community facilities that the proposal will result in their closure resulting from a lack of bookings during the construction, maintenance and decommissioning phases. Examples include [RR-2749], [RR-4315], [RR-4617]. All parties are asked to consider if they would be agreeable to a community facility compensation fund that would ensure they remain open and functional during the	The Applicant has provided their reasoning for their objection to the implementation of a business compensation scheme in its response to question SE2.1, or a separate compensation scheme for community facilities in response to question SE2.3. These are set out in The Applicant's Response to the Examining Authority's Second Written Questions [REP5-097]. The Applicant does not agree that such a compensation scheme is proportionate to the likely effects the Scheme will have on local business, given the level of mitigation measures secured through the DCO. The Applicant is continuing to engage with Wiltshire Council through the Statement of Common Ground [REP5-087] to understand the extent to which

ExQ2	Question to:	Question:	Applicant's Response
		aforementioned phases and available for community use despite any negative effects of the proposed development. The applicant should note that simple reference to the Community Benefit Fund is not considered an appropriate response. <u>Wiltshire Council:</u> You are asked to provide details of such a community facilities compensation scheme, including further justification, how this would work, including the administration, eligibility and what measures would prevent businesses from taking advantage of it. You are also asked to detail how this would fit within the structure of the DCO or if it should be implemented via a s106 agreement. The council considers that the scheme outlined in SE2.1 would be equably applicable in these circumstances. It would ensure community facilities are compensated for any reduced income that may occur during the construction, replacement and decommissioning phases plus one subsequent year once	there is not yet agreement on the economic mitigation measures proposed by the Applicant.

ExQ2	Question to:	Question:	Applicant's Response
		these works had been completed.	
SE2.6a	The Applicant Wiltshire Council Wiltshire Bridleways Association (WBA)	Permissive Paths Q2 A number of IPs [too many to list] have raised concerns about the impact on the enjoyment of footpaths in the Order limits. Concerns have also been raised that businesses will suffer as a result of a loss in recreational trade, for example [REP4-113]. The Council has suggested that an improvement fund should be provided by the applicant to cater for the displacement of users of the PRow network within the Order limits [REP4-061]. It is considered that the enjoyment of the existing PRow network within the Order limits will not be improved by the proposed development, regardless of additional connections and physical improvements. Therefore, the ExA considers that the Council's suggestion for a fund that seeks to improve the network outwith the Order limits to take account of displaced use, is not unreasonable. This would continue to encourage use of the wider PRow network	The Applicant notes this comment, particularly the proposed drafting and the nine uses of any contribution and will remain in discussions on this matter as the Council have set out. The Applicant maintains its position that a financial contribution for off-site PRow improvements during the operational life of the Scheme through a Section 106 agreement is inappropriate because it fails to meet the "necessity" test required by Regulation 122. The Applicant's position is that financial contributions and other commitments made pursuant to s106 of the Town and Country Planning Act 1990 must be compliant with Regulation 122. ES Volume 1, Chapter 16 [APP-068] concludes that there are no significant residual adverse effects on the wider PRow network or public mental health once on-site mitigation is implemented, there is no evidential basis of significant harm to justify the contribution as a necessary planning mitigation. The Applicant remains committed to providing the financial support requested by the Council, it maintains

ExQ2	Question to:	Question:	Applicant's Response
		regardless of the effect the proposed development. This approach will likely provide mitigation for businesses concerned by the loss of recreational trade and benefits to the mental health of those concerned by the loss of ambience on the network. <u>The Applicant:</u> 1) The applicant is requested to detail specifically their objections to the Council's suggestion of PRoW improvement funds linked to the DCO via a suitable mechanism outwith the Community Benefit Fund, such as a s106 agreement, to improve paths outwith the Order limits to cater for increased footfall resulting from the adverse effect on paths within the Order limits. <u>Wiltshire Council:</u> 2) Please provide a suggested mechanism by which this should be agreed. If this is via a s106 agreement, then please provide draft wording, noting that a signed and executed s106 agreement would need to be submitted before the close of the examination for it to be considered by the SoS.	that this funding should be delivered as a community benefit rather than as a planning obligation.

ExQ2	Question to:	Question:	Applicant's Response
		As previously stated, the council's preferred mechanism is to secure the PRoW contribution via a section 106 agreement as it provides transparency and commitment to funds and mitigates against any possible risks in the future. The council is in active discussions with the Applicant on the appropriate mechanism, with the Applicant of the opinion that the contribution does not meet the legal test. The council's submission is that Regulation 122 (The Community Infrastructure Levy Regulations 2010) does not say that a non-compliant obligation is void. It says: "A planning obligation may only constitute a reason for granting planning permission for the development if the obligation is..." necessary, directly related, and fairly and reasonably related in scale and kind." The Council's submission is that the wording is important, as the regulation restricts the use of the obligation as a reason for granting	

ExQ2	Question to:	Question:	Applicant's Response
		permission; it does not state that the parties are prohibited from entering into the obligation. The council is of the opinion that the parties are free to enter into a deed containing obligations that go beyond the Regulation 122 tests, but the decision-maker must not rely on those non-compliant obligations as part of the justification for granting consent. The council's proposed drafting for the S106 is as follows: "The Owner shall pay to the Council the sum the annual of £20,000 (Twenty thousand pounds) ("the Public Rights of Way Improvement Contribution") prior to the commencement of the authorised development (or such other reasonable trigger(s) as agreed by the Council) from the start of the authorised development over the lifetime of the authorised development, which shall be indexed-linked. The Council shall apply the Public Rights of Way Improvement Contribution towards the improvement, enhancement and management of Public Rights of Way outside	

ExQ2	Question to:	Question:	Applicant's Response
		the Order limits, including but not limited to improvements to route quality, surfacing, accessibility, connectivity, signage, wayfinding and recreational infrastructure. The Contribution shall be used to: 1. accommodate increased recreational use and footfall on the wider Public Rights of Way network resulting from the authorised development; 2. improve paths and associated infrastructure outside the Order limits to cater for users displaced from routes affected by the authorised development within the Order limits; 3. provide alternative and enhanced recreational opportunities that encourage continued use of the wider Public Rights of Way network; and 4. mitigate the effects of the authorised development on recreational users, local communities and businesses that derive benefit from recreational activity and visitor use of the network;	

ExQ2	Question to:	Question:	Applicant's Response
		5. in years 1 to 20 of operation, improvements will be targeted on footpaths starting within 2km of the red line boundary (excluding the cable connection route) and within 3km of other routes of Public Access starting; 6. in years 20 to 40, this will be increased to encompass footpaths starting within 3km of the authorised development's red line boundary and other route of public access starting within 4km (excluding the cable connection route). 7. in years 40 to 60, this should be increased to encompass footpaths starting within 4km of the sites red line and other routes of public access starting within 5km (excluding the cable connection route); 8. all contributions to be spent within 5 years of the site being decommissioned, or the Council covenants with the undertaker that unspent contributions will be returned; and 9. if the authorised development is at any point granted an extension to its life span, then the arrangement should continue and	

ExQ2	Question to:	Question:	Applicant's Response
		follow on for the length of the new agreement. If an extension is granted, then the area in which the funding can be spent should be increased by a further 1km for every additional 10 years."	
SE2.6b	The Applicant Wiltshire Council Wiltshire Bridleways Association (WBA)	3) Additionally, the Council is asked to set out any role the WBA would be expected to have in contributing to the administration of this fund given its requests for improvements to the PRoW network as detailed in its SoCG with the applicant [REP4-073]. The Council would see the Wiltshire Bridleway Association purely as a consultee rather than a decision maker on how funds would be allocated. <u>Wiltshire Bridleways Association:</u> Should the applicant provide a fund for the improvement of the PRoW network as described and requested by Wiltshire Council, please set out what role you would expect to play in its administration, if any.	The Applicant notes this comment. Where funding for PRoW upgrades is to be undertaken through the Community Benefit Fund, the Applicant would also expect the Wiltshire Bridleway Association to be consulted upon by the fund's administrators, rather than act in any decision-making or administrative function directly. Feedback and recommendations would also be facilitated through the Community Liaison Group and its communication channel with the Community Benefit Fund administration group.
SE2.9	The Applicant	Community Liaison Group	The Applicant refers to their response to question SE2.9 in The Applicant's Response to the

ExQ2	Question to:	Question:	Applicant's Response
		Requirement 4 of the dDCO sets out the terms of the CLG [REP4-004]. However, it makes no mention of its function, if any, during maintenance/ replacement activities or during decommissioning. The ExA considers the CLG should retain a function throughout the key phases of the life of the proposed development to include maintenance/ replacement activities and decommissioning, and requests that the applicant updates Requirement 4 accordingly. Furthermore, both Stop Lime Down [REP4-132] and Wiltshire Council [REP1-137] raise concerns over the function of the CLG and consider that it should operate in a collaborative manner with communities to allow them the chance to shape the final design of the project in a meaningful way. Stop Lime Down also comment on developing an effective communication strategy and the employment of a relationship manager. The applicant is asked to update the terms of the CLG to include reference of its function	Examining Authority's Second Written Questions [REP5-097], which sets out how the Community Liaison Group is committed to being set up through the construction phase, peak replacement activities, and the decommissioning phase of the Scheme. During the operational lifetime of the Scheme through normal operations and maintenance work, a dedicated community contact point is secured through the Outline Operational Environmental Management Plan [REP5-073] by Requirement 14 of Schedule 2 to the Draft DCO [REP5-012]. The Applicant confirms that ongoing discussions with Wiltshire Council (as documented through the Statement of Common Ground [REP5-087] process) are sought to agree principles and an early draft example of terms of reference for the Community Liaison Group, ahead of being finalised pursuant to Requirement 4 in Schedule 2 to the Draft DCO [REP5-012]. The Applicant acknowledges the Council's recommendation to apply the principles of the Suffolk Supplementary Guidance Document (SGD) to the post-consent phase in their response the HW1.2 (see above) and is not opposed to incorporating relevant

ExQ2	Question to:	Question:	Applicant's Response
		through the key phases of the proposed development during operation/maintenance and decommissioning as these periods are likely to raise similar community concerns as those during construction. The updated terms should also consider the comments from the Council and Stop Lime Down and explain the expected role of community groups, individuals and Parish Councils and the potential role of a relationship manager. Whilst it is acknowledged that this question is directed towards the Applicant, the council agrees that community engagement should continue beyond construction and that the Community Liaison Group (CLG) should operate throughout the construction, operation, maintenance and decommissioning phases of the development relevant to the activity being undertaken. There needs to be an ongoing, established way to discuss and address potential issues such as traffic, access, environmental management and local impacts. The CLG should have a clear role in facilitating communication between the	post-consent principles from this guidance into the Community Liaison Group's Terms of Reference.

ExQ2	Question to:	Question:	Applicant's Response
		Applicant, local communities and parish councils. It should operate as an advisory and collaborative body rather than a decision-making forum, with responsibility for delivery remaining with the Applicant. The Applicant should also set out how community groups, parish councils and local residents will be represented and engaged through the CLG. Administrative and liaison support should be provided by the Applicant; it should not be on parish councils or Wiltshire Council to provide this. A dedicated community liaison or similar role should act as a consistent point of contact between the Applicant, communities and local authorities. This would help ensure concerns are addressed promptly, improve transparency and support effective communication throughout the life of the development. The Applicant's Requirement 4 and the associated terms of reference need to clearly define the CLG's role during operation, maintenance and decommissioning, including arrangements for ongoing	

ExQ2	Question to:	Question:	Applicant's Response
		engagement, reporting and issue resolution. The council considers that the CLG must retain a function throughout the key phases of the life of the proposed development.	
SE2.10	The Applicant Wiltshire Council	Innovation Forum Wiltshire Council set out in its response to ExQ1 SE1.10 [REP3-142], how an 'Innovation Forum' could operate and suggested that it could form part of the CLG. The applicant noted the benefits of an Innovation Forum in its deadline 4 response [REP4-081] but suggested that opportunities for an Innovation Forum could be considered through the same forums used for the Community Benefit Fund (CBF). The ExA is mindful that the purpose of the CLG is to provide information on the state of works during key phases of the proposed development and provide a forum for concerns/ complaints to be raised and addressed. It is not clear that an Innovation Forum would sit comfortably within this operation given the potential community burden this could place on volunteers.	The Applicant refers to their response to question SE2.10 in The Applicant's Response to the Examining Authority's Second Written Questions [REP5-097], to which the Applicant has set out its understanding of how the Innovation Group would operate at each phase of the Scheme and which securing mechanism it believes is most appropriate for each phase. The Applicant confirms that the delivery and operation of the Innovation Forum has been added as a matter of discussion in the Statement of Common Ground with Wiltshire Council [REP5-087] and intends to use Wiltshire Council's response to SE2.10 as a means to finalise an agreement on the delivery of the Innovation Forum in the next iteration(s) of the Statement of Common Ground.

ExQ2	Question to:	Question:	Applicant's Response
		<u>Wiltshire Council:</u> 1) You are asked to consider how, in practical terms, an Innovation Forum would operate as part of the CLG without adding further burden on volunteers, including Parish Councils. Wiltshire Council has considered how an Innovation Forum would operate as part of the Community Liaison Group, without adding further burden on volunteers, including Parish Councils. The following approach is considered deliverable, however the finer detail of logistics should be agreed with the Community Liaison Group and formalised through a Terms of Reference. It is important to agree the objectives of an Innovation Forum first, whereas the precise delivery arrangements could have different options. Precise details of how it runs should be confirmed via a Terms of Reference. The Community Liaison Group Terms of Reference should mention the Innovation Forum, and include the task to finalise	

ExQ2	Question to:	Question:	Applicant's Response
		arrangements for the Innovation Forum before the CLG ends. An Innovation Forum becomes necessary by year 5 of the project, when it is plausible that technology will have moved on, and there is potential to start considering technology and approaches to inform any replacement of equipment, or new ways of working. At this time the Community Liaison Group can finalise arrangements, taking account of what the community and parish councils will find useful. A liaison role would be needed to coordinate the activity of the Innovation Forum, and this function could sit with the existing community engagement / liaison role within the project management team (with IGP). A Wiltshire Council officer would also need to be assigned to liaising as part of their role. A Planning Performance Agreement could be a way to secure delivery of the Innovation Forum and its objectives, as there would be a cost associated with the liaison functions and activity required.	

ExQ2	Question to:	Question:	Applicant's Response
		The Innovation Forum should be mentioned within the OEMP, Decommissioning Strategy and potentially the Battery Safety Management Plan. Innovation Forum activity could take the form of annual or 6-monthly events aimed at sharing knowledge about new technology and considering whether there is anything that can be explored for incorporate into operation or decommissioning. A liaison role would coordinate, and invite Parish Councils and other stakeholders to attend. There would also be an ongoing open channel of communication, should stakeholders wish to bring anything to the attention of the project management team. However, structured input and discussion would be restricted to key events or processes, to be determined in the Innovation Forum's Terms of Reference, but is anticipated to include in the lead up to replacement, significant maintenance and / or decommissioning activities. This is not seen as a burden on parish councils or other stakeholders, especially	

ExQ2	Question to:	Question:	Applicant's Response
		those acting in a voluntary capacity. It would be an opportunity to share information, hear about latest developments, on an opt-in basis. The Terms of Reference should make it clear that the Innovation Forum is for positive, proactive dialogue, and not a platform for stakeholders or members of the community to raise concerns about the project. Likely opportunities / objectives for the Innovation Forum include: 169. New technology and Innovation: Opportunity to explore new innovation in relation to technology or ways of working. E.g. replacement panels, how and where they are produced. Supply chain resilience and innovation. Potential to explore additional collaborative elements as part of the project, that may not be feasible at the outset of the project, but may become of interest to relevant parties e.g. exploring agrivoltaics, or purchase of	

ExQ2	Question to:	Question:	Applicant's Response
		electricity produced at the site for local use (virtual). 170. Knowledge share: An opportunity for the project management team to keep the community informed and assured of how the project is evolving, perhaps taking advantage of new technology. There is also the opportunity for the project team to provide expertise into local projects, as part of the community benefits stream, e.g. knowledge of renewable energy to inform private installation by farmers or community-led projects. <u>The Applicant:</u> 2) The Council has provided an example of how the Innovation Forum could operate and cited the Crossrail Elizabeth Line governance and innovation in their responses to ExQ1 [REP3-142]. You are asked to consider if such an approach would be suitable for the proposed development and how it could be secured by the dDCO.	

ExQ2	Question to:	Question:	Applicant's Response
		<u>Both Parties:</u> 3) You are requested to add this point to the SoCG with the aim of reaching a consensus on how the Innovation Forum should be delivered. An item relating to the Innovation Forum has been added to the SoCG with Wiltshire Council, which will be submitted at Deadline 5.	
Transportation, Traffic and Highway Safety (TT)			
TT2.1a	The Applicant	Construction Phase HGV Trip Generation The ExA notes that the Transport Assessment was updated at deadline 1 [REP1-057 and REP1-059] to include new paragraphs 1.5.3 to 1.5.18 and Table 13-12 to provide further context and breakdown of HGV movement calculations for the construction phase. Specifically, paragraph 1.5.3 states: <i>To understand the number of HGV movements during the construction phase,</i>	The Applicant refers Wiltshire Council to its response given to TT2.1 in the Applicant's Response to the Examining Authority's Second Written Questions [REP5-097]. The Applicant has updated the ES Volume 3, Chapter 7: Climate Change [REP5-022] submitted at Deadline 5 to include updated traffic figures. Trip Generation calculations have been refined as further detail of the project has come forward. The Applicant has since submitted revised trip generation calculations in the same format as the SLD calculations at Deadline 5. This document is titled 'Highways Technical Note in Response to

ExQ2	Question to:	Question:	Applicant's Response
		<i>trip generation has been calculated based on a first principles approach. This takes account of quantities of the following materials and activities required during the construction phase:</i> <i>• Number of Solar PV modules;</i> <i>• Number of Solar PV module mounting structures;</i> <i>• Volumes of waste;</i> <i>• Number of Skids and power stations;</i> <i>• Cable lengths within the Solar PV Sites; and</i> <i>• General activities, including fencing, landscaping, compounds etc.</i> A new Annex E was also provided to that document which provided a summary of the assumed components for construction of the solar PV sites. Part of that table is extracted and copied below:	Appendix A of the SLD Deadline 4 Submission' [REP5-107]. These calculations are currently being discussed with SLD's transport consultant.

ExQ2	Question to:	Question:	Applicant's Response
		As can be seen from that table, the applicant assumed that a total of 588,988 solar PV panels would be installed on the sites and it is that number of panels which has informed the 1,200 HGV delivery figure. The ExA notes that this would roughly align with paragraph 7.10.11 of the Climate Change Chapter [APP-059], which stated that the total number of modules to be installed is expected to be 598,260. However, at deadline 3, the applicant's Climate Change Sensitivity Assessment Report [REP3-132], which in essence is a rebuttal to Wiltshire Council's and Stop Lime Down's written representations on climate change, stated that <i>a notional figure of approximately 842,000 panels has been assumed, which reflects an estimated maximum achievable installed capacity of the Scheme within the defined design parameters</i>. Further, in responding to Stop Lime Down's Transport submission at deadline 3 [REP3-133], the applicant suggested that up to 864,000 panels would be delivered if using high-cube containers	

ExQ2	Question to:	Question:	Applicant's Response
		(instead of regular containers) without increasing the number of HGV deliveries stated in the Transport Assessment (1,200). The ExA remains concerned that the applicant has underestimated the amount of solar PV panels required in its original assessments (and thus has not assessed the worst-case), and for transport issues specifically that it is either maintaining that the 1,200 deliveries associated with 588,988 modules would be no greater for 864,000 panels (and the associated increase in mounting structures), or alternatively relies upon the 50% buffer to account for under assessment. This was discussed to some extent at ISH3 in light of Stop Lime Down's notably divergent HGV trip forecasts, but the matter is far from resolved. The ExA notes that there has been some recalculation provided by Stop Lime Down at deadline 4 [REP4-132], but a similar re-appraisal has not been undertaken by the Applicant. In light of the applicant's changing position on solar PV panel numbers during the examination, which is not reflected in its Transport	

ExQ2	Question to:	Question:	Applicant's Response
		Assessment, the ExA requires the applicant to: 1) Provide a comprehensive rebuttal to Stop Lime Down's revised HGV Trip Generation Report included in Appendix A [REP4-132]; and 2) Provide its version of the numbers included in Stop Lime Down's 'Assessment of Construction Traffic Movements' and 'Flow Diagrams' in pages 140 to 143 of [REP4-132], using the exact same format and presentation as Stop Lime Down in those pages so that direct comparison can be made. This request is in addition to the outstanding ISH3 Action Point 12 submission, which required a full response to the points raised by Wiltshire Council and Stop Lime Down at ISH3 and Table 2 of [REP1-172], which compares the ratios of HGV deliveries to the solar array areas for five other solar projects with the applicant's stated HGV delivery figures for solar panels and mounting structures for Lime Down.	

ExQ2	Question to:	Question:	Applicant's Response
		Whilst it is noted that this question was posed to the Applicant, in the council's Highways Development Management comments on the Written Summary of the Applicant's Oral Submissions and Responses at the ISH3 Hearing it was stated: "The Applicant notes that "An initial allowance was made for 600,000 solar PV panels (1,200 deliveries), based on standard containers, assuming 500 panels per HGV. If high-cube containers are used (720 panels per delivery), this would allow for 864,000 solar panels with the same number of deliveries". In the Wiltshire Council Deadline 4 response to the Applicant's response to their Written Representation, the council's comments noted that "Annex E to the latest Transport Assessment (Rev 3) still advises that the overall PV component quantum over the five Lime Down Solar Park sites is expected to be 588,988, which based on the 469ha (1159 acre) area would yield a PV Module density of 508 per acre. This would appear to be insufficient to generate the 1MW output sought from every 2.4-acre area	

ExQ2	Question to:	Question:	Applicant's Response
		equipped with panels". This was in response to the Applicant's comment that that "NPS EN-3, paragraph 2.10.17, indicates that 2-4 acres will be required for each MW of output, with 50MW of generation requiring 125 to 200 acres and 100,000 to 150,000 panels. This equates to a panel density of 750 to 800 panels per acre". A satisfactory response to this query remains outstanding, despite the Applicant citing the SLD PV delivery figures as too high. It is further noted that the same point is made in the Deadline 4 SLD response to the Applicant's Deadline 3 replies (para 3.2.2 and Table paragraph reference item 2.1.7: Calculation of Numbers of Solar Panels).	
TT2.1b	The Applicant	Furthermore, in the SLD comments concerning the 'Number of Solar Panels/HGV', their transport consultant notes that that the use of a high load container only increases its volume by around 12%, so it is unclear how it is deduced by the Applicant that using these would lead to an increase in capacity of 44% (i.e. from 500 panels to 720 panels per load). The point is a very valid one accepted by the council, so more	The Applicant confirms that the capacity of 720 modules per High Cube container, compared with 500 modules in a standard 40ft container, has been verified by the relevant manufacturer and suppliers in the Applicant's operational supply chain. While the internal volume of a High Cube container is approximately 12% greater, its additional height allows modules to be stacked more efficiently, increasing the number transported per container. This container capacity has been incorporated into the Applicant's Engineering,

ExQ2	Question to:	Question:	Applicant's Response
		explanation by the Applicant is needed. However, it should not necessarily be assumed that all panel deliveries could be made using these high load containers if looking at a reasonable worst-case.	Procurement and Construction (EPC) modelling on another IGP scheme, and verified by operational contractors to accurately inform the assessment. The Applicant has updated the Outline Construction Traffic Management Plan (CTMP) [REP5-083] at Section 6.17 submitted at Deadline 5 to confirm the use of high cube containers.
TT2.3a	The Applicant Wiltshire Council	Outline Construction Traffic Management Plan Q1 The ExA notes from the answer to first written question TT1.10 [REP3-128], that a traffic management and monitoring system will be considered, but then section 6.14.1 of the oCTMP [REP4-057] states that this system will be implemented. <u>The Applicant:</u> 1) Can the applicant confirm which position is correct? 2) The applicant is also asked to explain how the construction delivery booking system is intended to operate and how it can guarantee that the chosen delivery contractors will have the appropriate	See response TT2.3 in the Applicant's Response to the Examining Authority's Second Written Questions [REP5-097].

ExQ2	Question to:	Question:	Applicant's Response
		technology to allow real time tracking of construction delivery vehicles? 3) What input could the local highway authority have on the type of traffic management and monitoring system employed? 4) What enforcement mechanisms would be employed for contractor failures to adhere to the oCTMP? For example, the ExA considers that simple driver retraining for not following the dedicated routes seems like a light touch. 5) Paragraph 6.14.8 of the oCTMP states that the results of the delivery data monitoring will be reported by the applicant to the contractor to identify any issues which need to be resolved and any additional measures which should be implemented to prevent these from arising again. What reporting mechanism is there to the local highway authority, or is the applicant relying solely on the local highway authority to have to request a monitoring report?	

ExQ2	Question to:	Question:	Applicant's Response
		6) The ExA is particularly interested in the applicant's approach towards adaptive management, for example should it become apparent that some of the construction routes turn out to be problematic/ or not suitable, or the HGV holding locations shown on Figure 4.3 (particularly the smaller ones on the B4044/ B4039 for example) are frequently unavailable. The ExA notes that the oCTMP does not include any measures for liaising with the local highway authority or the local communities should unforeseen issues arise. Explain why there are no adaptative management commitments included within the oCTMP? <u>Wiltshire Council:</u> 7) Can Wiltshire Council advise what its position is on the traffic management and monitoring process (including adaptive management commitments)? The council position is that an agreed TMMS process will need to be place, which is what is alluded to in the latest oCTMP (Section 6.14 'Monitoring'), where it is stated in paragraph 6.14.1 that a TMMS 'will be	

ExQ2	Question to:	Question:	Applicant's Response
		implemented as part of the final CTMP. If the DCO is granted then it is inevitable that, during the construction phase, the council's Highways team will receive complaints from residents about HGV trafficking and potential non-compliant use of incorrect routes. It will thus be important in formulating future council responses (or rebuttals) that the undertaker's main contractor(s) is able to readily provide a daily record of all HGVs entering / leaving the Solar Park PV sites including times and registration plate / supplier details. This will enable compliance to be checked against any photo evidence provided by complainers and, in addition, verify if the HGV movements in question are linked to the LDSP works. The council are in full agreement with the comments raised by the ExA in Question 4 above. In past Highway comments on the revised oCTMP received at Deadline 1, it was noted in respect of Sub-Section 6.6 Vehicle Movement that this had been revised and additionally included the following statements:	

ExQ2	Question to:	Question:	Applicant's Response
		"Drivers will receive training and be made aware of the routes to each access in advance of driving to the Site. Delivery drivers will therefore be required to follow the routes and will not be permitted to use any alternative routes" and "The requirements of the DCO and Final CTMPs are legally binding and measures to enforce drivers to use construction routes will be set out in the Final CTMPs. Any drivers not following construction routes will receive retraining". This remains unchanged in the latest oCTMP (Revision 4). It was stated prior in response <i>"This is welcomed given the concern raised in the Wiltshire Council 'Written Representation' about HGV access from the east to the Lime Down Solar Park sites A-C areas. As noted in this document, this is because the prescribed route westwards to M4 Junction 18 and then back eastwards along the B4040 / B4039 to Grittleton is considerably longer than exiting at M4 Junction 17 and using either 'The Street' through Hullavington to get to Grittleton or the Lime Down Solar</i>	

ExQ2	Question to:	Question:	Applicant's Response
		<i>Park site D route beyond Bradfield Cottages to Fosse Way via Norton. Given the significant reduction in mileage with exiting at M4 Junction 17 it is considered there could be a considerable incentive for HGV drivers seeking to access the Lime Down Solar Park A-C sites from this direction to do it. Given the legally binding powers under the DCO and OCTMP to comply with the prescribed HGV construction routes, it would be useful to understand what enforcement mechanisms can be applied and put in place beyond simple driver retraining. This seems rather 'light touch' and the power to impose fines against delivery operators consistently failing to comply with routing under the DCO or OCTMP would seem a more effective deterrent".</i>	
TT2.3b	The Applicant Wiltshire Council	It is stated in paragraph 6.14.8 of the latest oCTMP that " <i>The CTMP Co-ordinator will monitor data relating to HGV routes, the timing of HGV arrivals and departures and compliance with the HGV routing plans set out</i> ". It is unclear from this what monitoring or mechanism for doing so is planned 'on the routes', as a simple log of	As well as a delivery booking system, details will be provided at the final CTMP direct from the contractor regarding monitoring. It is likely that there are several apps available to do this logistics routing apps, but this would need to be agreed and implemented by the final contractor.

ExQ2	Question to:	Question:	Applicant's Response
		vehicles in / out of the Solar PV sites on a given day will not give any information on the route which is actually taken by an HGV supplier in travelling to / from site.	
TT2.5	The Applicant	Highway Improvement Works Q1 The ExA notes the inclusion of improved drawings within Appendix E of the oCTMP [REP4-057] and Annex I of the Transport Assessment [REP4-037] for highway improvement areas along Alderton Road and Fosse Way with annotations for the carriageway widths and areas of widening. However, details of the surface treatment for the widening areas is absent from the legend on the drawings and description of works in Table 7 of the oCTMP/ Table 13-20 of the Transport Assessment. Presumably if low lying grasses and edge of carriageway gravel are being removed to create passing bays, the widened area will need to be laid and finished with asphalt (or similar) to base course, binder course and surface course to match the adjoining highway. The applicant is asked to confirm and include the detail in	Further to submission at Deadline 5, details of the surface treatment for the widening areas is now included in the legend on the drawings and the description of works in Table 7 of the Outline CTMP [REP5-083] and Table 13-20 of the ES Volume 3, Appendix 13-1: Transport Assessment [REP5-061] has been updated. The widened areas will be laid and finished with asphalt to base course, binder course and surface course to match the adjoining highway.

ExQ2	Question to:	Question:	Applicant's Response
		Table 7 of the oCTMP/ Table 13-20 of the Transport Assessment and on the relevant drawings. Whilst it is noted that this question is posed to the Applicant, the council's comments on the latest drawings in Annex I to the Transport Assessment (Rev 4) have been provided in the response to the Deadline 4 documents. With respect to the latest drawings showing the Alderton Road works (Drawing PL302) it was stated "<i>Drawing PL302 shows the passing place proposals along Alderton Road. The Overview plan shows nine proposed locations for localised carriageway widening, with dimensioned details now shown in Insets 1-9. All these inset details show a passage length of circa 20m or greater and width throughout of 6.0m or more. This is considered adequate to pass two 16.5m articulated HGVs in all cases, although at detailed design stage the undertaker would be asked to confirm this with a swept path analysis through each location as part of the suite of drawings for technical approval. Details of the construction make-up and 'tie-</i>	

ExQ2	Question to:	Question:	Applicant's Response
		<i>in' to the existing carriageway in these locations is not considered necessary at DCO approval stage. What is proposed will depend to some extent on whether the widening works are deemed to be permanent or temporary. Given that HGV trafficking along Alderton Road will continue during the operational phase after the construction phase is completed, it is the council's highways development management officer's opinion that retaining these passing places as permanent works would be preferable".</i> Whist the Examining Authority are asking for details of the surface treatment to be added, this is considered a matter which can be agreed at detailed design, although it will be an asphalt surface. Note that the same surfacing details are not provided on drawings showing the new access points to the Solar PV sites or modifications to any existing field gate accesses. This again is a detailed design matter together with kerbing and the underlying pavement construction.	

ExQ2	Question to:	Question:	Applicant's Response
TT2.6	The Applicant	Highway Improvement Works Q2 Following ExA questions at ISH3, the ExA appreciates the applicant updating the oCTMP [REP4-057] to confirm the extent of works required at the B4039 at The Gibb on Drawing No. PL404 in Appendix E, which is also noted in Table 7 of the oCTMP as location B4039 at the Salutation Inn, Castle Coombe. The updates state that the works include removal of existing vegetation on the inside corner (in front of the property known as Firs Farm). While the applicant confirmed at ISH3 that the vegetation is within the public highway and not part of the Firs Farm property, it is nonetheless seemingly maintained by that property. The ExA has read the applicant's response to ISH3 Action Point 2 relating to dialogue with Firs Farm [REP4-086] but this response suggests that the correspondence issued to Firs Farm to date is generic consultation/ project update material, and not specifically about the impacts on this particular property and its curtilage. The ExA therefore seeks	The AIL delivery is subject to an agreement outside of the DCO under a special licence order. In regards the remainder of the question please refer to TT2.6 in Applicant's Response to the Examining Authority's Second Written Questions [REP5-097].

ExQ2	Question to:	Question:	Applicant's Response
		assurances that dialogue with the owners of that property has taken place on the matter of this vegetation removal to facilitate the highway improvement area (provide evidence of specific correspondence on this matter) and that the vegetation will either be reinstated, subject to the satisfaction of the owners of Firs Farm and highway authority approval, or the owner will be compensated. Whilst it is acknowledged that this question was posed to the Applicant, it is noted that the AIL vehicle swept paths in both directions will require wheel overrun to the existing kerbs, so potential damage to these given the multi-axle trailer needed. Overrunning plates are proposed to prevent verge damage, but whether this is acceptable will be down to the Council's Network Management team in approving mitigation measures to be put in place. It is noted that a large part of the highway verge adjacent to Firs Farm will be subject to body overhang, so it may be necessary to clear any vegetation or trim to a very low height. Whilst accepting this is highway verge, it would be seem common	

ExQ2	Question to:	Question:	Applicant's Response
		courtesy to consult directly with the owners of Firs Farm if they undertake informal maintenance of any planting which will be directly affected.	
TT2.7	The Applicant	Highway Improvement Works Q3 The ExA remains concerned about the lack of appraisal and commitment to possible highway improvement works on parts of the rural roads construction route network between the road east of Hullavington and Bradfield Cottages, particularly (but not limited to) the point where the road passes under the railway bridge in the direction of the Flying Monk Tap and Cafe. As observed by the ExA on its site inspections and as highlighted by Wiltshire Council at ISH3, this stretch of road currently offers no refuge, footway, or safe passing place for vulnerable road users, creating dangerous conditions even under current traffic volumes. The ExA is seeking specific commentary on what options the applicant has considered for this section of road, and what if any safety improvements can be made. In addition, what construction period	Please refer to TT2.7 in the Applicant's Response to the Examining Authority's Second Written Questions [REP5-097]. In addition, another NMU survey was undertaken and the results will be submitted at Deadline 6 in the form of a technical note titled Highways Technical Note – Non-Motorised User Surveys [EN010168/EXAM/9.70]. The findings are similar to previous surveys.

ExQ2	Question to:	Question:	Applicant's Response
		control or monitoring commitments could be considered for this stretch of road to ensure that it is under continuous safety assessment during the construction (and replacement) period? Whilst it is acknowledged that this question was posed to the Applicant, the council wishes to highlight that this very much remains a council concern. As part of the review of the latest drawings in Annex I to the Transport Assessment, the council has noted in respect of Drawing PL305 that <i>"Drawing PL305 shows the existing carriageway width analysis for the Lime Down D access route between Dyson Roundabout and Bradfield Cottages. The drawing clearly illustrates the narrow section between The Street junction and the sharp bend to the north-west, where any pedestrians walking in the carriageway have no opportunity to step clear due to the banked verges. However, it is accepted that mitigating this by widening will be impractical. However, beyond this bend, the next available passing place for two HGVs is not reached until the railway bridge, so it is</i>	

ExQ2	Question to:	Question:	Applicant's Response
		<i>considered the flat lengths of verge between will be at risk of regular over-run damage with regular HGV trafficking. To the north of the Flying Monk café access, the extremely limited opportunities for passing two large vehicles is very evident. As such, previous views about the need for some widening mitigation to these parts of the route are re-iterated."</i>	
TT2.8	The Applicant	Grittleton Crossroads AIL Swept Path At ISH3 the ExA identified that there seemed to be no swept path drawing for AIL vehicles turning left at Grittleton Crossroads into Alderton Road, rather that the only drawing provided for this location showed a right hand turn at the crossroads towards Yatton Keynell or a left hand turn from Yatton Keynell onto the unnamed road back towards The Gibb. The applicant has subsequently stated in its post hearing note [REP4-086] that <i>the AIL swept path for Grittleton Crossroads is set out in Annex H of ES Volume 3, Appendix 13-1 Transport Assessment [REP3-065] (page 956)</i>. The plan referred to by the applicant is	Please refer to TT2.8 in the Applicant's Response to the Examining Authority's Second Written Questions [REP5-097]. Regarding the turn into Alderton Road the AIL vehicle has a cab at the front and back, therefore is turns south then the cab unhitches and turns around and pulls the AIL forward into Alderton Road. This manoeuvre is common with large modular AIL vehicles.

ExQ2	Question to:	Question:	Applicant's Response
		the same plan that the ExA was referring to at ISH3. It shows a 16 Axle Girder Frame Abnormal Load Carrier at Grittleton Crossroads but no swept path turning left into Alderton Road. The ExA can only assume that this AIL cannot take a left turn, so instead would have to turn right at the crossroads towards Yatton Keynell and unhitch the cab from the front-end and re-hitch at the back to enable the AIL vehicle to be able to proceed north along Alderton Road. If this is the case, the ExA would like this confirmed. Also, if this is the case, the ExA would like to understand where the cab would turn around to facilitate this procedure and whether there is sufficient width alongside the waiting carrier for the cab to pass alongside to enable re-hitching without any need for road widening in this location. Of course, if un-hitching and re-hitching is not intended, it remains that there is no swept path drawing for an AIL left turn at the Grittleton crossroads into Alderton Road, and one should be provided.	

ExQ2	Question to:	Question:	Applicant's Response
		Whilst it is acknowledged that this question was posed to the Applicant, the council agrees that this is key point that does need clarification, as the latest Figure 13.5 'Abnormal Load Routes: Solar PV Sites (Rev 2) shows that the AIL route to Lime Down areas A-C is via this junction (Orange Route). It does not imply that negotiating this junction requires an AIL vehicle to route south of the junction to a possible turnaround point. Looking at Drawing PL406, it does seem that executing the left turn into Alderton Road will be extremely difficult for a 16-axle AIL vehicle 45.8m in length.	
TT2.9a	The Applicant Wilshire Council Stop Lime Down	ISH3 Action Points 7 and 8 At ISH3, the ExA issued Action Point 7 to the applicant to provide a set of plans showing which parts of the construction route(s) would fail to meet the highway code requirements for passing non-motorised users (NMUs) with sufficient verge protection buffer, and/ or to provide a log of the locations and the length of those locations that would not provide sufficient passing space for each of the NMUs (with	The Applicant notes WC agreement of PL302.

ExQ2	Question to:	Question:	Applicant's Response
		verge protection buffer) in line with the highway code. On page 19 of the applicant's written summary of oral submissions at ISH3 [REP4-086] the applicant records part of that discussion, noting that <i>the ExA directed the applicant for deadline 4 to identify areas where the road is not 5.5 metres wide on the plans, using a red box around those areas.</i> This is a slightly different version of the discussion, but nonetheless, at the top of page 20 of its post hearing note, the applicant then states that it has <i>provided</i> <i>additional plans in Annex I of ES Volume 3 Appendix 13-1: Transport Assessment [EN010168/APP/6.3] (Revision 4) (Drawing PL109B) which shows the width of construction routes; and Appendix E in the Outline Construction Traffic Management Plan [EN010168/APP/7.22] (Revision 4) which includes proposed Highway Improvement Area Drawings for road widening and AIL movements.</i>	

ExQ2	Question to:	Question:	Applicant's Response
		The ExA notes that the citation to Drawing PL109B is incorrect as no such plan number is included in Annex I of the Transport Assessment [REP4-037], and similarly no such drawing number is provided in Appendix E of the oCTMP either [REP4-057]. Whilst the ExA notes that Drawing Nos. PL302, PL303, PL304, PL305, PL306 and PL309 included in Annex I of the Transport Assessment [REP4-037] appear to now show either passing bays and/ or dimensions of various parts of some of the construction routes, this is not strictly in accordance with ISH3 Action Point 7, although drawing numbers PL302, PL303 and PL304 appear to address ISH3 Action Point 8. <u>The Applicant:</u> 1) The applicant is requested to confirm whether another drawing specifically addressing Action Point 7, e.g. Drawing PL109B referred to in its ISH3 Note, should have been provided, or whether reference to that drawing is an error, with drawing numbers PL302, PL303, PL304, PL305,	

ExQ2	Question to:	Question:	Applicant's Response
		PL306 and PL309 instead intended to fulfil Action Point 7? 2) The applicant is also requested to advise whether the existing road widths shown on the latest drawings referred to above were actually measured on site? Wiltshire Council and Stop Lime Down: 3) Advise whether drawing nos. PL302, PL303 and PL304 now provide sufficient dimensions and details to the satisfaction of the parties to demonstrate sufficient passing space on Alderton Road and the Fosse Way, in accordance with ISH3 Action Point 8. Comments on drawing numbers PL305, PL306 and PL309 are also welcomed. The ExA is particularly interested to understand if additional drawings, dimensions or annotations are still required (and why) (including whether colour-shaded route sections, as per Wiltshire Council's suggestion at ISH3 and its post hearing submission [REP4-092] remain necessary).	

ExQ2	Question to:	Question:	Applicant's Response
		Full comments of the latest Transport Assessment (Rev 4) and drawings in Annex I issued at Deadline 4 have been prepared for Deadline 5 by the council. However, in answering question (3) in summary: 171. Drawing PL302 showing the works along Alderton Road is considered satisfactory. The Overview plan shows nine proposed locations for localised carriageway widening, with dimensioned details now shown in Insets 1-9. All these inset details show a passage length of circa 20m or greater and width throughout of 6.0m or more. This is considered adequate to pass two 16.5m articulated HGVs in all cases, although at detailed design stage the undertaker would be asked to confirm this with a swept path analysis through each location as part of the suite of drawings for technical approval. As noted in the earlier comment on TT 2.5, design details	

ExQ2	Question to:	Question:	Applicant's Response
		such as surfacing, kerbing and pavement make-up / tie-in can follow.	
TT2.9b	The Applicant Wilshire Council Stop Lime Down	172. There are still concerns and queries with Drawing PL304 showing the works along Fosse way (South). Proposed passing locations shown on Insets 3-6 seem quite close together when looking at the Overview plan, although the drawing does not indicate the relative spacing between these passing points. However, it is noted that Inset locations 4 and 6 are effectively at the proposed access points to Lime Down area C, so localised widening to achieve a 6.0m carriageway width at these access points may not be necessary if the sight-line spacings between Inset locations 3-5-7 are acceptable. One concern which remains is the section to the immediate north-east of the Fosse Lodge junction, where it was previously noted in reviewing the HGV swept path analyses in Annex K that "passing place spacing for 2-way HGV	This comment refers to PL303, there is good forward visibility between Inset 2 and 3 negating the need for a further widening. However, if WC requires widening between Inset 2 and 3 which is possible as the public highway land is wide in this location, then this would need to be subject to a separate highway agreement, as it is outside of the Order Limits.

ExQ2	Question to:	Question:	Applicant's Response
		passage exceeding 300m is not accepted, with this shown to be the case immediately north of the Fosse Lodge junction". The spacing between the junction (Inset 2) and the passing point proposed at Inset 3 still seems quite lengthy.	
TT2.9c	The Applicant Wilshire Council Stop Lime Down	173. There remain queries and concerns with Drawing PL304 showing the proposed passing place improvements along the northern part of Fosse Way. The dimensional details of the proposed passing space works shown in Insets 1, 4 and 5 all appear acceptable, although the available passing length of circa 15m shown in the Inset 3 location is considered insufficient to accommodate the clear passage of two 16.5m articulated HGVs. It is not clear why the proposed works to the existing field gate access shown in Inset 2 would be necessary given the proximity of the Inset 3 works. Furthermore, the works shown in Inset 5 are shown to be very close to the	The Applicant has extended inset 3 in PL304 B to 20m and this is submitted at deadline 6. Inset 3 includes minor widening and creates another passing place so has been left in. Insets 5 and 6 essentially create a longer passing area with only very minor widening at 5. Inset 6 is being to be retained at its existing width. Inset 7 shows a 17.9m length of 6m wide road. Enough to accommodate a 16.5m articulated vehicle. The vehicle drives into it then another vehicle can pass. The widening at Inset 8 has been proposed around a swept path assessment.

ExQ2	Question to:	Question:	Applicant's Response
		existing passing bay shown in Inset 6. The existing driveway access shown in Inset 7 is not considered large enough to pass two HGVs, so it is noted a long narrow length of Fosse Way exists between locations shown in Insets 6 and 8. Widening works at the junction between Fosse Way and the road to Sherston are certainly required (Inset 8). Whilst what is shown appears adequate, it needs to be demonstrated with a supporting swept path analysis that an articulated HGV travelling south from Lime Down A and turning right could do with an opposing HGV waiting at the junction on Fosse Way in a position where the driver is able to see along this road to the first available passing place some 125m to the NW.	
TT2.9d	The Applicant Wilshire Council	As far as drawings PL305, PL306 and PI309 are concerned, the council consider that the Applicant's notation used to indicate a carriageway width of 6.0m or greater (blue box), or 5.5m in width or greater (red box), with distances indicated, is acceptable as an	The Applicants notes agreement to the submitted drawings and confirms the proposed widening works are temporary. The Applicants survey data was undertaken by experienced independent survey companies, using the

ExQ2	Question to:	Question:	Applicant's Response
	Stop Lime Down	alternative means of displaying the information suggested by the council. The reasoning for the council's suggested approach, so the bespoke shading of sections with a carriageway width >5.5m and between 4.8-5.5m, was to indicate precisely those lengths with a width capable of passing two HGVs and a car / HGV, with the unshaded lengths showing lengths where clear passage for even a car / HGV is not possible. In other words, this would have provided a full route analysis which these plans do not. It is also noticeable, and since confirmed by the Applicant, that these plans are not an assessment of the existing situation, so the existing carriageway widths available, as PL306 (Alderton Road / Fosse Way) assumes the inclusion of the proposed passing space improvements in Drawings PL302-304. It is considered that it would have been useful to see the same assessment based on the existing carriageway widths only, which would then show the degree of improvement which the HIA changes achieve. In commenting on these drawings submitted at Deadline 4 (so	most up-to-date and sophisticated Trimble Robotic surveying equipment, GPS Glonass receivers and Faro 3D scanners along with the latest data collection technologies available. The survey is carried out in accordance with BSENISO9001:2000. Unless the SLD survey has been undertaken with this level of accuracy, it is unlikely the measurements will match.

ExQ2	Question to:	Question:	Applicant's Response
		the Deadline 5 response) the council makes the point that latest Wiltshire Highway comments are based on the explicit assumption that the Applicant's assessment of these existing carriageway widths is fully accurate. Wiltshire Council has not undertaken its own detailed carriageway width measurements along the narrow rural lanes in question or instructed any independent survey to be done as a means of verifying the Applicant's assessment. However, the council are aware that the transport consultants acting for Stop Lime Down have been undertaking their own measurements, so the council will in due course expect these measurements to align.	
TT2.11	The Applicant	Shuttle Bus Take-Up Q1 The ExA notes that within the construction worker travel plan, at Appendix C to the oCTMP [REP4-057], the applicant states that it is anticipated the majority of non-local construction workers will stay at local accommodation and be transported to Order limits by shuttle bus. At paragraph 3.2.10 of the oCTMP the applicant adds that for the	Please refer to TT2.11 in the Applicant's Response to the Examining Authority's Second Written Questions [REP5-097] .

ExQ2	Question to:	Question:	Applicant's Response
		purposes of the assessment, it has been assumed that 50% of workers will arrive by shuttle bus (or 622 workers, as detailed in Table 5 of the oCTMP). 1) Can the applicant explain what geographical area has been used to define local and non-local in this situation? 2) Can the applicant also confirm if the anticipated 50%/ 622 worker shuttle bus take-up is comprised of only non-local workers staying in local accommodation, or if those figures also include a proportion of local workers who may also wish to use the shuttle service? If the latter, please provide the proportional split between local and non-local workers anticipated in the 50%/ 622 worker take up figures. 3) Advise what assessments have been undertaken on the location and availability of local accommodation for non-local workers for the duration of the construction period and present this evidence.	

ExQ2	Question to:	Question:	Applicant's Response
		Whilst it is acknowledged that this question was posed to the Applicant, previous Highway comments from the council on the distribution of worker trips have been made in reviewing Revision 3 of Environmental Statement Volume 1, Chapter 13 Transport and Access, which remain applicable with Revision 4. It has been stated "<i>Table 13-23 shows the magnitude of the daily construction traffic movements expected along various routes. As noted in the past, whilst the HGVs will be forced to use the prescribed construction routes to the Lime Down Solar Park areas, it seems improbable that light vehicle trips associated with workers will be similarly channelled to just these routes. A wider distribution would be expected and more plausible</i>". In short, the 'origin' locations for workers subsequently employed on Lime Down may be quite dispersed, although there may be some concentrations in the larger urban centres close to the area, such as Chippenham. This could make it difficult to run an effective 'shuttle' bus service catering for 50% of	

ExQ2	Question to:	Question:	Applicant's Response
		the workforce which is deemed more convenient than using a private / car van to get to the Solar PV sites.	
TT2.12	The Applicant	Shuttle Bus Take-Up Q2 In response to ExQ1 TT1.8, Wiltshire Council [REP3-142] noted that at the project's scoping stage it advised the applicant that a 50% worker take-up rate for the shuttle bus was high and would prefer to see a lower shuttle bus assumed mode share of say 20%. The applicant ignored the Council's scoping opinion on this matter and the ExA's own request in ExQ1 TT1.8 to provide assurance that the figures underpinning the applicant's Transport Assessment are realistic. However, as confirmed by the applicant's transport expert at ISH3, actual traffic information (rather than modelled or assumed) from other similar solar schemes (such as Cleve Hill) is not publicly available, therefore assumptions have to be made. The ExA's view, nonetheless, is that by assuming such a high shuttle bus take-up rate, the applicant may not have	See response to TT2.12 in the Applicant's Response to the Examining Authority's Second Written Questions [REP5-097]. The Applicant acknowledges the comments from WC that HGVs and the ability to accommodate safe and satisfactory two-way passage for these remains the key Council concern.

ExQ2	Question to:	Question:	Applicant's Response
		assessed a 'worst case' traffic loading on local roads. The applicant is requested to advise how the 50% take-up rate is the worst-case assessment, and as asked in ExQ1 TT1.8, the ExA wishes to understand how the applicant intends to deal with low shuttle bus uptake if it arises? Whilst it is acknowledged that this question was posed to the Applicant, it is the council's view that that by assuming such a high shuttle bus take-up rate, the Applicant has not assessed a 'worst case' traffic loading on local roads in terms of light vehicle construction traffic. Given that, as now advised, actual traffic information (rather than modelled or assumed) from other similar solar schemes (such as Cleve Hill) is not publicly available, a lower mode share for shuttle bus usage should have been assumed. Notwithstanding this, it is considered unlikely that the extra light vehicle traffic which could result from increased private car / van usage by workers	

ExQ2	Question to:	Question:	Applicant's Response
		would itself lead to capacity exceedance issues on the local roads. The numbers of HGVs and the ability to accommodate safe and satisfactory two-way passage for these remains the key Council concern.	
TT2.13	The Applicant	Construction Phasing Table 1 of the oCTMP [REP4-057] shows the construction of the 400kV substation being constructed in the first 6 months of the construction programme. The applicant noted in paragraph 2.1.30 of its deadline 3 response to Stop Lime Down [REP3-133] that whilst this is subject to change, this period was selected to represent the realistic worst case scenario for assessment as it provides a higher peak value than spreading trips across a two year period. Nonetheless, Stop Lime Down has noted in its deadline 4 submission [REP4-132] that at a meeting between the applicant and Stop Lime Down on 23 June 2026, the applicant's transport expert conceded that the timescale for the 400kV substation construction would likely be similar to the BESS, around 2 years, which means that the 400kV substation	The Applicant clarifies that the construction programme for the 400kV substation has been refined to reflect a more realistic 20-month build-out period, aligning with the timeframe for the Battery Energy Storage System (BESS). While the original six-month estimate was utilised to present a conservative scenario by concentrating trips into a shorter window, the updated Highways Technical Note [REP5-107] submitted at Deadline 5 accounts for this elongated sequencing. The Applicant reiterates that the peak workforce of 622 was distributed proportionally across the solar PV sites based on area to establish a documented assessment baseline. As set out in Applicant's Response to Submissions Received at Deadline 4 [REP5-098], a validation check was performed comparing daily peaks within any given month against this distributed 622 figure, confirming that actual peaks remained lower than the assessed values. This methodology ensures that the transport assessment captures a worst-case

ExQ2	Question to:	Question:	Applicant's Response
		would be constructed concurrently with Lime Down D and E and the BESS. As identified by the ExA in ExQ1 TT1.7 the ExA is already concerned about the applicant's distribution of construction worker numbers proportionally across the solar PV sites in the transport assessment, for as has been identified by other IPs, the 400kV substation and the BESS, which are both in Lime Down D, are likely to attract well above the average number of workers for the solar sites. Therefore, the applicant is asked to explain the implications of an elongated substation construction period in terms of daily and peak flows of HGVs and light vehicle construction traffic from Dyson Roundabout to Bradfield Cottages, including the chances of HGVs meeting on that road. Whilst it is acknowledged that this question was posed to the Applicant, the council considers that the number of workers employed (622), or indeed their distribution across the five Lime Down areas is not seemingly linked to 'peak' periods of activity on any one site (so whether the 400kV substation build-out takes 6-months	peak worker trip scenario for every day of the construction period, providing a buffer regardless of localised fluctuations in site specific activity.

ExQ2	Question to:	Question:	Applicant's Response
		or 2-years). As previously stated, it would seem more plausible and likely that Lime Down D would employ a greater proportion of the overall workforce than is being assumed by proportioning this distribution using relative site areas. If the build-out of the 400KV substation extends to 2-years, then this higher proportion of the workforce would remain at the Lime Down D site throughout the proposed construction period.	

Table 2-2 Wiltshire Council: Comments on Submissions Received at Deadline 5

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
WC-001	Transport and Access	Works Plan	1. 2.3 Works Plans 1.1. It is noted that there is no Applicant submitted Deadline 4 update to the 23 number works plan drawings identifying works proposed within public highway as Works Numbers 8A or 8B. As noted in past highway comments by the council, it is inferred that where lengths of public highway are excluded from these designations on the Works Plan, no mitigation or improvements are deemed necessary by the Applicant to accommodate the increased HGV trafficking expected during construction. This seems rather at odds with the latest Transport Assessment (Rev 4) [REP4-038], where passing bay works are indicated along lengths of the Fosse Way in addition to works at proposed access points to Lime Down Areas B and C.	In response to ISH3 and comments from the Examining Authority, further information on road widths and widening has been provided in Annex I and Annex K of ES Volume 3, Appendix 13-1: Transport Assessment [REP4-037] at Deadline 4 including Drawings PL302-PL304 and Drawings PL305 PL308. The areas of Work Numbers 8A and 8B have been identified as areas of the highway where works, including highway improvement areas, are required. Highway works outside of these areas may be carried out under the powers in the draft DCO, with the consent of the highway authority, as discussed during Written Summary of the Applicants Oral Submissions and Responses at Issue Specific Hearing 3 and Responses to Action Points [REP4-086] and Written Summary of the Applicants Oral Submissions and Responses at Issue Specific Hearing 4 and Responses to Action Points [REP4-087].

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
WC-002	Transport and Access	Draft DCO	2. 3.1 Draft Development Consent Order (Rev 4) [REP4-005] and 3.2 Explanatory Memorandum (Rev 4) [REP4-007] Article 10 2.1. Article 10(4) now states that: "The powers conferred by paragraph (2) must not be exercised without the consent of the street authority, such consent to be in a form reasonably required by the street authority". The amendment to replace 'may' with the word 'must' is welcomed. This might usefully also cross-reference the said LHA Protective Provisions in Part 11 to Schedule 15.	The Applicant refers Wiltshire Council to its response given at WC1-002 in the Applicant's Response to Submissions Received at Deadline 4 [REP5-098] .
WC-003	Transport and Access	Draft DCO	2.2. However, as discussed at ISH4 and set out in the council's position in Agenda Item 2.3, the council do not see why it should be necessary for Article 10 of the DCO to confer powers under (2) to alter the "alter the layout of any street", so not just the streets identified with the Work Area plans and within the DCO Order Limits. Whilst Article 10(4) requires the Applicant to consult with the street authority, with the consent process to be in a form reasonably required by the street authority, the	The Applicant refers Wiltshire Council to its response given at WC1-003 in the Applicant's Response to Submissions Received at Deadline 4 [REP5-098] .

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			6-week limit for determination / approval under Article 47(3) is a real concern as the council will have no idea as to the scale or complexity of any highway works outside the DCO Order Limits which the Applicant may seek to propose in the future. It is unclear whether Schedule 16 is to apply in respect of highway technical approvals or consents.	
WC-004	Transport and Access	Draft DCO	Article 11 2.3 There are no changes to this clause in Revision 4 to the dDCO so previous Highways Development Management comments apply. See also the comments concerning this Article at ISH4 (Agenda Item 2.4) below. It is accepted that completed works may be subject to ongoing HGV construction trafficking associated with the wider development following the expiry of the 12-month maintenance or defects period. As such, the risk of consequent damage by construction trafficking to highway works completed early in the construction phase is an issue. The council is seeking a formal s59 Agreement (Highway Act 1980) within the DCO to cover potential	The Applicant refers Wiltshire Council to its response given at WC1-004 in the Applicant's Response to Submissions Received at Deadline 4 [REP5-098] .

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			damage to this wider network caused by extraordinary trafficking. If this is in place, then this would potentially cover damage defects liability for included road lengths which have been subject to construction trafficking beyond the 12-month period.	
WC-005	Transport and Access	Draft DCO	Article 14 2.4. There is again no drafting change made to this Article in this revision to the dDCO. The clause implies that approval by the highway authority is only required for new access locations proposed beyond those set out in Schedule 7, Parts 1 and 2, so all those listed in Schedule 7 deemed approved in at least principle under powers conferred in Article 14. This current level of design is insufficient, but the addition of the Local Highway Authority Protective Provisions in Part 11 to Schedule 15 (subject to final agreement) includes the requirement for technical approval of all works drawings (including Schedule 7 works) and associated Road Safety Audits. It would thus be helpful to make clear in sub-clauses 14(a) and 14 (b) that detailed design approvals must still	The Applicant refers Wiltshire Council to its response given at WC1-005 in the Applicant's Response to Submissions Received at Deadline 4 [REP5-098] .

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			be sought in accordance with the LHA Protective Provisions in Part 11 to Schedule 15, as it otherwise implies that they do not apply.	
WC-006	Description and DCO Process	Draft DCO	Article 15 2.5. Article 15 is also unchanged in this revision to the dDCO so previous comments remain.	The Applicant refers Wiltshire Council to its response given at WC1-005 in the Applicant's Response to Submissions Received at Deadline 4 [REP5-098]. The Applicant notes the numbering error in REP5-098 (WC1-005 is duplicated) and, for clarity, its response with regard to Article 15 appears on page 423 of that document.
WC-007	Arboriculture	Draft DCO	Article 40 and Schedule 12 2.6. It is evident that the changes made to the draft DCO (Rev 4) do not address the comments made by the council at Deadline 3 or preceding deadlines. 2.7. As stipulated in the council's Comments on Deadline 3 submissions [REP4-091] and in its Post Hearing Summaries and Responses to Action Points [REP4-092], the council considers that evidence is still lacking to substantiate why it is necessary to list every hedgerow within the Order Limits, if as the Applicant advises, all	The Applicant refers Wiltshire Council to its response given to EB2.11 in the Applicant's Response to the Examining Authority's Second Written Questions [REP5-097].

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			hedgerow removal will be controlled by the provisions of Article 40(4) and be undertaken in accordance with that prescribed within the EPMS. The council again questions the adopted approach to Schedule 12 and why the overly wide powers afforded by Schedule 12 are in fact needed and why the extent of removal cannot be refined within the schedule. The council considers that it should, at the very least, be possible to specify in column (2) of Part 1 and Part 2 of Schedule 12, a range of hedgerow removal i.e. a minimum and maximum extent of hedgerow that may need to be removed from each of the hedgerows listed. This should be possible given the provisions of Article 40(4) and the footnotes in Schedule 12.	
WC-008	Arboriculture	Draft DCO	2.8. Furthermore, in the council's Comments on Deadline 3 submissions [REP4-091], as well as in Wiltshire Council's Relevant Representation [RR-4934], the council highlighted that the proposal that hedgerow removal within the section of the cable route corridor (CRC) that coincides with the Bath and Bradford-on-Avon Bat SAC consultation zone will be restricted to 10m has not been transposed into the relevant	The Applicant refers Wiltshire Council to its response given to DCO2.10 in the Applicant's Response to the Examining Authority's Second Written Questions [REP5-097].

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			rows in the respective table in Schedule 12. It is apparent that this request has still not been fulfilled. As specified in previous representations, it is the council's view that the omission of the proposed restrictions to hedgerow removal as set out in the HRA, from the relevant rows of Schedule 12 undermines confidence that the measures set out in the HRA will actually be delivered, despite the footnotes added to Schedule 12, Part 1 and Part 2 and the provisions of Article 40(4). The council remains unclear and unconvinced as to why continuity across the dDCO, the EPMS and the HRA has not been deemed permissible by the Applicant if the Council and ExA are to have certainty that Article 40(4) and the footnotes to Schedule 12 will be adhered to strictly.	
WC-009	Arboriculture	Draft DCO	Article 41 2.9. Wiltshire Council Arboricultural Officers maintain that sufficient prior notification of works to protected trees is required to ensure that:	The Applicant has provided a response in respect of Article 41 above at DCO2.12a.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			• Local Planning Authority records remain accurate and up to date; • Replacement planting requirements can be monitored; • Replacement trees can be inspected to ensure successful establishment; and • Compliance with relevant tree protection legislation and consent conditions can be adequately monitored. 2.10. The Applicant should therefore clarify: 1) What formal mechanism will be used to notify the Local Planning Authority of proposed works affecting protected trees (for example, submission of a 5-Day Notice or an alternative agreed procedure)? 2) Which officers within the Local Planning Authority will receive such notifications? • Arboricultural Officers; • Planning Officers;	

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			Both. 2.11. A clear reporting and communication protocol should be established within the management documentation.	
WC-010	Construction and Decommissioning	Draft DCO	Schedule 2: Requirement 2 (Phasing) 2.12. The council reiterates its previously expressed requirement for dDCO to include the following drafting: "No part of the authorised development may commence until a phasing scheme has been submitted to and approved by the relevant planning authority and thereafter the authorised development must be carried out in accordance with the approved phasing scheme."	As the Applicant has explained, the purpose of the provision of the phasing scheme is to inform the Council of the construction phases in advance of construction commencing. It is not intended that the Council has any role in the approval of the construction phases.
WC-011	Hydrology, Flood Risk and Drainage	Draft DCO	Schedule 2: Requirement 11 (Surface and Foul Water Drainage) 2.13. The council considers that Requirement 11 should be future-proofed by reference to whatever standards are applicable at the date of submission or at amendment from time to time. Therefore it should state:	The process for discharging detailed management plans that must be substantially in accordance with outline management plans already allows for standards applicable at the time of discharge to be incorporated into the detailed version of the relevant plan. As the LLFA is now a consultee for the discharge of the detailed drainage strategy, it is able to, together with the Environment Agency, specify

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			"11—(1) No part of the authorised development may commence until written details of the surface water and drainage scheme, and if applicable, the foul water drainage system for that part have been submitted to and approved in writing by the relevant planning authority following consultation with (a) The Environment Agency; and (b) The lead local flood authority. (2) The written details submitted under subparagraph (1) must— (a) be substantially in accordance with the outline drainage strategy; (b) demonstrate compliance with the National standards for sustainable drainage systems (as amended, supplemented, or replaced from time to time) published by the Department for Environment, Food and Rural Affairs applicable at the date on which the plans are submitted to the drainage authority for approval and (c) include arrangements for the management, maintenance and operation of	which standards it considers must be complied with that must be captured within the detailed version of the drainage strategy.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			the surface water drainage system throughout the construction, operation and decommissioning of the relevant part of the authorised development. (3) Any approved scheme must be implemented, managed and maintained as approved."	
WC-012	Construction and Decommissioning	Draft DCO	Schedule 2: Requirement 20 (Decommissioning and Restoration) 2.14. The council welcomes the amendments made to this Requirement by the Applicant in this revision, and notes the further information and clarification provided in the Applicant's Post Hearing Submission for ISH4 at Action Point 7 [REP4-087] regarding the council's powers under the Planning Act 2008. 2.15. Discussions are ongoing with the Applicant to provide the council with the comfort it seeks to ensure that the cost of any decommissioning works, should the council be required to step-in, will not fall on the public purse.	The Applicant has discussed the provision of information relating to decommissioning securities with Wiltshire Council and included this commitment in the draft Section 106 Agreement. This will enable the information to be kept confidential as it is commercially sensitive. The Applicant awaits Wiltshire Council's comments on the draft Section 106 agreement.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
WC-013	Transport and Access	Draft DCO	Schedule 15 – Part 11 2.16. The council notes the inclusion of Applicant's proposed Protective Provisions for the Protection of the Local Highway Authority in Part 11 of Schedule 15. This is a matter under ongoing discussion with the Applicant, as the contained drafting is not agreed by the council. 2.17. Please also see the council's response to the ExA's Second Written Questions, which are included within a separate submission.	The Applicant received Wiltshire Council's latest comments on the Protective Provisions on 11 August 2026. The Applicant has been in the process of reviewing these and negotiations are progressing well. The Applicant has included its preferred version of the Protective Provisions at Deadline 6 within the Draft DCO [EN010168/APP/3.1] (Revision 6). The Applicant will provide its detailed response to Wiltshire Council's latest comments on the draft Protective Provisions shortly following Deadline 6.
WC-014	Ecology and Biodiversity Arboriculture	Hedgerow Surveys	3. 6.1 ES Volume 1, Chapter 9 Ecology and Biodiversity (Rev 3) [REP4-011] 3.1. Table 9-3: Field Survey Scope and Schedule – Solar PV Sites has been amended to include a brief description of the methodology undertaken for hedgerow surveys and for determining whether hedgerows qualified as “important” under the Hedgerow Regulations 1997. Paragraph 9.6.16 has also been amended to include the same brief description in relation to hedgerow surveys within the CRC. It is recognised that a	The Applicant notes this comment regarding amendments to ES Volume 1, Chapter 9: Ecology and Biodiversity [REP4-010] submitted at Deadline 4.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			full methodology is provided in 6.3 ES Volume 3 Appendix 9-1 Ecological Baseline Report (Rev 3) [REP4-020].	
WC-015	Ecology and Biodiversity Arboriculture	Hedgerow Surveys	3.2. In ES Chapter 9 Ecology and Biodiversity (Rev 3) [REP4-011] under the column heading of Details (Results and Methods) in Table 9-3 pertaining to the Solar PV Sites, it is specified: "ES Volume 3, Appendix 9-1: Ecological Baseline Report [REP1-083] Results presented in 2.7 TPO and Hedgerow Plan (Change Application) (Rev 1) [CR1-016]". 3.3. In contrast, paragraph 9.6.16 pertaining to the CRC, does not state where the full methodology and results of the hedgerow survey within the CRC are presented.	The Applicant notes this comment. The full hedgerow survey methodology pertaining to surveys within the Cable Route Corridor is also presented within ES Volume 3, Appendix 9-1: Ecological Baseline Report [REP4-019] , and results are presented within the TPO and Hedgerow Plan [REP5-010] .
WC-016	Ecology and Biodiversity Arboriculture	Hedgerow Surveys	3.4. Furthermore, despite the inclusion of a brief description of the methodology used to conduct hedgerow survey and for determining whether hedgerows qualified as "important" under the Hedgerow Regulations 1997 within the latest iteration of Chapter 9, the associated results and details of the hedgerows which have been identified as "important" and / or any associated detailed discussion in terms of	The Applicant notes this comment. Detailed survey results for all survey types are presented in the supporting appendices and relevant documents, including the TPO and Hedgerow Plan [REP5-010], as described in ES Volume 1, Chapter 9: Ecology and Biodiversity [REP4-010]. ES Chapter 9 [REP4-010] presents a summary of survey

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			evaluation still seems to be omitted from the chapter. It is noted however, that paragraph 9.10.137 states: "The vast majority of hedgerows within the Solar PV Sites were classified as being 'Important' as shown in the TPO and Hedgerow Plan [EN10168/APP/2.7]."	results, provided in Paragraph 9.10.137. The Applicant maintains that 'Important' hedgerows have been appropriately considered within the impact assessment and evaluation.
WC-017	Ecology and Biodiversity Arboriculture	North Bincombe Wood	3.5. It is noted that paragraph 9.10.74 has been amended because a new access track has now been proposed to be routed through Fields E2 and E3 at Lime Down E in response to concerns raised by the council about the potential for adverse effects on the edge of North Bincombe Wood (Rodbourn Plantation County Wildlife Site (CWS)), and concerns that the required 15m buffer to this ancient woodland would not be implemented.	The Applicant notes this comment.
WC-018	Ecology and Biodiversity Arboriculture	North Bincombe Wood	3.6. In relation to the existing access track alongside North Bincombe Wood, it is noted that paragraph 9.10.74 now states: "However, it is not proposed that this track will be utilised by heavy construction traffic; instead, a new access track routing through Fields E2 and E3 is proposed. Creation of a new access will ensure no additional impacts resulting from	The Applicant notes this comment.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			construction traffic occurs within the 15 m buffer from Rodbourne Plantation LWS, avoiding the risk of damage or root compaction to the trees on the outer edge of the LWS. Creation of the new access will require minor additional loss of internal hedgerows in the affected fields, described in the Hedgerows and Lines of Trees section below."	
WC-019	Ecology and Biodiversity Arboriculture	North Bincombe Wood	3.7. Paragraph 9.10.74 therefore suggests that the intention is to avoid the use of the existing track alongside North Bincombe Wood by heavy construction traffic rather than all construction traffic. This raises concern that usage of the existing track will not be adequately avoided. This matter was discussed with the Applicant's ecological, environmental and arboricultural consultants during a meeting on 27th July 2026. The arboricultural consultant advised that a cellular confinement system would be used along the existing track alongside North Bincombe Wood. The environmental consultant advised that the track would be maintained in accordance with the Applicant's obligations to maintain access	The Applicant notes this comment. It is now the intention for upgrades to the existing track, which is a public road, to be limited to only pothole filling. The proposed usage of the existing track is to be restricted to light vehicles on an occasional basis for the purpose of light maintenance including hedgerow management, strimming etc. where required. The applicant maintains its need to use this track for the above purposes during the operational phase. Additional text confirming the proposed use of the track has been added to both the Outline CEMP [EN010168/APP/7.12] (Revision 7) and the Outline OEMP [EN010168/APP/7.13] (Revision 6) submitted at Deadline 6.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			tracks within the Order Limits. The Applicant's environmental consultant went on to suggest that the existing track would only be used for the purposes of hedgerow and / or vegetation maintenance. Whilst these points were acknowledged by the council during the aforementioned meeting, the council's arboricultural and ecology officers specified that there shouldn't be a need for such maintenance of the track given that it should be subject to minimal usage in light of the Applicant now proposing to create a new access track in order to avoid use of the existing track alongside North Bincombe Wood. The council also requested that the existing access track alongside the ancient woodland not be used by any construction traffic, not just heavy construction traffic, and that instead, the proposed new access track to be routed through Fields E2 and E3 should be used by all construction traffic given that it has been proposed for the purposes of avoiding use of the existing track next to the woodland. It is also requested that the proposed new access track is used during the operational phase	

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			instead of using the existing access track alongside North Bincombe Wood.	
WC-020	Ecology and Biodiversity Arboriculture	North Bincombe Wood	3.8. Although the existing access track adjacent to North Bincombe Wood is already used by the landowner, most likely primarily by agricultural vehicles, this is considered to be low-level use compared to the proposed use during the construction and operation of the Lime Down Solar Park scheme. It is the council's expectation that additional information and clarity will be incorporated within the DCO application documentation in this regard, and this will be reviewed by the council when made available.	The expected use for occasional maintenance by light vehicles during the operational phase should not be considered a significant impact. Additional text confirming the proposed use of the track has been added to both the Outline CEMP [EN010168/APP/7.12] (Revision 7) and the Outline OEMP [EN010168/APP/7.13] (Revision 6) submitted at Deadline 6.
WC-021	Ecology and Biodiversity Arboriculture	North Bincombe Wood	3.9. Paragraph 9.10.111, which discusses construction phase impacts on woodland, has also been updated. The Schedule of Changes at the front of Chapter 9 stipulates: "Update to reflect proposed new access track at Lime Down E, and adherence to protective buffer of woodland." 3.10. Paragraph 9.10.111 specifies that protective development-free buffers of a minimum of 15m from all woodland within or	The Applicant notes this comment regarding amendments to ES Volume 1, Chapter 9: Ecology and Biodiversity [REP4-010]. ES Chapter 9 [REP4-010] in relation to the access track alongside North Bincombe Wood. There will be no development within the buffer of North Bincombe wood, save the minimal upgrading of the track by filling in existing potholes to repair the track to previous conditions. This is to facilitate the use of light

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			adjacent to the Solar PV Sites has been designed into the Scheme and will be demarcated by protective fencing prior to commencement of construction, and that the buffers would be observed thereafter for the lifetime of the Scheme. The paragraph has been amended to specify that there is one exception as a track will be used alongside a woodland to the south of Field C22; whereas previously the paragraph had stipulated there would be two exceptions and it included reference to use of the existing access track alongside North Bincombe Wood. Paragraph 9.10.111 has therefore been amended such that it has removed reference to the intention to use the existing access track alongside North Bincombe Wood. It is worth highlighting, however, that use of the phrase 'development-free buffer' does not necessarily indicate or provide assurance that construction traffic would not be routed through a buffer or use an access track within a buffer.	vehicles for operational maintenance such as hedge trimming, strimming etc. Additional text confirming the proposed use of the track has been added to both the Outline CEMP [EN010168/APP/7.12] (Revision 7) and the Outline OEMP [EN010168/APP/7.13] (Revision 6) submitted at Deadline 6.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
WC-022	Ecology and Biodiversity Arboriculture	North Bincombe Wood	3.11. In addition, as discussed above, paragraph 9.10.74, which has also been amended, still infers that some use of the existing access track adjacent to North Bincombe Wood by the Applicant is proposed. As such, there appears to be a discrepancy between the proposals and intent detailed in paragraph 9.10.74 and those detailed in 9.10.111. This should be addressed so that it is clear what is now being proposed by the Applicant. As aforementioned, the council would prefer there to be no use of the existing access track adjacent to North Bincombe Wood by the Applicant except for the purposes of hedgerow and / or vegetation maintenance. As discussed above, it is the council's expectation that additional clarity will be incorporated within the documentation in this regard and this will be reviewed by the council once available.	The Applicant acknowledges Wiltshire Council's proposed updates relating to additional restrictions on the use of the existing access track adjacent to North Bincombe Wood. The Applicant has provided updated wording in the Outline CEMP [EN010168/APP/7.12] (Revision 7) at Deadline 6.
WC-023	Ecology and Biodiversity	North Bincombe Wood	3.12. It is recognised that under the heading 'Hedgerows and Lines of Trees' and the sub-heading 'Construction Phase Impacts', paragraph 9.10.137 has been amended to specify that an approximate total	The Applicant notes this comment.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
	Arboriculture		length of 346m of hedgerow, rather than the previously stipulated 327m, will be lost to facilitate access to particular fields / parts of the Solar PV Sites, including providing access for Abnormal Indivisible Loads (AIL).	
WC-024	Construction and Decommissioning	Cleaning of Solar PV Panels	3.13. In a previous representation, the council highlighted that there was an inconsistency between Chapter 9 and other chapters of the ES in respect of the discussion regarding frequency of the cleaning of the solar PV panels during the operational phase. Chapter 9 had assumed the panels would be cleaned every two years whereas other chapters had specified it would be every year. It is recognised that paragraph 9.10.103 of REP4-011 has now been corrected and now refers to annual cleaning of the panels. The discussion regarding the likelihood of effects as a result of the cleaning of the panels has not been amended however and continues to state: "The avoidance of chemical use and likely infrequent intervals of cleaning means that there is a negligible likelihood of effects potentially arising from this procedure, such as degradation of	The Applicant acknowledges the correction to an annual cleaning cycle and maintains that this update does not alter the original conclusion of a negligible likelihood of effects on the receiving environment. This conclusion is based on the fact that panel cleaning is an infrequent, low-impact activity that represents a conservative worst-case scenario, as many solar installations can operate efficiently with even lower frequencies or no cleaning at all. The Applicant maintains that, given panel cleaning would be undertaken using deionised water only and avoid chemical use, there is negligible potential for effects such as chemical pollution, as stated within Paragraph 9.10.103 of ES Volume 1, Chapter 9: Ecology and Biodiversity [REP4-010]. The Applicant acknowledges the potential for impacts such as soil compaction and damage to ground flora

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			habitat through chemical pollution or impacts to hydrological conditions at ground level.” 3.14. The council considers that insufficient evidence has been provided to substantiate the Applicant's conclusion that the likelihood of effects as a result of cleaning the solar PV panels annually rather than every two years, is still negligible. It is deemed possible that cleaning the solar PV panels every year, such as by means of tracked machinery, could have adverse impacts upon the ground flora and habitats, upon ground conditions and soil (e.g. as a result of compaction) and hydrological conditions, especially if the ground is wet / waterlogged or very dry.	arising from use of tracked machinery, however given that panel cleaning would be undertaken no more than once annually, the Applicant maintains that any such impacts are unlikely to result in significant adverse effects.
WC-025	Ecology and Biodiversity	Grassland	3.15. In previous representations the council had commented that the proposals detailed under the heading 'Breeding Birds Ground Nesting Birds of Open Farmland - Construction Phase Additional Mitigation Measures' had incorrectly specified that there would be large-scale creation of diverse grassland underneath and between the Solar PV Panels. It is recognised that paragraph 9.12.32 has now	The Applicant notes this comment.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			been amended and has replaced the phrase 'diverse grassland types' with 'low-input grassland types'.	
WC-026	Ecology and Biodiversity	Grassland	3.16. Nevertheless, paragraph 9.12.32 still specifies that there will be "large-scale creation of optimal foraging habitat in the form of low-input grassland types under/between Solar PV Panels and within buffer zones." Whilst it is accepted that the grassland proposed underneath and between the panels may comprise a betterment in terms of foraging habitat in those fields within the Solar PV Sites which are currently in arable production, the council is not convinced that the grassland which will be created underneath and between the panels will comprise optimal foraging habitat. In addition, fields in the Solar PV Sites which are not currently in arable production may already afford favourable foraging habitat for breeding birds, including ground nesting species and as such, the grassland attained in these fields once the solar panels have been installed may not in fact provide an improved or optimal foraging resource compared to the existing. This matter has already been raised in	The Applicant notes this comment and maintains that the creation of low-input grassland types will deliver the proposed ecological mitigation for skylark through increased value of foraging habitat within the Solar PV Sites, as set out within ES Volume 1, Chapter 9: Ecology and Biodiversity [REP4-010] . The Applicant refers to previous responses on this matter, including to WC-108 in the Applicant's Response to Relevant Representations (Part 1) [PDA-009] .

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			the council's previous representations and the council queried use of the word 'optimal' to describe the foraging potential of the grassland to be delivered underneath and between the panels. The council also raised concern that use of the word 'optimal' suggests that the grassland will confer greater benefits than will actually be attained and that this is important given the significant adverse effects on breeding birds, particularly ground nesting species, that the Solar PV Sites would cause due to loss of nesting habitat and resulting displacement.	
WC-027	Ecology and Biodiversity	Bird Habitat	3.17. The council also highlighted that the installation of the solar panels and maintenance of almost all the hedgerows across the Order Limits at a height of 4-5m above ground level (AGL) will increase availability of perch sites with good vantage points for predators and will result in the loss of open sight lines, and that this has potential to increase the risk of predation when birds are foraging. Whilst this is not a comment on the likely value and quality of the proposed grassland underneath and between the panels as a foraging resource in	The Applicant notes this comment relating to proposed hedgerow heights and suitability of skylark foraging habitat. The Applicant recognises that tall boundary features may provide potential perches for predators of skylark, however this potential increased risk of predation is considered more likely to represent a significant constraint on suitability of nesting habitat, than on skylark foraging habitat. Factors such as vegetation cover and structure, availability of foraging resources (particularly arthropods), and proximity to nest sites are

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			itself, these factors would affect the capability of the grassland in the Solar PV Sites to be 'optimal' foraging habitat for breeding birds, particularly ground nesting species.	considered to represent the most critical factors when determining suitability of skylark foraging habitat. Grassland habitats at the Solar PV Sites will be managed to optimise these factors where practicable, in line with the specifications of the Outline Landscape and Ecological Management Plan [REP5-079] . Furthermore, skylark and similar small passerines, while foraging, are not considered a primary or favoured prey item. Any increased predation risk would therefore be expected to be far outweighed by the enhancement of foraging productivity for birds such as skylark. The height of boundary features at the Solar PV Sites is not considered to significantly affect the delivery of proposed skylark mitigation through increased value of foraging habitats.
WC-028	Ecology and Biodiversity	Revised ES Chapter 9	3.18. The other amendments to REP4-011 as detailed in the Schedule of Changes at the front of the revised Chapter 9 are noted but do not require any specific discussion.	The Applicant notes this comment.
WC-029	Transport and Access	Revised ES	4. 6.1 ES Volume 1, Chapter 13 Transport and Access (Rev 4) [REP4-015] 4.1. There are only	The Applicant notes this comment.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
		Chapter 13	two changes indicated within Revision 4 as follows: • Tables 13-19 and 13-32 have been updated to indicate whether the proposed highway works are temporary or permanent; and • Paragraphs 13.10.65 and 13.10.66 have been amended to confirm the status of Cable Route Construction access points following the construction phase.	
WC-030	Transport and Access	Highway Improvement Areas	4.2. Wiltshire Council's Highways Development Management Officer has no issue with these amendments, which just serve to provide clarity. The council would, however, re-iterate comments made in respect of Revision 3 which all remain applicable with Revision 4 for completeness: • Paragraph 13.4.10: This states that "Other than the Highway Improvement Areas which form part of the Order Limits, the assessment assumes that the road network and existing services will remain the same". As stated verbally at the ISH3 Hearing, it is considered passing space improvements	For clarity, the Applicant is also proposing widening along the Fosse Way, which is outside of the HIA works on Alderton Road. The proposed widening works on Alderton Road and Fosse Way are shown in Annex I of ES Volume 3 Appendix 13-1: Transport Assessment [REP5-061]. At the request of the Examining Authority, the applicant has also submitted information at Annex I of ES Volume 3 Appendix 13-1: Transport Assessment [EN010168/APP/6.3] (Revision 6) showing locations where widths of 5.5 metres and 6.0 metres will be available.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			along the narrow rural lanes forming parts of the HGV construction access routes are needed at locations outside the HIA (which is currently limited to Alderton Road).	
WC-031	Transport and Access	HGV Movements	Table 13-20 shows the forecast number of overall HGV movements over the construction period by Lime Down SF site (and mean / 'peak' daily predictions). This remains a subject of disagreement and discussion pending the provision of more information from the Applicant on assumptions and some validation against other Solar Farm forecasts. This was also discussed at length during the ISH3 Hearing.	The Applicant notes this comment.
WC-032	Transport and Access	Shuttle Buses and Car / Light Van Movements	Table 13-21 shows the expected number of shuttle buses and car / light van movements associated with the 622 workers expected across the Lime Down Solar Park sites. The assumed 50% mode share taken by the shuttle buses is considered too high to be seen as a worst-case scenario assessment, as made clear in the council's comments at CTMP/TA Scoping stage despite this being accepted on other Solar Farm projects. It is also noted from the table that, of the remaining workers (302),	Please refer to TT2.11 in the Applicant's Response to the Examining Authority's Second Written Questions [REP5-097] .

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			98 are assumed to be car sharing (32%). As such, the single-occupant car trips are only assumed to comprise an 18% mode share which does seem low.	
WC-033	Transport and Access	Construction Worker Traffic Routes	• Table 13-23 shows the magnitude of the daily construction traffic movements expected along various routes. As noted in the past, whilst the HGVs will be forced to use the prescribed construction routes to the Lime Down Solar Park areas, it seems improbable that light vehicle trips associated with workers will be similarly channelled to just these routes. A wider distribution would be expected and more plausible.	The Applicant distributed worker trips to the construction routes as a worst case assessment.
WC-034	Transport and Access	Site Access	4.3. The council welcomes the positive movement towards a commitment to managing new and existing site accesses along the Cable Route Corridor in paragraphs 13.10.65 and 13.10.66 once the scheme is complete.	The Applicant notes this comment.
WC-035	Transport and Access	Bincombe Wood Access Track	5. 6.2 ES Volume 2, Figure 3-4-5.1 and 3-4-5.2 (4 of 4) [REP4-016] 5.1. The Applicant's Deadline 4 Cover Letter [REP4-001] states that the figures have been updated to reflect amendments to the Bincombe Wood access	The Applicant notes this comment.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
	Arboriculture		track. It is noted that a new proposed access track routed to the north of and away from North Bincombe Wood as discussed with the Applicant's environmental, ecological and arboricultural consultants in a meeting on 27th July 2026, is illustrated on the updated figure. The council welcomes the new proposal to create an alternative access track in order to avoid using the existing access track alongside the ancient woodland.	
WC-036	Transport and Access Arboriculture	Bincombe Wood Access Track	5.2. Nonetheless, it is noted that the existing access track alongside North Bincombe Wood is demarcated as a proposed access track on REP4-016. This is a concern for the council as it appears to indicate that the Applicant does still intend to use this access track during construction and presumably also during operation despite proposing the creation of a new access track to be used instead of the existing access track next to the woodland. The resultant lack of clarity due to the provision of inconsistent information gives rise to a lack of certainty and assurance that the request of the council, namely for the existing access track not to be used except for hedgerow / vegetation	The Applicant has provided further information at Deadline 5 in response to WC-070 of the Applicant's Response to Submissions Received at Deadline 4 [REP5-098] . Furthermore, additional wording has been provided within the Outline CEMP [EN010168/APP/7.12] (Revision 7), Outline OEMP [EN010168/APP/7.13] (Revision 6), and Outline DS [EN010168/APP/7.14] (Revision 5), at Deadline 6 to confirm minimal usage of the track for specified purposes and that repairs will be limited to pothole repairs.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			maintenance, will be fulfilled. Furthermore, there are discrepancies in respect of the proposals in terms of usage of the existing access track next to North Bincombe Wood in REP4-011 as detailed above. 5.3. It is therefore requested and expected that the Applicant will provide further information to rectify and clarify the current inconsistencies observed across the recently updated documents and plans.	
WC-037	Transport and Access	Abnormal Load Routes	6. 6.2 ES Volume 2, Figure 13-5 Abnormal Load Routes – Solar PV Sites [REP4-017] 6.1. The council's Highways Development Management officer has no specific comments on this document. It is accepted that the purple route is needed to access Lime Down D (East) and Lime Down E because of the height constraints imposed by the railway bridge over the A429.	The Applicant notes this comment.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
WC-038	Ecology and Biodiversity	Ecological Baseline Report	7. 6.3 ES Volume 3, Appendix 9-1 Ecological Baseline Report (Rev 2) [REP4-020] 7.1. The Schedule of Changes at the front of Appendix 9-1 Ecological Baseline Report (Rev 2) [REP4-020] details that: • Paragraphs 2.3.7 to 2.3.10 have been amended to include methodology for hedgerow surveys and that the updates are in response to Wiltshire Council comments. • Paragraphs 2.4.1 and Table 9-1-1 have been amended to confirm hedgerow survey personnel and that the updates are in response to Wiltshire Council comments.	The Applicant notes this comment.
WC-039	Ecology and Biodiversity	Ecological Baseline Report	7.2. The amendments have been reviewed and the provision of full details of the hedgerow survey methodology employed and for determining whether hedgerows qualified as "important" under the Hedgerow Regulations 1997 is welcomed. Paragraph 2.3.7 states: "The surveys were completed at the same time as the UKHab Survey undertaken at the Solar PV Sites and Cable Route Corridor. The	The Applicant notes this comment.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			method follows Defra hedgerow survey guidance."	
WC-040	Ecology and Biodiversity	Ecological Baseline Report	7.3. However, despite the inclusion of the hedgerow survey methodology, within the latest iteration of within Appendix 9-1, the associated results and details of the hedgerows which have been identified as "important" and / or any associated detailed discussion in terms of evaluation and assessment of impacts upon those hedgerows is still omitted and is also omitted from the revised Chapter 9 Ecology and Biodiversity [REP4-011]. Instead, and as noted in the council's comments on REP4-011, it appears that the results of the hedgerow survey are not actually presented, discussed or assessed anywhere other than on the 2.7 TPO and Hedgerow Plan.	The Applicant notes this comment and has provided a response on this matter to WC-015 and WC-016 of Wiltshire Council's Comments on any Submissions Received at Deadline 4 [REP5-113] .
WC-040	Ecology and Biodiversity	Ecological Baseline Report	7.4. As such, the council's concern and comments made on this topic in a number of representations to date have not been fully addressed by means of the inclusion of the hedgerow survey methodology alone. Neither the revised ES Chapter 9 [REP4-011] or the revised Appendix 9-1 [REP4-020] include any	The Applicant notes this comment and has provided a response on this matter to WC-015 and WC-016 of Wiltshire Council's Comments on any Submissions Received at Deadline 4 [REP5-113] .

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			amendments to the results, evaluation or assessment of impacts sections of the documents to discuss "important" hedgerows.	
WC-041	Transport and Access	Transport Assessment	8. 6.3 ES Volume 3, Appendix 13-1 Transport Assessment (Rev 4) [REP4-038] 8.1. As noted in the listed Schedule for Change at Deadline 4, most of the main-body changes to the report are minor and the council's Highways Development Management officer offers only brief comment on these as follows: • Table 13-10 detailing the proposed Solar PV access locations now refers to Drawing Nos of each. However, it is not made clear in the main body text, or a table note, where these drawings can be located (so Annex C). • Table 13-11 detailing the Cable Route Corridor access points. The same comment made above about the locations of stated drawings applies (so Annex D). • Table 13-20 now provides a summary description of the proposed improvements in the HIA, so Drawing PL302 (Insets 1-9) 'Alderton Road' and Drawing No PL303 (Insets	The Applicant notes this comment.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			3-9) / Drawing No PL304 (Insets 1-4/8) 'Fosse Way'. All these drawings are included in Annex I. The council's comments on the latest drawings in this Annex are detailed below.	
WC-042	Transport and Access	Transport Assessment	8.2. No changes are advised to Annex E, so the supporting calculations underlying the HGV trip generation during the construction phase, or the swept path analyses for a car / HGV and two HGVs (16.5m articulated) in Annexes J and K. The council's Highways Development Management officer therefore focuses here on the following changes: • Annex H: Removal of Drawings SP11-A, SP13-A, SP14-A, SP16-A, SP20-A, SP21-A, SP25-A, SP28-A and replacement with drawings PL401 to PL408 to show swept-paths and mitigation works required in HIAs for AIL deliveries. • Annex I: Update of HIA drawings. Inclusion of Drawings PL302 - PL304, showing details of proposed road widening. Inclusion of Drawings PL305, PL306 and PL309 showing usable road width on proposed construction routes.	The Applicant notes this comment.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
WC-043	Transport and Access	Transport Assessment	8.3. At the ISH3 Hearing it was noted that base topographical survey drawings for 'all' the minor roads forming the HGV construction routes should be provided, with the actual carriageway width dimensions indicated at intervals. It was suggested by Wiltshire Council that each road should ideally employ a chainage line, with widths indicated at, say, 10m intervals. As 5.5m is the minimum width necessary for 2-way HGV passage, and 4.8m for car / HGV passage (MfS), it was suggested it would be helpful to colour-shade route sections with carriageway widths 5.5m or greater and 4.8-5.5m, with unshaded lengths then indicating lengths with a width of less than 4.8m. It was considered this would provide a better 'at a glance' suitability of the existing routes, which is difficult to pick up from the swept path plots where a lot of underlying base detail is masked.	The Applicant will provide WC with the autocad files of the topographical survey prior to Deadline 6.
WC-044	Transport and Access	Transport Assessment	8.4. Drawings PL305, PL306 and PL309 are now included in Annex I. These show lengths on the rural lanes proposed for HGV construction trafficking where the carriageway width is advised as being either 6.0m or greater (blue box), or 5.5m in width or greater (red	The Applicants survey data was undertaken by experienced independent survey companies, using the most up-to-date and sophisticated Trimble Robotic surveying equipment, GPS Glonass receivers and Faro 3D scanners along with the latest data collection technologies

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			box), with distances indicated. It is accepted that this is an alternative means of displaying similar information, and expressly the lengths where the carriageway is 5.5m in width or greater and the relative spacing of these route sections. The council would, however, make the point that all Wiltshire Highway comments below are based on the explicit assumption that the Applicant's assessment of these existing carriageway widths is fully accurate. Wiltshire Council has not undertaken its own detailed carriageway width measurements along the narrow rural lanes in question or instructed any independent survey to be done as a means of verifying the Applicant's assessment. However, the council is aware that the transport consultants acting for Stop Lime Down have been undertaking their own measurements, so the council will expect these measurements to align.	available. The survey is carried out in accordance with BSENISO9001:2000. Unless the SLD survey has been undertaken with this level of accuracy, it is unlikely the measurements will match.
WC-045	Transport and Access	Transport Assessment	8.5. However, one further general question the council does have concerning Drawing PL306 (Alderton Road / Fosse Way) is whether these are all existing carriageway widths, or whether what is shown on the plan assumes the	The applicant will provide the autocad topographical survey file prior to Deadline 6.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			inclusion of the proposed passing space improvements in Drawings PL302-304. This needs clarification. If, as assumed, it does include proposed improvements, it would perhaps have been useful to see the same assessment based on the existing carriageway widths, which would then show the degree of improvement which the HIA changes achieve.	
WC-046	Transport and Access	Transport Assessment	8.6. Drawing PL305 shows the existing carriageway width analysis for the Lime Down D access route between Dyson Roundabout and Bradfield Cottages. The drawing clearly illustrates the narrow section between The Street junction and the sharp bend to the north-west, where any pedestrians walking in the carriageway have no opportunity to step clear due to the banked verges. However, it is accepted that mitigating this by widening will be impractical. However, beyond this bend, the next available passing place for two HGVs is not reached until the railway bridge, so it is considered the flat lengths of verge between will be at risk of regular over-run damage with regular HGV trafficking. To the north of the	Whilst the Applicant has shown that passing places and intervisibility exists on this route and maintains no further widening is required. Should there be any locations where Wiltshire Council and the Applicant agree that road widening is required outside of the Order Limits, this can be delivered via a suitable highway agreement.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			Flying Monk café access, the extremely limited opportunities for passing two large vehicles is very evident. As such, previous views about the need for some widening mitigation to these parts of the routes are re-iterated.	
WC-047	Transport and Access	Transport Assessment	8.7. Drawing PL309 still appears to show that a large part of the route analysis for the road between Fosse Way and the Lime Down A access points is still based on an OS-Landline base and not a full topographical survey of the whole length. It has been repeatedly requested by Wiltshire Council that all existing width assessments should be based on a topographical survey 'base'. It is also noted that concerns about the carriageway width available between the 'Y' junction and the access to the Ladywood Stud were raised by both the Examining Authority and SLD at Hearing ISH3.	A revision of PL309 has been submitted at Deadline 6 [EN010168/APP/6.3] (Revision 6) which includes full topographical survey information.
WC-048	Transport and Access	Transport Assessment	8.8. Drawing PL302 shows the passing place proposals along Alderton Road. The Overview plan shows nine proposed locations for localised carriageway widening, with dimensioned details now shown in Insets 1-9. All these inset details show a passage length of	The Applicant notes this request from the highway authority for carriageway widening to be permanent. The Applicant's view is that the widening is only required for the construction, replacement and the decommissioning phase,

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			circa 20m or greater and width throughout of 6.0m or more. This is considered adequate to pass two 16.5m articulated HGVs in all cases, although at detailed design stage the undertaker would be asked to confirm this with a swept path analysis through each location as part of the suite of drawings for technical approval. Details of the construction make-up and 'tie-in' to the existing carriageway in these locations is not considered necessary at DCO approval stage. What is proposed will depend to some extent on whether the widening works are deemed to be permanent or temporary. Given that HGV trafficking along Alderton Road will continue during the operational phase after the construction phase is completed, it is the council's Highways Development Management officer's opinion that retaining these passing places as permanent works would be preferable. This will enhance future network resilience by improving 2-way passage opportunity for all large vehicles using this road. Returning to the previous query about Drawing PL306, the nine locations between Grittleton and the Fosse Way junction	as they are 30 years apart the widening only needs to be temporary

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			shown as having a carriageway width of >5.5m show a precise match with the Overview plan on Drawing PL302.	
WC-049	Transport and Access	Transport Assessment	8.9. Drawing PL303 shows what are now assumed to be new passing place improvement works along the southern length of the Fosse Way. The nine locations shown in Insets 1-9 again seem to align with most of the locations advised as having a carriageway width of >5.5m on Drawing PL306, suggesting that at present most of the Fosse Way has a width under 5.5m, so insufficient to allow the passage of two large vehicles without the verge being regularly overrun. Proposed passing locations shown on Insets 3-6 seem quite close together when looking at the Overview plan, although the drawing does not indicate the relative spacing between these passing points. However, it is noted that Inset locations 4 and 6 are effectively at the proposed access points to Lime Down Area C, so localised widening to achieve a 6.0m carriageway width at these access points may not be necessary if the sight-line spacings between Inset locations 3-5-7 are acceptable. The dimensional details	The Applicant maintains that the proposed spacing and placement of passing places along the southern length of the Fosse Way are technically robust and safe. Because the Fosse Way is an exceptionally straight and relatively flat alignment, it provides forward visibility that allows opposing drivers to easily observe oncoming vehicles at significant distances and safely coordinate passing manoeuvres well in advance. To demonstrate this, the Applicant has prepared Drawing PL301 in Annex K of ES Volume 3, Appendix 13-1: Transport Assessment [REP5-061], which confirms continuous vertical and horizontal intervisibility along the section north of Fosse Lodge, including the spacing between Inset 2 and Inset 3. The Applicant considers that constructing additional physical passing places along this corridor is unnecessary and would represent over-engineering. However, should it be agreed

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			shown for Inset locations 3 and 5 are acceptable, whilst the passing location indicated in Inset 7 just south of the railway bridge is noted as existing. To the north of the railway bridge the widening details shown in Inset 9 are acceptable in length, whilst it is indicated that the proposed AIL access just north of the bridge (Inset 8) will provide another suitable passage point for two articulated HGVs. One concern which remains is the section to the immediate north-east of the Fosse Lodge junction, where it was previously noted in reviewing the HGV swept path analysis in Annex K that "passing place spacing for 2-way HGV passage exceeding 300m is not accepted, with this shown to be the case immediately north of the Fosse Lodge junction". The spacing between the junction (Inset 2) and the passing point proposed at Inset 3 still seems quite lengthy.	with Wiltshire Council during construction activity that further passing places are required along the Fosse Way public highway, these could be technically designed and delivered using the powers under Article 10 of the DCO post-consent which Wiltshire Council would be required to approve.
WC-050	Transport and Access	Transport Assessment	8.10. Drawing PL304 now shows the proposed passing place improvements along the northern part of Fosse Way. The dimensional details of the proposed passing space works shown in Insets 1, 4 and 5 all appear acceptable,	The Applicant has extended inset 3 in PL304 B in Annex I of ES Volume 3, Appendix 13-1: Transport Assessment [REP4-037] and

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			although the available passing length of circa 15m shown in the Inset 3 location is considered insufficient to accommodate the clear passage of two 16.5m articulated HGVs. It is not clear why the proposed works to the existing field gate access shown in Inset 2 would be necessary given the proximity of the Inset 3 works. Furthermore, the works shown in Inset 5 are shown to be very close to the existing passing bay shown in Inset 6. The existing driveway access shown in Inset 7 is not considered large enough to pass two HGVs, so it is noted a long narrow length of Fosse Way exists between locations shown in Insets 6 and 8. Widening works at the junction between Fosse Way and the road to Sherston are certainly required (Inset 8). Whilst what is shown appears adequate, it needs to be demonstrated with a supporting swept path analysis that an articulated HGV travelling south from Lime Down A and turning right could do so with an opposing HGV waiting at the junction on Fosse Way in a position where the driver is able to see along this road to the first available passing place some 125m to the NW.	Appendix E of the Outline CTMP [REP5-083] to 20m and this is submitted at Deadline 6. Inset 3 includes minor widening and creates another passing place so has been left in. Insets 5 and 6 essentially create a longer passing area. Only very minor widening is proposed at 5, with 6 being retained at its existing width. Inset 7 shows a 17.9m length of 6m wide road. Enough to accommodate a 16.5m articulated vehicle. The vehicle drives into it then another vehicle can pass.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
WC-051	Construction and Decommissioning	Cable Route Construction Method Statement	9. 6.3 ES Volume 3, Appendix 3-2 Cable Route Construction Method Statement (Rev 3) [REP4-040] 9.1. The council wishes to highlight that Revision 3 relates to Paragraph 1.2.4 and not Paragraph 3.4.1 as stated, although the council raises no concerns regarding the content of this revision. This is being identified for clarity.	The Applicant notes this comment.
WC-052	Landscape and Visual	Design Principles and Parameters	10. 7.4 Design Principles and Parameters (Rev 4) [REP4-044] 10.1. The council notes and welcomes the update to this document to include a commitment to rounded wooded fence posts, agricultural in appearance in Tables 2-3, 2-5, 2-8 and 2-9, as requested by the council within ISH 2. However, the council notes that the Applicant has not incorporated the requested additional commitment to incorporate kerbs finished flush with adjacent road and verge levels (which sought to avoid use of uncharacteristic raised concrete kerb edges for retained site access points). The council requests that the Applicant incorporates this into the document as previously requested.	This is a point of detail and is dealt with at the detailed design stage. The kerb type for any proposed access point or amended exiting access point are subject to detailed design. The kerb will be in public highway and so the kerb types will need to be in line with WCs adoptable standards. At the detailed design stage, the detailed drawings will need to be approved by WC.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
WC-053	Ecology and Biodiversity	Biodiversity Net Gain Assessment Report	11. 7.8 Biodiversity Net Gain Assessment Report (Rev 4) [REP4-046] and 7.9 Biodiversity Net Gain Assessment Appendix Statutory Biodiversity Metric Calculation (Rev 4) [REP4-048] 11.1. The Applicant's Deadline 4 Cover Letter [REP4-001] specifies that these documents have been updated to reflect amendments to the Bincombe Wood access track. However, the Schedule of Changes at the front of 7.8 Biodiversity Net Gain Assessment Report [REP4-046] lists a number of additional changes that relate to Change 1 and Change 4 of the Change Application and to correct errors and to reflect minor design changes, not all of which seem to pertain to the Bincombe Access track amendments.	The Applicant notes this comment and confirms that amendments to the Biodiversity Net Gain Assessment Report [REP4-045] submitted at Deadline 4 comprise those changes outlined in the Schedule of Changes at the start of the report.
WC-054	Ecology and Biodiversity	Biodiversity Net Gain Assessment Report	11.2. Whilst these amendments are noted, they do not overcome or address all the concerns and issues raised by the council regarding the BNG submissions to date. During the Issue Specific Hearing covering Ecology and Biodiversity matters (ISH3), it was agreed that the SoCG between the Applicant and Wiltshire Council would be used to progress discussion on these matters further. Nonetheless, the	The Applicant notes this comment and will continue to engage in consultation with the Council to progress outstanding concerns relating to ecology and biodiversity, including Biodiversity Net Gain. Any agreed amendments will be presented in updated versions of the relevant documents, including the Biodiversity Net Gain Assessment Report [REP4-045] and the Biodiversity Net Gain Assessment

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			council considers that it will still be necessary for REP4-046 and REP4-048 to be amended accordingly to reflect where matters are progressed to being agreed. The council expects revised documents to be submitted in due course.	Appendix Statutory Biodiversity Metric Calculation [REP4-047] as required.
WC-055	Arboriculture	Outline CEMP	12. 7.12 Outline Construction Environmental Management Plan (Rev 5) [REP4-050] 12.1. The Applicant's Deadline 4 Cover Letter [REP4-001] states that the Outline CEMP has been updated in response to actions from Compulsory Acquisition Hearing 1 and Issue Specific Hearings 2 and 3. 12.2. Under Agenda Item 3.2 of ISH3, the Applicant's Post Hearing Summary [REP4-086] states: <i>"Ms Brodrick confirmed that there is an Arboricultural Clerk of Works and that as part of Table 4, section 3.15 of the Outline Construction Environmental Management Plan [REP3-092] it requires a person of at least 5 years' relevant experience."</i> 12.3. Wiltshire Council Arboricultural Officers have reviewed Table 4 of the Outline Construction Environmental Management Plan	The Applicant acknowledges Wiltshire Council's observation. The reference made during ISH3 to the requirement for the Arboricultural Clerk of Works (ACoW) to have at least five years' relevant experience reflected the Applicant's intended commitment; however, due to an oversight, Table 4 of the Outline CEMP [REP5-071] had not previously been updated to include this requirement. Table 4 of the Outline CEMP [EN010168/APP/7.12] (Revision 7) has now been updated to confirm that the ACoW shall have a minimum of five years' relevant arboricultural experience.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			[REP3-092], and this latest iteration, and cannot identify any requirement specifying a minimum of five years' relevant experience for the Arboricultural Clerk of Works. 12.4. This statement therefore appears inconsistent with the document referenced.	
WC-056	Arboriculture	Outline CEMP	12.5. Furthermore, the requirement for an "appropriate qualification" and reference to BS 3998:2010 alone does not provide sufficient assurance that the appointed Arboricultural Clerk of Works possesses the level of practical experience necessary to oversee and advise on works of this scale and sensitivity, particularly where ancient woodland, retained trees and complex tree protection measures are involved.	The Applicant has considered Wiltshire Council's comments and has updated Table 4 of the Outline CEMP [EN010168/APP/7.12] (Revision 7) to provide further clarity regarding the required qualifications, experience and competence of the ACoW. The revised wording confirms that the ACoW shall be a suitably qualified and experienced arboriculturist with a minimum of five years' relevant professional experience, together with appropriate knowledge and practical experience of arboricultural matters relating to construction. This specifically includes the application of BS 5837:2012 (or any relevant successor standard), tree protection measures and the supervision of works within or adjacent to Root Protection Areas. The ACoW is also required to have sufficient experience and

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				competence to undertake the duties identified within the Arboricultural Method Statement and to provide appropriate arboricultural advice to the construction team throughout the works. The Applicant considers that these additional provisions provide appropriate assurance that the appointed ACoW will possess the necessary professional and practical experience to oversee the arboricultural aspects of the construction works, including works associated with retained trees, ancient woodland and tree protection measures.
WC-057	Arboriculture	Outline CEMP	12.6. Wiltshire Council Arboricultural Officers therefore request that the Applicant: • Identifies where the stated five-year minimum experience requirement is secured within the application documents; • Provides details of the minimum qualifications and experience requirements for the ACoW role; and • Secures an appropriately qualified and demonstrably experienced Arboricultural Clerk	The Applicant notes this comment and refers to its response under WC-056.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			of Works through the relevant management plans and commitments. 12.7. This is necessary to ensure that arboricultural supervision is undertaken by an individual with sufficient competence and experience to identify risks, advise contractors, and safeguard retained trees and ancient woodland throughout construction and operation.	
WC-058	Description and DCO Process	Examining Authority's Second Written Questions	12.8. In order to avoid duplication, comments on REP4-050 are also provided in response to DCO2.1 posed in the Examining Authority's second written questions and requests for information (ExQ2) [PD-014], which have been responded to in a separate submission.	The Applicant notes this comment.
WC-059	Arboriculture Transport and Access	Bincombe Wood Access Tracks	13. 7.13 Outline Operational Environmental Management Plan (Rev 5) [REP4-052] 13.1. The Applicant's Deadline 4 Cover Letter [REP4-001] states that the Outline OEMP has been updated in response to actions from Issue Specific Hearings 3 and 4. 13.2. The oOEMP states: "Should the existing track adjacent to Bincombe Wood be used	The Applicant has considered Wiltshire Council's comments and has updated the Outline CEMP [EN010168/APP/7.12] (Revision 7), Outline OEMP [EN010168/APP/7.13] (Revision 6) and Outline Decommissioning Strategy [EN010168/APP/7.14] (Revision 5) to provide further clarity regarding the use and maintenance of the existing access track

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			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 an upgrade is 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. Use of the track will be limited to light vehicles for occasional maintenance." 13.3. Wiltshire Council Arboricultural Officers question the need for an operational maintenance track within the 15 m buffer of Bincombe Wood Ancient Woodland. 13.4. The scheme already includes the proposed AIL access route, which appears capable of accommodating maintenance vehicles throughout the operational life of the development. The Applicant should therefore justify why a separate access track is required within the ancient woodland buffer	adjacent to North Bincombe Wood Ancient Woodland. The updated documents now confirm that: "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. Use of the access track shall be limited to access by existing landowners for the purposes of accessing and managing their land; access required for hedgerow and other vegetation management; and access by the undertaker, its contractors or agents where reasonably necessary to undertake activities required to comply with, or discharge, its legal or statutory obligations in connection with the authorised development." The Applicant therefore confirms that the track is not proposed as a routine operational maintenance access route for the authorised development, nor is it proposed to be upgraded to provide such a route. The limited provision for continued use of the existing track is retained to allow existing

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			zone rather than utilising the existing proposed access infrastructure. 13.5. Whilst the Applicant has indicated that the track would be used for hedgerow / vegetation maintenance, the hedgerow located along the track side of the buffer zone does not appear to require any additional management beyond that currently undertaken by existing landowners or users. As such, no clear arboricultural or land management justification has been provided for the Applicant requiring routine access within the buffer zone. 13.6. Given the sensitivity of the location adjacent to ancient woodland, the need for the track should be clearly demonstrated and alternatives outside the buffer zone fully explored.	landowners to continue to access and manage their land, to facilitate necessary hedgerow and vegetation management, and to ensure that access remains available to the Undertaker where reasonably necessary to fulfil any legal or statutory obligations associated with the authorised development. Any repairs would be strictly limited to the infilling of potholes using no-fines gravel and topsoil, thereby avoiding more substantive works to the track within the ancient woodland buffer.
WC-060	Description and DCO Process	Examining Authority's Second Written Questions	13.7. In order to avoid duplication, comments on REP4-052 are also provided in response to DCO2.1 posed in the Examining Authority's second written questions and requests for information (ExQ2) [PD-014], which have been responded to in a separate submission.	The Applicant notes this comment.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
WC-061	Soils and Agriculture	Outline Soil Resources Management Plan	14. 7.15 Outline Soil Resources Management Plan (Rev 3) [REP4-054] 14.1. Within 9.49 Written Summary of the Applicant's Oral Submissions and Responses at Issue Specific Hearing 2 and Responses to Action Points [REP4-085], and specifically in the response to Action Point 1 Annex A, the council notes the Applicant's confirmation that 24.1 Hectares of existing agricultural land is proposed to be surfaced with hard surfacing materials to create new access tracks and compounds etc. 14.2. The council estimates that excavation to 300mm depths covering 24.1 hectares of new hard surfacing would result in a requirement for circa 72,300 m3 of necessary topsoil storage requiring circa 4.47 hectares of land for this purpose, which equates to 3.42 km of linear soil storage bunds 13m wide x 3m high.	The Applicant notes this comment.
WC-062	Soils and Agriculture	Outline Soil Resources Management Plan	14.3. The council notes the amendments to 7.15 Outline Soils Resources Management Plan (oSRMP) (Rev 3) [REP4-054], including additional principles for locating soil stockpiles (paragraph 1.8.22) and the	The Outline SRMP [EN0101/APP/7.15] (Revision 5) has been updated for Deadline 6 to incorporate spatial constraints and exclusions in relation to the siting of stockpiles.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
		Management Plan	introduction of maximum stockpile parameters (paragraph 1.8.24). However, significant concerns remain regarding the scale of soil storage proposed, the absence of identified stockpile locations, and the lack of clarity regarding the management and disposal of hardstanding spoil generated during decommissioning.	The anticipated Scheme decommissioning waste streams are provided in Table 20-8 of Environmental Statement Volume 1 Chapter 20 Other Environmental Matters [REP5-028] where is stated that concrete and aggregates are recyclable/recoverable. The Outline Decommissioning Strategy [REP5-075] submitted with the DCO Application sets out the commitment of the Applicant to maximise reuse and recycling of Scheme components at the end of their life. The Outline DS [REP5-075] states that a detailed Site Waste Management Plan will be prepared before commencement of decommissioning and will be implemented by the contractor, once appointed. All waste transported off site will be delivered to the appropriately licenced receivers of such materials. As part of the SWMP, the contractor would segregate decommissioning waste to be re-use and recycled where reasonably practicable.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
WC-063	Soils and Agriculture	Soil Stockpile Volumes	Stockpile Volumes 14.4. The Applicant confirms within their response to ISH2 Action Point 1 in Annex A [REP4-085] that approximately 24.1ha of existing agricultural land will be hard surfaced for access tracks, compounds and associated infrastructure. Assuming average 300mm excavation depths, the council estimates this would generate an on-site topsoil storage requirement of circa 72,300 m³ which could equate to a footprint of approximately 4.47 ha based on the stockpile dimensions included within paragraph 1.8.24 of the oSRMP (Rev 3) [REP4-054]. 14.5. The scale of storage required is substantial and reinforces the need for clearly identified and demonstrably suitable stockpile locations.	The Applicant notes this comment.
WC-064	Soils and Agriculture	Soil Stockpile Locations	Stockpile Locations 14.6. Wiltshire Council remains concerned that no indicative stockpile locations have been identified within the latest revision of the oSRMP [REP4-054] or on any supporting	The Applicant's refers to its response to DCO2.1ah regarding spatial constraints and exclusions when siting stockpiles.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			plans. While paragraph 1.8.22 references good practice measures such as avoiding impacts on trees and construction activities, it does not adequately address other key environmental constraints, embedded mitigation areas, ecological buffers or consider landscape character or visual amenity.	
WC-065	Soils and Agriculture Hydrology, Flood Risk and Drainage	Soil Stockpile Locations	14.7. The council notes that 6.1 ES Vol 1, Chapter 11 Hydrology, Flood Risk and Drainage (Rev 4) [REP4-013] identifies preservation of overland flow paths as a key design principle and states that no bunding is proposed within such areas. 22 However, the Applicant has not identified these flow routes or demonstrated how proposed stockpile areas would avoid them.	The Applicant notes this concern regarding the relationship between soil stockpile locations and identified overland flow routes. This matter has moved on since ES Chapter 11: Hydrology, Flood Risk and Drainage [REP4-013]. In response to FHW2.1, the Applicant has updated ES Volume 2, Figures 11-1 to 11-7: Fluvial and Surface Water Flood Risk Maps [REP5-030 to REP5-036] to show the existing drainage features, watercourses, ditches and overland flow routes in relation to the indicative Scheme infrastructure. The precise locations of topsoil and subsoil stockpiles are not fixed at this stage because they will depend upon the final construction layout, sequencing and soil-handling requirements. Their locations will be determined

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				through the detailed Soil Resources Management Plan, in accordance with the principles established by the Outline SRMP [REP5-077]. The construction water-management framework separately requires existing drainage features and overland flow routes to be identified and maintained, and requires the interaction of temporary works, including stockpiles, with those routes to be addressed through the detailed CEMP and Water Management Plan. The siting of stockpiles will therefore be informed by the identified flow routes so that they do not materially obstruct or divert existing surface water flows or increase flood risk elsewhere. The wider construction-phase water-management and assurance arrangements are addressed comprehensively in the Applicant's response to DCO2.1y above and are not repeated here. The Applicant therefore considers that it is neither necessary nor appropriate to fix individual stockpile locations at the outline design stage. The relevant hydrological

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				constraints are now identified, and the secured detailed CEMP, Water Management Plan and SRMP provide the appropriate mechanism for locating and managing stockpiles having regard to those constraints.
WC-066	Soils and Agriculture	Soil Stockpile Locations	14.8. Given the potential extent of soil stockpiles, the council considers that indicative stockpile locations should be identified on the Works Plans, or alternatively that clear spatial constraints and exclusion areas should be incorporated within any relevant mitigation strategies.	The Applicant refers to its response to DCO2.1ah regarding spatial constraints and exclusions when siting stockpiles.
WC-067	Soils and Agriculture Construction and Decommissioning	Soil Resource Retention and Agricultural Restoration	Soil Resource Retention and Agricultural Restoration 14.9. The council considers it important to demonstrate that sufficient soil resources will remain available to facilitate agricultural restoration following decommissioning. At present, it remains unclear how soils will be safeguarded over the lifetime of the development, including whether significant quantities may ultimately be disposed of, sold,	All topsoil resources will be retained in stockpiles on-site and available for reuse. Subsoils may be stockpiled or potentially distributed across mitigation areas to support the establishment of low-nutrient habitat. Soil stockpiles and bunds will be distributed across the Solar PV Sites, including land adjacent to the 132 and 400kV substations. The Outline Decommissioning Strategy [REP5-075] makes provisions for using

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			or incorporated into permanent landscape features.	appropriate imported soil in restoration if required.
WC-068	Soils and Agriculture Construction and Decommissioning	Soil Resource Retention and Agricultural Restoration	14.10. This uncertainty raises concerns regarding the reversibility of the development and the assumptions that underpin the Environmental Impact Assessment. Furthermore, the Environmental Statement does not appear to consider the implications of importing replacement soils should adequate on-site soil resources no longer be available at decommissioning.	The Applicant refers to its response under WC-067. It is anticipated that sufficient soil resource will be retained on-site to complete restoration works. The possibility of importing material is not definite and has therefore not been assessed as there are no means by which to determine need, quantities and source at this time.
WC-069	Soils and Agriculture	Long-Term Soil Health	Long-Term Soil Health 14.11. The council also remains concerned regarding the long-term condition of soils proposed to be stored within stockpiles of up to 3m in height for potentially 60 years. While paragraph 1.8.24 of the oSRMP (Rev 3) [REP4-054] establishes maximum stockpile dimensions, the Applicant has not demonstrated how soil structure, biological function and agricultural quality will be maintained over such extended timeframes.	The Applicant is not aware of any precedent for construction stockpiles having been in place for 60 years to use as a case study. The Applicant acknowledges that excavating soils will disrupt the structure however, stockpiling soils when in an appropriately dry and friable condition will preserve some soil structures and seeding with an appropriate grass or flower mix will enable roots to penetrate through the soil store and maintain a degree of aeration, biological function and nutrient cycling. The stockpiles will not be subject to disturbance subsequent to their construction and it is not anticipated that

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			14.12. The council notes that best-practice guidance generally limits the duration of topsoil storage in high stockpiles to significantly shorter periods. Consequently, the council does not consider that sufficient evidence has been provided to demonstrate that soils can be retained in a condition suitable for successful agricultural restoration following decommissioning.	the physical condition will deteriorate. The Outline SRMP [REP5-077] notes that on decommissioning and soil reinstatement, the stockpiled soils will be subject to nutrient testing to identify any deficits that may require amendment.
WC-070	Soils and Agriculture	Soil Resource Retention	14.13. The council's primary concerns are that the Applicant has not yet demonstrated: • where the significant volumes of topsoil and subsoil would be stored;	Excavated soils will be distributed around the Solar PV Sites, primarily in soil stockpiles and bunds. Potential locations include land adjacent to the 132 and 400kV substations. There is a possibility for some excavated soil to be spread across mitigation areas to support establishment of low-nutrient habitat.
WC-071	Soils and Agriculture	Soil Resource Retention	• that stockpile locations can be accommodated without conflict with environmental constraints and numerous other design mitigation measures;	The Applicant notes this comment and refers to the response provided under WC-075.
WC-072	Soils and Agriculture	Long-Term Soil Health	• that soil quality can be maintained over the proposed 60-year storage period;	The Applicant notes this comment and refers to the response provided under WC-069.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
WC-073	Soils and Agriculture	Agricultural Restoration	• and that sufficient soil resources will remain available to achieve successful agricultural restoration at decommissioning.	The Applicant notes this comment and refers to the response provided under WC-068.
WC-074	Soils and Agriculture	Outline Soil Resource Management Plan	14.14. Accordingly, further spatially specific information and supporting evidence are required before the council's concerns can be satisfactorily addressed.	The Applicant notes this comment.
WC-075	Soils and Agriculture	Outline Soil Resource Management Plan	14.15. The council considers that all relevant environmental constraints likely to impact locational areas for soil stockpiles should be identified as locational restriction criteria and additionally listed under paragraph 1.8.22 of the oSRMP [REP4-054], as it is not just potential conflict with trees or other construction activities that should inform acceptable locations for soil stockpiles.	The Outline SRMP [EN010168/APP/7.15] (Revision 5) has been updated to incorporate further details on spatial and environmental constraints.
WC-076	Description and	Examining Authority's Second	14.16. In order to avoid duplication, comments on REP4-054 are also provided in response to DCO2.1 posed in the Examining Authority's	The Applicant notes this comment.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
	DCO Process	Written Questions	second written questions and requests for information (ExQ2) [PD-014], which have been responded to in a separate submission.	
WC-077	Description and DCO Process	Examining Authority's Second Written Questions	15. 7.19 Outline Ecological Protection and Mitigation Strategy (Rev 4) [REP4-056] 15.1. The Applicant's Deadline 4 Cover Letter [REP4-001] states that the Outline EPMS has been updated to reflect amendments to the Bincombe Wood access track.	The Applicant notes Wiltshire Council's comment.
WC-078	Description and DCO Process	Examining Authority's Second Written Questions	15.2. In order to avoid duplication, comments on REP4-056 are provided in response to DCO2.1 posed in the Examining Authority's second written questions and requests for information (ExQ2) [PD-014], which have been responded to in a separate submission.	The Applicant notes this comment.
WC-079	Transport and Access	Outline CTMP	16. 7.22 Outline Construction Traffic Management Plan (Rev 4) [REP4-058] 16.1. The council welcomes the amendments to the AIL movements routes. 16.2. As noted in the listed Schedule for Changes at Deadline 4, most of the main-body changes to the oCTMP within Revision 4 are minor and only serve to align the information	Tables 13-10 and 13-11 must necessarily be updated within the Outline CTMP [REP5-084] to be consistent with the updated figures within the Transport Assessment. The Outline CTMP [REP5-084] was also updated at Deadline 5, and the Schedule of Changes records the nature and reasons for the further updates.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			with changes made to the Transport Assessment. So, for example, the changes to Tables 2 and 3 detailing the Lime Down PV and Cable Route Corridor accesses just replicate the changes in Tables 13-10 and 13-11 within the Transport Assessment for consistency.	
WC-080	Transport and Access	Detailed Design of Permanent Highway Works	Sub-Section 2.3: Detailed Design 16.3. Previous council comments still apply in respect of paragraph 2.3.1. The detailed design of permanent highway works is not considered to be an oCTMP 'requirement' matter. The Local Highway Authority Protective Provisions now included in Part 11 to Schedule 15 to the DCO will cover these requirements and more, such as Bond sums, inspections, indemnity provision and certification (once agreed). It is suggested this paragraph should refer to the LHA Protective Provisions, even if continuing to provide a broad summary listing of the 'key' documentation required.	The Applicant has received Wiltshire Council's most recent comments on the draft protective provisions for the benefit of the local highway authority on 11 August 2026. The Applicant is anticipating that it will be in a position to respond to Wiltshire Council's comments shortly after Deadline 6.
WC-081	Transport and Access	Construction Vehicle Trip	Section 3: Construction Vehicle Trip Generation	A meeting with WC was undertaken on 19/08/26 to discuss the trip generation, and recent agreements and meeting with SLD undertaken on 06/08/26. At the time of writing,

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
		Generation	16.4. As noted in the council's comments on ES Volume 1, Chapter 13 Transport and Access (Rev 4) [REP4-015] above, matters relating to the number of expected HGV deliveries (Table 4) and the mode split associated with construction worker trips (Table 5) are still not agreed.	the meeting notes have been issued to WC and the Applicant is waiting for a response, however, it was concluded that the trip generation numbers are broadly agreed with both SLD and WC.
WC-082	Transport and Access	Road Condition Surveys	Section 6.12: Road Condition Surveys 16.5.To re-iterate, it remains the council's preference that that all matters relating to the Highway Condition surveys are included in a separate s59 Agreement, as opposed to be subsumed into the oCTMP or a later CTMP. It is stated in paragraph 6.12.2 that "The extent of the survey will be agreed with the local highway authority prior to commencement and as part of the Final CTMPs". However, it is unclear as to why this cannot be determined now as all the roads likely to be impacted by extraordinary HGV trafficking are known and so a plan included within a s59 Agreement. It is the council's view, as stated before, that the Lime Down Solar Park HGV construction trafficking along the narrow rural lanes will be	The Applicant refers to its response given to 4.3, which addressed the adequacy of opportunities for two HGV to pass. In addition, the Outline CTMP [REP5-083] set out the requirement to undertake pre-construction, interim and post-construction road condition surveys. The full scope of the areas included will be agreed as part of the Final CTMP which must be substantially in accordance with the Outline CTMP [REP5-083] which will be secured through Requirement 15 of Schedule 2 to the Draft DCO [REP5-012].

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			'Extraordinary' in the context of the definition set out in s59 of the Highways Act. There is thus a concern with the use of the revised wording in paragraph 6.12.1 which states: "Any identified highways defects or carriageway structural failures resulting from construction activities associated with the Site will be corrected to the satisfaction of the local highway authority either on the completion of the Construction Phase or, if required for safety reasons, prior to or during the Construction Phase. The Highway Authority will be allowed to recover any additional costs incurred, over and above its existing responsibility to maintain, in a steady state, the road(s) in question". This leaves a lot of potential for arguments about remediation noting the last sentence, unless this is accepted by the Applicant that construction trafficking on the rural lanes associated with LDSP is deemed extraordinary. In the absence of the LDSP development and given the existing level / type of trafficking along these lanes, any routine maintenance the council might be required to undertake would reasonably be expected to be small in	

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			scale and outlay. However, the level and duration of HGV trafficking over the LDSP construction period will likely lead to an accelerated risk of highway damage to these rural roads and a need for ongoing maintenance which would not otherwise occur. In short, the council's view is that all the identified roads shall be returned to a condition which is at least as good as the pre-construction highway survey state, or better, and that all costs for doing so must be borne by the Applicant. This removes any ambiguity as to what will be expected and liability for remedial costs.	
WC-083	Transport and Access	Road Condition Surveys	16.6. It is not considered that simple video surveys of the roads to be included will suffice as suggested in paragraph 6.12.1. Plans showing each road length to be included will be needed, with a chainage shown and the location of all photographs taken indicated. The latter should include the location of all existing defects found in the pre-construction condition survey. A separate Schedule would additionally be desirable describing the defects with some indication of severity. This may be useful	The Applicant notes this comment and agrees. Paragraph 6.12.1 of the Outline CTMP [REP5-083] states the routes will be agreed in the detailed CTMP and it is assumed the survey method will also be agreed at this stage.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			to agree on any pre-emptive highway works, which may be needed to prevent early deterioration caused by regular HGV trafficking.	
WC-084	Description and DCO Process	Examining Authority's Second Written Questions	16.7. In order to avoid duplication, comments on REP4-058 are also provided in response to DCO2.1 posed in the Examining Authority's second written questions and requests for information (ExQ2) [PD-014], which have been responded to in a separate submission.	The Applicant notes this comment.
WC-085	Description and DCO Process	Statement of Common Ground	17. 8.1 Statement of Commonality (Rev 5) [REP4-060] 17.1. Wiltshire Council and the Applicant have held a number of topic specific meetings recently to review the Statement of Common Ground and discuss outstanding concerns, including consideration of the best way forward for those items where considerable differences in the respective positions remain. Discussions have recently been held for the following technical disciplines: archaeology, flood risk and drainage, ecology and biodiversity, soils	The Applicant is continuing its discussions with Wiltshire Council on the Statement of Common Ground. A revised Statement of Common Ground with Wiltshire Council [EN010168/EXAM/8.2] (Revision 4) will be submitted at Deadline 6. Progress with all Statement of Common Ground parties will continue to be documented through the Statement of Commonality [EN010168/EXAM/8.1] (Revision 7), which has been updated and submitted at Deadline 6.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			and agriculture, built heritage, economy, public health, landscape and visual, and arboriculture. 17.2. As part of these discussions, the council and the Applicant are also looking to streamline the SoCG so that the issues and their current status are clearly identified and articulated. 17.3. Further detailed discussions are currently ongoing between parties in order to progress the Statement of Common Ground with Wiltshire Council. Whilst the update to the SoCG submitted at Deadline 5 contains revisions for some technical areas, some technical areas remain unchanged from the previous version, for example with regards to landscape and visual matters, transport and access and ecology and biodiversity. However, it is agreed that the parties will work positively together to provide an updated Statement of Common Ground for all technical disciplines at Deadline 6 and follow-up discussions have been or are in the process of being scheduled.	

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
WC-086	Transport and Access	Statement of Common Ground	17.4. With regards to Transport and Access, whilst this matter remains under ongoing discussion with the Applicant, the previous 'key' highway matters reported as 'under discussion' remain the same, being: • Predicted overall HGV trip generation during the construction phase and underlying calculation assumptions. • Passing place mitigation needed to accommodate two opposing HGVs along the narrow rural lanes proposed for construction access, and the location of these highway works. Whilst the latest HIA proposals in Annex I to the Transport Assessment include additional passing space works along Fosse Way, there are remaining queries on the relative spacing on these. Furthermore, there remain no proposals to improve and accommodate HGV passage along the route between Dyson Roundabout and Bradfield Cottages, and expressly the length north-west of the junction with The Street. • The council's desire for a bespoke s59 Highway Agreement to address wider	A meeting with WC regarding trip generation calculations was undertaken on 19/06/26. Once agreed meeting notes will be submitted into the examination, The Applicant is comfortable with its proposed routing and passing places. If WC propose further passing places then that can be discussed. The Outline CTMP [REP5-083] provides for road traffic condition surveys and rectification of any damage caused by construction traffic. The inclusion of key highway links requested by WC have been included in Section 6.12. The Applicant is therefore already bound by Requirement 15 in Schedule 2 to the Draft DCO [REP5-012] to rectify any damage to the highways. Please refer to the Applicant's response to Wiltshire Council in respect of DCO1.15 in the Applicant's Response to Other Parties' Responses to Examining Authority's First Written Questions [REP4-081]. It remains open to the Council to recover any excess expenses that it can demonstrate are a

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			consequential highway damages to the rural lanes being used for HGV construction trafficking, so those parts of the rural highway network not under direct highway works to form the necessary access points to the Solar PV sites or within defined HIA.	consequence of the Scheme under s59 of the Highways Act 1980.
WC-087	Description and DCO Process	Statement of Common Ground	17.5. Both parties understand that a final signed version of the SoCG is required to be submitted at Deadline 7.	The Applicant is continuing its discussions with Wiltshire Council on the Statement of Common Ground. A revised Statement of Common Ground with Wiltshire Council [EN010168/EXAM/8.2] (Revision 4) will be submitted at Deadline 6 and the final version will be submitted at Deadline 7. Progress with all Statement of Common Ground parties will continue to be documented through the Statement of Commonality [EN010168/EXAM/8.1] (Revision 7), which has been updated and submitted at Deadline 6. A final version of which will also be provided at Deadline 7.
WC-088	Socio-Economic, Tourism and	GLVIA Methodology	18. 9.42 Sequential Visual Effect on Wiltshire Cycleway [REP4-078]	The Assessment undertaken does consider the Sequential Cumulative Visual Effect when the

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
	Recreation		18.1. The council raises concern that the methodology used is incomplete and does not fully follow the guidance issued in GLVIA 3. At Table 7.1 page 131 of GLVIA the definition of Sequential Cumulative Visual Effect specifically states: <i>Occurs when the observer has to move to another viewpoint to see the same or different developments.</i> (emphasis added)	observer has to move to another viewpoint to see the same or different developments. The Applicant notes this comment and refers to its response to WC-089.
WC-089	Socio-Economic, Tourism and Recreation	Sequential Visual Effect on Wiltshire Cycleway	18.2. Therefore, the comment at 1.1.4 of 9.42 Sequential Visual Effect on Wiltshire Cycleway [REP4-078] that: Sequential Effects relate to the visual experience of recognised routes and occur when the observer has to move to another location to see different developments, is in fact incorrect and does not take account of different locations from where the same site is visible. This is particularly pertinent where Wiltshire Cycleway Route (WCR) passes through the Lime Down development areas and the same site is visible sequentially. Therefore, as 1.1.4 states that the receptor is moving to see different developments, this misses a key part of the assessment.	Paragraph 1.14 in the Assessment is a general introduction to the scope of the assessment and refers to the general description of cumulative visual effects in bullet 3 of Paragraph 7.3 of GLVIA3. As such this is not considered to be incorrect. It is recognised that GLVIA's definition in Table 7.1 page 131 is more nuanced with the addition of the words 'same or'. However, it is considered that this nuanced difference is implicit in paragraph 7.3. Due to the distances between the Lime Down Scheme and the CD Sites of course the receptor needs to move to see the different developments. This does not preclude the

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				possibility that the same or different developments are not assessed. However, there are no instances where this occurs. The assessment fully considers the sequential effects on the Wiltshire Cycleway as it passes through the Lime Down Scheme - Perhaps the nuanced difference in terminology used is worth stating as Wiltshire Council refers to Lime Down development areas. It is assumed that this is the Lime Down Sites A_E which make up the Scheme and represent the 'same' development. The assessment undertaken robustly considers the sequential effects of the Lime Down Sites where the same development is visible sequentially.
WC-090	Socio-Economic, Tourism and Recreation	Sequential Visual Effect on Wiltshire Cycleway	18.3. Another issue which is of concern is that apart from SVP12, all the SVPs are taken with the receptors moving broadly from north-east to south-west along the Wiltshire Cycleway, with the potential sequential views available to the receptor passing in the opposite direction not having been considered or appropriately expressed in the report.	The Applicant recognises this point, but directs WC to their own website - https://www.wiltshire.gov.uk/article/1231/Wiltshire-Cycleway which states that: <i>"The route has been designed to be cycled in an anti-clockwise direction and can be shortened by using our cross county routes"</i>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				<i>along the Kennet and Avon Canal, through the Vale of Pewsey or down the Wylye Valley."</i> It is the design of the route, to be cycled anti clockwise, that has dictated the approach undertaken within the Assessment.
WC-091	Socio-Economic, Tourism and Recreation	Sequential Visual Effect on Wiltshire Cycleway	18.4. The council considers that relying on the mitigation proposed in the LVIA is not necessarily appropriate for dealing with Cumulative Effects. Paragraphs 7.39 and 7.40 of GLVIA deal with this issue. However, the report does not state what mitigation is actually proposed and how it will be appropriate for mitigating the sequential cumulative effects to the extent shown in Table 3.1. The council does not agree with the assessment that decommissioning will have no effect on sequential cumulative effects. No evidence has been provided that this will be the case, as to all intents and purposes, the effects are likely to be similar to the construction effects.	The Applicant considers there are no significant landscape and visual effects as a result of interaction with the Scheme and other developments. Embedded mitigation proposed in the Lime Down Scheme is appropriate in reducing the long-term (intra) visual effects of the Scheme. It is the Applicant's view that due to the proposed embedded mitigation which would have matured by decommissioning, the strengthened landscape framework would screen views to decommissioning activities within the Scheme, resulting in Neutral or no effects.
WC-092	Socio-Economic, Tourism and	Sequential Visual Effect on	18.5. The council further notes that the assessment does not consider the sequential perceptual visual aspects which can be reasonably anticipated to arise from regularly	The impact of traffic is fully assessed in ES Volume 3 Appendix 13-1 Transport Assessment [REP5-061] . The local roads which make up the Wiltshire Cycleway between

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
	Recreation	Wiltshire Cycleway	encountered and sustained construction traffic movements along these road sections shared with the WCR along Section 14 [REP4-078] (Annex A, Wiltshire Cycleway Section Map 14) between Grittleton Crossroads and Foxley impacting cycleway users' perceptual visual quality and sequential visual experiences during the projects construction, maintenance (replacement) and decommissioning phases.	Foxley and Grittleton are already used by HGVs and are commonplace. The increase of traffic resulting in the occasion additional vehicle movement would not have a notable effect on the perceptual visual quality and sequential visual experiences of users on Section 14 of the Wiltshire Cycleway.
WC-093	Socio-Economic, Tourism and Recreation	Sequential Visual Effect on Wiltshire Cycleway	18.6. The assessment's consideration of this matter is limited to comments at paragraph 3.2.7 [REP4-078] "there will be temporary traffic management measures during construction which would have a short term and adverse effect to users of Wiltshire Cycleway". This commentary relates to the construction of HGV Passing places and AIL road widening works along this shared route length, but does not reflect the high level of increased visual and perceptual disturbance generated by the projects construction traffic, directly sharing relevant sections of the WCR, given that all construction traffic can only use this shared WCR section to construct, maintain and	As noted above, the increase of traffic resulting in the occasion additional vehicle movement would not have a notable effect on the perceptual visual quality and sequential visual experiences of users on Section 14 of the Wiltshire Cycleway.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			decommission all development proposed within Lime Down Areas A, B and C.	
WC-094	Soils and Agriculture	Farming and Food Security Technical Note	19. 9.43 Farming and Food Security Technical Note [REP4-079] 19.1. In Section 3.4 in relation to Self-Sufficiency Context, the Applicant suggests that as the Government is seeking to increase food exports, there is not a food security reason to retain domestically produced food in the UK. The council wishes to highlight that all Governments look to increase exports of a wide variety of goods, and just because a government looks to increase the export of defence goods, it does not mean that it's not concerned about having enough to ensure the defence of the country.	The Applicant considers that movement and trade of goods is a reflection of supply security, need and abundance. The Farming and Food Security Technical Note [REP4-079] sought to address a range of relevant issues whilst keeping the report concise. Exports is just one of a multitude of factors that affect and are affected by food security but was considered one that was important to highlight.
WC-095	Soils and Agriculture	Farming and Food Security Technical Note	19.2. With respect to Sections 4.1.3 to 4.1.30, Wiltshire Council would like to thank the Applicant for the survey they have conducted with individual landowners which appears comprehensive. The council would, however, make the following comments on these sections:	The Applicant is not able to comment on the economic situation of farming in the distant future. In consideration of a hypothetical national imperative to increase food production, the land in the Solar PV Sites is primarily of moderate to poor quality in Subgrade 3b and Grade 4 and is therefore not amongst the most

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			Land that is currently in environmental schemes like ELM, and on the whole is the least productive, could be brought back into food production very quickly should the economics change or there is a national imperative to increase food production. This would not be the case if the land is populated with solar panels.	productive agricultural land and its contribution would be questionable.
WC-096	Soils and Agriculture	Farming and Food Security Technical Note	Due to what has historically been more changeable weather over the summer months, the majority of UK cereal production has been for animal feed. However, with drier, hotter summers experienced in recent years this is beginning to change. Whilst the council notes the sentence 'Loss of the farmable area would have no impact on food production for direct human consumption', the council considers that it would be used for milk, pork, chicken, beef, lamb and egg production in the UK. Therefore, the lost cereal production from this land will have to come from somewhere else.	As indicated in the Applicant's response to WC-092, the factors discussed in the Farming and Food Security Technical Note [REP4-079] are not exhaustive, only a sample of relevant factors affecting domestic food security. The report does not discuss consumer choices. If meat consumption declined, there would be no requirement for replacing cereals grown for animal feed.
WC-097	Soils and Agriculture	Farming and Food Security	The council considers that the conclusion from the responses in section 4.1.31 that the	The conclusions drawn in Section 4.1 are derived directly from the custodians of the land

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
		Technical Note	presence of the scheme is unlikely to have any impact on food production is incorrect.	which the Applicant considers to be the best available information.
WC-098	Soils and Agriculture	Farming and Food Security Technical Note	19.3. With regards to Section 5.1.4, the council considers that it would be a mistake to base any conclusions on a study that is 20 years old, given all the policy, economic and defence (both food and security) changes that have taken place during this time. Furthermore, as food has continued to be produced on this land during the intervening 20 years, the study clearly came to the wrong conclusion.	The report referred to has not been used to draw conclusions, only to aid in setting the context of farming in Wiltshire. The study precluded the current system of government farming subsidies and was based on the circumstance applicable to the time of writing. The report made a prediction but is not considered to have made a wrong conclusion.
WC-099	Soils and Agriculture	Farming and Food Security Technical Note	19.4. The council is concerned with Table 1 in that it shows a significant decrease in the amount of non-agricultural land, e.g. woodland, in Wiltshire and the increase in the amount of land that has been used for urban development, from 1.7% of the available land area to 5.5% in the last 50 years. With increased housing targets and demand for commercial development, there is likely to be increasing losses of land to urban development in the coming years, which would place an even greater pressure on food security. Agricultural land is a finite resource and cannot be created.	Increased pressure for housing and commercial development will also increase pressure for energy. Approximately 24 hectares of land within the Scheme will be sealed. The remainder will remain in-situ and will continue to fulfil a multitude of ecological functions whilst allowing the land and soil to rest and improve. The Scheme can therefore be considered to safeguard the land for future agricultural use which other 'hard' developments do not.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
WC-100	Soils and Agriculture	Farming and Food Security Technical Note	19.5. With regards to Section 5.2, Wiltshire Council assessed data that is available to them, and stands by the figures quoted in 5.2.1 by the Applicant. The only Grade 2 land that is currently being used for solar energy that the council could identify was on a brownfield site predominantly used for other activities.	The figures included in Section 5.2 by the Applicant are all derived from publicly available data. Wiltshire Council had previously stated that no Grade 2 quality land was identified as being used for solar development. That Grade 2 has now been identified on a brownfield site confirms that agricultural land quality can be maintained or restored once alternative development uses have ceased.
WC-101	Landscape and Visual Cultural Heritage	Applicant's Response to Other Parties' Response to Examining Authority's First Written Questions	20. 9.45 Applicant's Response to Other Parties' Responses to Examining Authority's First Written Questions [REV4-081] CH1.2 20.1. Agreement to the list of viewpoints was requested at an early stage, before the Applicant's heritage assessment had been received and prior to detailed site visits being undertaken with Applicant's team. The request for the additional viewpoint is made following detailed assessment of the submissions in response to areas where there appear to be a gap in understanding.	Please see ES Volume 2, Figure 8-14 Baseline Photography and Photomontages – Viewpoint 1 – 22 (Part 1) [REP2-010] to the viewpoint at Farleaze Farm. The Applicant considers the viewpoint confirms its assessment.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			20.2. However, following the recent meeting to discuss the SoCG, it is understood that access to allow the additional visualisation to be worked up is being sought.	
WC-102	Landscaping and Visual Cultural Heritage	Applicant's Response to Other Parties' Responses to Examining Authority's First Written Questions	CH1.6 20.3. The council has reviewed the Applicant's response and paragraph 1 is noted but this does not address the concerns raised. Therefore, the council maintains its position. The commitment to opening a dialogue with the owners of Grittleton House and to continuing discussion with the council is, however, welcomed.	The Applicant notes this comment but maintains its position that there would be no heritage-based impact to Grittleton House as a result of the installation of cabling in fields to the east of the property. The Applicant confirms its commitment to engagement with the owners of Grittleton House. This is so that the business owners at Grittleton House can understand how they are to be communicated with ahead of and during construction activities, and how they will be able to inform and influence construction works in this location, either as directly affected stakeholders or (if they wish to) as members of the Community Liaison Group.
WC-103	Human Health	Applicant's Response to Other Parties'	HW1.1 to HW1.3 20.4. Wiltshire Council welcomes the Applicant's commitment to establishing a Community Liaison Group (CLG) and to	The Applicant confirms its commitment to the provision of the CLG. The Applicant acknowledges the Council's recommendation to apply the principles of the Suffolk Supplementary Guidance Document (SGD) to

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
		Response to Examining Authority's First Written Questions	considering the principles set out within Suffolk County Council's Energy Projects and the Wellbeing of Communities guidance. The council agrees that meaningful and ongoing engagement with affected communities is an important component of mitigating potential impacts on community identity, cohesion and wellbeing. 20.5. However, the council maintains that the CLG should be viewed as only one element of a broader mitigation package. Whilst it may provide an effective mechanism for communication, information sharing and collaborative problem-solving, it is unlikely in isolation to fully address the potential mental health and wellbeing impacts associated with a development of this scale. These impacts may include increased stress, anxiety and uncertainty arising from prolonged construction activity, perceived changes to local character and landscape, and concerns regarding the long-term effects of the Scheme on local communities.	the post-consent phase, where relevant and appropriate principles from this guidance can be applied to the CLG's ToR. The Applicant fully recognises that the CLG is only a part of the Scheme's mitigation to mental health effects. These have been assessed (with no significant adverse effects to mental health anticipated) and the relevant mitigation proposed in ES Volume 1, Chapter 18: Human Health [APP-070]. Mitigation measures to reduce physical and mental health impacts from visual and landscape impacts to community sense of place, and from onsite construction, are secured through the Outline LEMP [REP5-079] and Outline CEMP [REP5-071] by Requirements 7 and 13 respectively of Schedule 2 to the Draft DCO [REP5-012].

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
WC-104	Human Health	Applicant's Response to Other Parties' Responses to Examining Authority's First Written Questions	20.6. The council therefore continues to support the inclusion of requirements securing: • A comprehensive Communication and Community Engagement Strategy, with clear, measurable and accountable actions to mitigate impacts on community identity, resilience and wellbeing; and • A Decommissioning Strategy which recognises and addresses community wellbeing impacts throughout the full lifecycle of the development.	The Applicant confirms that the provision of a Stakeholder Communications Plan is secured via section 2.15 the Outline CEMP [REP5-071] by Requirement 13 of Schedule 2 to the Draft DCO [REP5-012]. Mitigation for community wellbeing impacts during the operational lifetime of the Scheme are secured through the Outline OEMP [REP5-073] by Requirement 14 of Schedule 2 to the Draft DCO [REP5-012]. Finally, to ensure all phases of the Scheme are covered, community wellbeing mitigation at the decommissioning phase is secured through the Outline Decommissioning Strategy [REP5-075] by Requirement 20 of Schedule 2 to the Draft DCO [REP5-012].
WC-105	Human Health	Applicant's Response to Other Parties' Responses to Examining	20.7. The council also considers that the operation of the CLG should extend beyond construction and into the operational phase of the development, ensuring that communities retain an effective forum through which concerns can be raised, monitored and addressed over time.	The Applicant has committed to the CLG continuing at least for one full year following the final commissioning of the Scheme. This is secured through Requirement 4 of Schedule 2 to the Draft DCO [REP5-012]. Thereafter, community contact with the Scheme will be transferred to a community contact point within the Scheme's operational team, through whom

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
		Authority's First Written Questions		all community concerns can be raised, monitored and addressed throughout the operational lifetime of the Scheme. This role is secured through Table 12 in the Outline Operational Environment Management Plan [REP5-073] by Requirement 14 of the Draft DCO [REP5-012] .
WC-106	Human Health	Applicant's Response to Other Parties' Response to Examining Authority's First Written Questions	20.8. In addition, the council welcomes further discussion with the Applicant regarding the practical application of the Suffolk guidance, including consideration of measures that strengthen community resilience and wellbeing, such as support for community assets, community-led initiatives and local wellbeing services where these are demonstrated to mitigate identified impacts.	The Applicant confirms that the application of Suffolk Council's supplementary guidance has been applied where appropriate to the draft Terms of Reference shared with Wiltshire Council's Public Health team. The Applicant acknowledges the Council's recommendation to apply the principles of the Suffolk Supplementary Guidance Document (SGD) to the post-consent phase, where relevant and appropriate principles from this guidance can be applied to the CLG's ToR. This will be submitted for Wiltshire Council's approval pursuant to Requirement 4 of the Draft DCO [REP5-012].
WC-107	Human Health	Applicant's Response	20.9. The council notes that discussions on these matters remain ongoing through the Statement of Common Ground and welcomes	The Applicant confirms that discussions in relation to the provision and operation of the CLG are ongoing, with all updates recorded

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
		to Other Parties' Responses to Examining Authority's First Written Questions	the Applicant's commitment to continued working with Wiltshire Council to develop clear, proportionate and enforceable arrangements.	through the Statement of Common Ground with Wiltshire Council [EN010168/EXAM/8.2] (Revision 4).
WC-108	Landscape and Visual Matters	Applicant's Response to Submissions Received at Deadline 3	21. 9.46 Applicant's Response to Submissions Received at Deadline 3 [REP4-082] WC-028 21.1. Please also see comments provided on REP4-060 and REP4-062 above. 21.2. The council has repeatedly raised certain specific matters, both prior to and during the formal examination, and disagrees with the Applicant's description of two-way engagement with Wiltshire Council in relation to landscape and visual matters. 21.3. As an example, fundamental issues in relation to assessment of landscape fabric including its definition, omission of land use,	The Applicant recognises that differences in professional opinion exist between the Applicant and WC, however the Applicant maintains that the LVIA set out in ES Volume 1, Chapter 8: Landscape and Visual [REP3-025], has been undertaken with consideration of the appropriate and relevant guidance and robustly assesses both the landscape and visual effects of the Scheme independently to ensure both the impacts and effects on the fabric and character of the landscape are taken into account as well as the views and visibility. The Applicant consulted with WC on the methodology set out in ES Volume 3 Appendix 8-1 Landscape and Visual Impact Assessment Methodology [REP5-067] used

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			built fabric components, perceptual aspects and Zone of Influence (Zol) limits for cumulative assessment have been consistently highlighted, some as far back as EIA scoping and PEIR Stage Review stages. Each time the council has sought clarification on specific assessment methodology or raised outstanding landscape and visual matters as a concern during its formal written submissions, the Applicant's approach has simply been to either signpost the council to the relevant section of the Applicant's ES chapter, even where these same issues have been referenced within the council's formal written responses to date on these sections, including in its Relevant Representation [RR-4934], Written Representation [REP1-138], Local Impact Report [REP1-137], or initial draft of the SoCG with Wiltshire Council [REP2-025]. 21.4. The council acknowledges the Applicant has prepared a number of additional technical notes relating to landscape and visual matters seeking to address outstanding matters, however each time these technical notes are reviewed by the council the common conclusion	within the LVIA and adjusted accordingly prior to the submission of the DCO application to accommodate requests from WC, such as an extension of the Study Area for Cumulative Assessment to 10km. The LVIA Methodology is an agreed matter within the SoCG. The Applicant has sought to provide clarity where requested and provide additional information or assessment when requested. The Applicant has produced additional technical notes containing additional assessments as requested by both WC, the CNLB and the ExA. The Applicant recognises the Council's concerns but stands by the approach and findings undertaken within these assessments and being robust and in accordance with appropriate guidance.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			is they fail to provide any further meaningful explanation or information to actually address the council's concerns.	
WC-109	Socio-Economic, Tourism and Recreation	Applicant's Response to Submissions Received at Deadline 3	WC-035 21.5. Wiltshire Council confirms that discussions with the Applicant on the terminology used to describe the economic impact in the local area are on-going. The council have made the point that if the economic impact is as limited as the Applicant suggests then they should not have any concerns over a compensation scheme for local businesses, provided the eligibility criteria are robust enough to ensure only businesses that were previously viable and had a genuine claim would be compensated.	The Applicant confirms that ongoing discussions with Wiltshire Council (as documented through the Statement of Common Ground with Wiltshire Council [EN010168/EXAM/8.2] (Revision 4) process) are sought to understand the difference in judgement on economic impacts from the Scheme. It is the Applicant's position that because the economic impacts from the Scheme can be suitably mitigated by the measured already secured through the management plans relevant to the requirements of Schedule 2 to the Draft DCO [REP5-012], that a business compensation scheme as referred to by Wiltshire Council is not necessary. Please refer to the response to SE2.1 above, and in The Applicant's Response to the Examining Authority's Second Written Questions [REP5-097] which sets out the reasoning for the Applicant's objection to the

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				business compensation scheme requested by Wiltshire Council.
WC-110	Socio-Economic, Tourism and Recreation	Applicant's Response to Submissions Received at Deadline 3	21.6. The council are disappointed to read that the Applicant feels the matter of monitoring local businesses during the operation of the scheme is still under discussion, particularly as in the July version of the Statement of Common Ground, it was the council's understanding that the Applicant had noted this as agreed.	The Applicant confirms that discussions with Wiltshire Council (as documented through the Statement of Common Ground [REP5-087] process) are ongoing to understand the extent of business monitoring Wiltshire Council are referring to. Business monitoring has not specifically been committed to by the Applicant: we believe this comment first came from Wiltshire Council in para 4.3 of their Comments on any other submissions received at deadline 2 [REP3-141]. The Outline Skills, Supply Chain and Employment Plan [REP3-104] commits to

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				monitoring and reporting of KPIs against which the efficacy of the Plan is to be measured, which would include some level of interaction with local businesses. The Applicant considers this provides a sufficient monitoring obligation for the Applicant and is secured through Requirement 18 of Schedule 2 to the Draft DCO [REP5-012] .
WC-111	Socio-Economic, Tourism and Recreation	Applicant's Response to Submissions Received at Deadline 3	WC-043 21.7. The council's preferred mechanism is to secure the PRow contribution via a Section 106 agreement as it provides transparency and commitments to funds and mitigates against any possible risks in the future. The council is in active discussions with the Applicant on the appropriate mechanism,	Please refer to the Applicant's response to SE2.6a above, and to SE2.6 overall in The Applicant's Response to the Examining Authority's Second Written Questions [REP5-097] .
WC-112	Landscaping and Visual	Applicant's Response to Submissions	WC-044 21.8. This merely repeats the area of disagreement with the council in respect of the application of Development Plan policy and the	The Applicant notes this comment and stands by their response contained within WC-044 of the Applicant's Response to Submissions Received at Deadline 3 [REP4-082] .

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
		ns Received at Deadline 3	understatement of harmful adverse landscape effects. The Applicant's response provides no new evidence to allay the council's concerns.	
WC-113	Landscape and Visual	Applicant's Response to Submissions Received at Deadline 3	WC-045 21.9. The response does not provide any definitive proposals for dealing with the issues of concern raised in the council's response to the ExA's first written questions LV1.4 [REP3-142].	Should the Scheme receive consent then greater detail would be provided through the preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the Outline LEMP [REP5-079] . This is secured through Requirement 7 in Schedule 2 of the Draft Development Consent Order [REP5-012] .
WC-114	Landscape and Visual	Applicant's Response to Submissions	WC-046 21.10. The council has made it clear in writing and at ISH2 that it considers the entire area to the north of the route of the Fosse Way to be within the setting of the CNL and that the effects of the proposals cannot be adequately	The Applicant notes this comment and the position made by the Council regarding their identification of the setting of the CNL. However, the Applicant stands by their response contained within WC-046 of the

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
		Received at Deadline 3	mitigated. The Applicant's response does not provide any additional evidence to enable the council to modify its position.	Applicant's Response to Submissions Received at Deadline 3 [REP4-082].
WC-115	Landscape and Visual	Applicant's Response to Submissions Received at Deadline 3	WC-047 21.11. The council maintains its view regarding the scale of the development, the significantly negative landscape and visual effects and the unsuitability of the mitigation to the extent that in itself it will change the character of the receiving landscape. The council does not recognise the Applicant's description of the development areas as being 'independent' or 'discrete' as the sites are very large and closely interconnected. The majority of the information provided by the Applicant is taken from their existing documentation and is at odds with the council's assessment of the effects of the proposals on the receiving landscape and their long-term effects on the Limestone Lowland Character Type and	The Applicant notes this comment and maintains that the LVIA set out in ES Volume 1, Chapter 8 Landscape and Visual [REP3-025] , has robustly assessed both the landscape and visual effects of the Scheme independently to ensure both the impacts and effects on the fabric and character of the landscape are taken into account as well as the views and visibility, acknowledging that there would be there would be an immediate significant adverse change to the character of the Sites themselves and their immediate surroundings as they change from an area of arable farmland to solar infrastructure.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			Hullavington Rolling Lowland Landscape Character Area.	
WC-116	Description and DCO Process	Applicant's Response to Submissions Received at Deadline 3	WC-048 21.12. The council considers that its position is clear. This is as included within the council's Relevant Representation [RR-4934], Written Representation [REP1-138] and Local Impact Report [REP1-137].	The Applicant notes this comment.
WC-117	Landscape and Visual	Applicant's Response to Submissions Received at Deadline 3	WC-049 21.13. This is a reiteration of the Applicant's views of the scheme and the mitigation and does not add any new information to the previous discussion. The council, however, does not agree that the LVIA has undertaken a worst-case assessment in accordance with the principles in the Rochdale Envelope. This is because the council does not consider that the Applicant has provided sufficient information regarding the specifics of the scheme for a full and accurate assessment to be undertaken and	The Applicant strongly disagrees with Wiltshire Council's assertion that the Landscape and Visual Impact Assessment has not undertaken a worst-case assessment in accordance with the principles of the Rochdale Envelope. ES Volume 1, Chapter 6: EIA Methodology [APP-058] states clearly that not all technical details are determined at the stage of DCO application and examination and would not be known until post consent of the DCO. Therefore the 'Rochdale Envelope' approach has been applied within the Environmental Statement to

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			therefore does not, in the Council's opinion, fulfil the requirements of the Rochdale Envelope.	ensure a robust assessment of the likely significant environmental effects of the Scheme, in accordance with the Planning Inspectorate's Advice Note Nine: Using the Rochdale Envelope as clearly stated in ES Volume 1, Chapter 6 EIA Methodology [APP-058]. The approach is adopted for each technical discipline, where the maximum (and where relevant, minimum) parameters for the elements where flexibility needs to be retained have been assessed under the Rochdale Envelope approach. The approach also recognises that the worst-case parameter for one technical assessment may differ from another, ensuring that worst case overall impacts are predicted. Paragraphs 8.9.40 to 8.9.43 of ES Volume 1, Chapter 8 Landscape and Visual [REP3-025], set out that the parameters assessed are as set out in ES Volume 1, Chapter 3 The Scheme [APP-055] and further outlines the key design elements and the flexibility required for the Scheme that are relevant to the LVIA process,

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				which include PV panels (fixed and tracker), conversion units and the BESS. The parameters of the Scheme, by which the Scheme has been designed and the Environmental Impact Assessment undertaken are secured in the Design Principles and Parameters [REP4-043].
WC-118	Description and DCO Process	Applicant's Response to Submissions Received at Deadline 3	WC-050 21.14. The council notes the Applicant's comments, however the council considers that its position is clear.	The Applicant notes these comments.
WC-119	Socio-Economic, Tourism and Recreation	Applicant's Response to Submissions Received	WC-053 21.15. The council has reviewed the Applicant's response; however, it is unclear how the conclusion that it is not "likely that there would be a significant adverse effect to the business" has been reached. Therefore, the comment	The Applicant refers to its response to WC-101 in the Applicant's Response to Submissions Received at Deadline 3 [REP4-082] which gave the assessed reasoning for why noise and visual impacts on users of Grittleton House were not considered significant. In addition, the Applicant has committed to minimising impacts

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
		at Deadline 3	does not address the concerns raised in the initial comment and the council maintains its position in this regard.	through adopting good working practices during construction through the Outline CEMP [REP5-071] . This document also secures the Stakeholder Communication Plan, through which the owners of Grittleton House will be kept informed of construction works, and give opportunity for the Applicant to be made aware of key events to minimise disruption. These measures are therefore secured through Requirement 13 in Schedule 2 to the Draft DCO [REP5-012] . The Applicant confirms that following prior engagement in May 2026, discussions with the owners and operators of Grittleton House are being organised to discuss the likely significant effects of the siting of the construction compound and Cable Route Corridor on the business at Grittleton House. These are to supplement discussions held earlier in the examination process which focused on heritage effects. The Applicant seeks to use these discussions to provide more detail and assurance to the owners and operators of Grittleton House.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
WC-120	Transport and Access	Applicant's Response to Submissions Received at Deadline 3	WC-054 21.16. The council has reviewed the Applicant's response; however, this does not address the concerns raised in the initial comment. Therefore, the council maintains its position in this regard. 21.17. However, following the SoCG discussion earlier this week, clarification on the details of the Highway Improvement Scheme has been received from the Applicant and the council considers that it seems likely that this issue will be resolved.	The Applicant notes this comment.
WC-121	Soils and Agriculture	Applicant's Response to Submissions Received at Deadline 3	WC-057 21.18. Please see comments relating to Farming and Food Security above.	The Applicant notes this comment.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
WC-122	Landscape and Visual	Applicant's Response to Submissions Received at Deadline 3	WC-062 / WC-064 21.19. The council stands by its view that the proposal is not and has not been, landscaped. The Applicant has not followed what the council considers to be the fundamentals of a landscape led scheme as set out in WC-002 [REP2-039].	The Applicant notes this comment and respectfully disagrees with WC and reaffirms the comments made within WC-062 and WC-064 of the Applicant's Response to Submissions Received at Deadline 3 [REP4-082] .
WC-123	Description and DCO Process	Applicant's Response to Submissions Received at Deadline 3	WC-063 21.20. The council maintains its stance in respect of non-compliance with Core Policy 51, which must remain a material consideration.	The Applicant notes this comment and maintains its position as set out in its response to WC-063 in Applicant's Response to Submissions Received at Deadline 3 [REP4-082]
WC-124	Description and	Applicant's Response	WC-065 / WC-066	The Applicant refers to its response to WC 088 – 093 above.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
	DCO Process	to Submissions Received at Deadline 3	21.21. Please see comments to REP4-078 above.	
WC-125	Description and DCO Process	Applicant's Response to Submissions Received at Deadline 3	WC-069 21.22. The council's concerns have not been answered and therefore this issue remains outstanding. See also response to REP4-054 above.	The Applicant notes this comment.
WC-126	Soils and Agriculture	Applicant's Response to Submissions	WC-070 21.23. The illustrative example provided by the council related only to the BESS access track; the council has subsequently updated its calculations in relation to new information	The Applicant notes this comment.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
	Transport and Access	Received at Deadline 3	provided by the Applicant within their response to ISH2, Action Point 1 [REP4-085], which confirms at in Table A-1 'Summary of vegetation Gains and Losses' of Annex A that a total of 24.1 hectares of agricultural land is proposed to be surfaced with hard surfacing materials within Lime Down Areas A to E. See further detailed comments on REP4-054 above.	
WC-127	Soils and Agriculture	Applicant's Response to Submissions Received at Deadline 3	WC-071 21.24. The council accepts that the Applicant's proposed maximum soil stockpile heights and slope gradients for bunds, as now incorporated into the Outline Soil Resource Management Plan (Rev 3) [REP4-054], align with industry best practice. However, the long timeframes for storage (60 years) pending re-use, significantly exceed accepted industry best practice timeframes, and the council maintains concerns about unknown locations and forms for soil stockpiles. See further detailed comments and revised stockpiling calculations included under comments on REP4-054 above.	The Applicant is not aware of industry best practice specifically relating to the maximum timeframe for a stockpile. The Institute of Quarrying Good Practice Guide for Handling Soils in Mineral Workings (2021) notes "In the case of particularly large mounds with long storage durations, it may be acceptable for the subsoil to be covered with a layer of topsoil to its natural depth and utilised for landscape, agricultural or amenity purposes." Defra's Construction Code of Practice notes "The decision relating to the length of storage will be made within the context of the extant planning permission or agreed programme of works."

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				Additional considerations on stockpile locations in terms of spatial and environmental constraints are included in the Outline SRMP [EN0101/APP/7.15] (Revision 5) submitted at Deadline 6.
WC-128	Site Selection and Alternatives	Applicant's Response to Submissions Received at Deadline 3	WC-072 21.25. The council's response to Action Point 16 for ISH2 was provided within its Post Hearing Submissions [REP4-092] and appended plans included at Appendix C showing suggested reduction in solar panel field areas close to and approaching the village.	The Applicant notes this comment and confirms that it has reviewed WCs response to Action point 16 and has provided written response in the Applicant's Response to Submissions Received at Deadline 3 [REP4-082] , submitted at Deadline 4.
WC-129	Landscape and Visual Noise and Vibration	Applicant's Response to Submissions Received at	WC-073 21.26. The Applicant's comment is noted. The council will review and provide further comment on the 'updated Tranquillity Assessment' once it is submitted into the examination.	The Applicant notes this comment and confirms that the Tranquillity Assessment - Effects of Construction Traffic on the Cotswolds National Landscape [REP5-099] was submitted into Examination at Deadline 5.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
		Deadline 3		
WC-130	Description and DCO Process	Applicant's Response to Submissions Received at Deadline 3	WC-101 21.27. The council has reviewed the Applicant's response; however, this does not address the concerns raised within the initial comment. Therefore, the council maintains its position in this regard.	The Applicant notes this comment, but maintains its position that there would be no heritage-based impact to Grittleton House as a result of the installation of cabling in fields to the east of the property.
WC-131	Description and DCO Process	Applicant's Response to Submissions Received at Deadline 3	WC-100 21.28. The council has reviewed the Applicant's response; however, this does not address the concerns raised within the initial comment. Therefore, the council maintains its position in this regard.	The Applicant refers to its response to WC-126.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
WC-132	Descriptions and DCO Process	Applicant's Response to Submissions Received at Deadline 3	WC-101 21.29. The council has reviewed the Applicant's response; however, this does not address the concerns raised. Therefore, the council maintains its position in this regard. 21.30. It is noted and welcomed that the Applicant will continue to discuss the wording of the outline oCEMP [REP4-050] and any additional mitigation that can be considered.	The Applicant refers to its response to WC-126. The Applicant confirms it will continue to discuss the wording of the Outline CEMP [REP5-071].
WC-133	Landscaping and Visual Cultural Heritage	Applicant's Response to Submissions Received at Deadline 3	WC-102 21.31. The council has reviewed the Applicant's response; however, this does not address the concerns raised. Therefore, the council maintains its position in this regard. However, the council welcomes the comment that the Applicant is committed to ongoing engagement with the owners of Grittleton House and to consideration of further mitigation.	The Applicant refers to its response to WC-126. The Applicant confirms that it is continuing to engage with the owners of the property at Grittleton House. These discussions will cover what construction impacts at this location are anticipated to consist of, how long those works are likely to take place, and what this means for their business and clientele.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
WC-134	Landscaping and Visual Cultural Heritage	Applicant's Response to Submissions Received at Deadline 3	WC-102 21.32. The council welcomes the commitment to further dialogue with the owners of Grittleton House and consideration of additional mitigation.	The Applicant refers to its response to WC-130.
WC-135	Transport and Access	Applicant's Response to Submissions Received at Deadline 3	WC-104 21.33. The council has reviewed the Applicant's response; however, this does not address the concerns raised. Therefore, the council maintains its position in this regard. 21.34. However, following the SoCG discussion earlier this week, clarification on the details of the Highway Improvement Scheme has been received from the Applicant and the council considers that it seems likely that this issue will be resolved.	The Applicant notes this comment.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
WC-136	Landscape and Visual Cultural Heritage	Applicant's Response to Submissions Received at Deadline 3	VJS-001 21.35. The council shares the concerns of the owners of Grittleton House and have set out their own comments in detail (notably in the Wiltshire Council 'Response to comments submitted at Deadline 2' [REP3-141], and specifically with regard to WC-083 under 9.22 The Applicant's Response to Written Representations. 21.36. The Applicant's responses do not acknowledge the potential for impact and fail to address the concerns raised, but the council welcomes the commitment to opening further dialogue with the owners of Grittleton House and consideration of additional mitigation.	The Applicant notes this comment but maintains its position that there would be no heritage-based impact to Grittleton House as a result of the installation of cabling in fields to the east of the property.
WC-137	Description and DCO Process	Written Summary of the Applicant's Oral Submissions and Responses at Issue	22. 9.50 Written Summary of the Applicant's Oral Submissions and Responses at Issue Specific Hearing 3 and Responses to Action Points [REP4-086] Agenda Item 1: Participant Introductions. 22.1. Whilst a minor point, it is noted that the listing of Wiltshire Council officers in attendance and introducing themselves during ISH3	The Applicant notes this comment.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
		Specific Hearing 3	excludes those from the Highways team, so [REDACTED]. It is also noted that SLD's Transport Consultant [REDACTED] is also missing.	
WC-138	Transport and Access	Construction Traffic HGV Forecasting	Agenda Item 2.2 Construction Traffic HGV Forecasting 22.2. The Applicant notes that "An initial allowance was made for 600,000 solar PV panels (1,200 deliveries), based on standard containers, assuming 500 panels per HGV. If high-cube containers are used (720 panels per delivery), this would allow for 864,000 solar panels with the same number of deliveries". In the Wiltshire Council Comments on Submissions Received at Deadline 3 [REP4-091], and specifically those made in relation to 9.34 Applicant's Response to Stop Lime Down Written Representation – Appendix D Transport Report, the council noted that "Annex E to the latest Transport Assessment (Rev 3) still advises that the overall PV component quantum over the five Lime Down Solar Park sites is expected to be 588,988, which based	Please see the Applicant response TT2.1 in The Applicant's Response to the Examining Authority's Second Written Questions [REP5-097] .

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			on the 469ha (1159 acre) area would yield a PV Module density of 508 per acre. This would appear to be insufficient to generate the 1MW output sought from every 2.4-acre area equipped with panels". This was in response to the Applicant's comment that "NPS EN-3, paragraph 2.10.17, indicates that 2-4 acres will be required for each MW of output, with 50MW of generation requiring 125 to 200 acres and 100,000 to 150,000 panels. This equates to a panel density of 750 to 800 panels per acre". A satisfactory response to this query remains outstanding, despite the Applicant citing the SLD PV delivery figures as too high. It is further noted that the same point is made in the Deadline 4 SLD response to the Applicant's Deadline 3 replies (para 3.2.2 and Table paragraph reference item 2.1.7: Calculation of Numbers of Solar Panels) [REP4-132]. It is also noted that the Examining Authority pose the same question in EXQ2 (TT2.1).	

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
WC-139	Transport and Access	Construction Traffic HGV Forecasting	22.3. It is stated that: <i>"The Council's overarching position is that no control has been proposed over HGV movements, and the risk the Council wants to avoid is significant overestimation or underestimation going unchallenged. The Council wants the ExA to have confidence that the figures are realistic and that the concerns raised by Stop Lime Down have been properly addressed. The Council remains concerned that [REDACTED] issues have not been sufficiently responded to and proposed to review [REDACTED] next submission and respond in writing. [REDACTED] assessment is to be submitted at Deadline 4, with a caveat that more information from the Applicant will be required"</i>. 22.4. Comments on [REDACTED] comments in the SLD Deadline 4 response [REP4-132] are included as part of this overarching submission. However, whilst such crucial differences exist over the actual number of PV modules and so potentially the number of supporting structures as well, the council's concern that HGV	The Applicant confirms that the Solar PV module figure being used for its updated assessments is 842,000 modules. In response to the representations made by SLD and Wiltshire Council, the Applicant has reviewed the indicative design to establish the realistic maximum number of modules that could be installed within the Work No. 1(a) areas, which total 385.3ha as defined in the Works Plan [REP5-006]. This number is derived from an indicative high-density layout based on a 3-panel (3P) fixed-tilt configuration. The Applicant notes that the very large numbers in SLD's Transport Assessment Annex D [REP1-172], which suggested over a million panels, were based on incorrect calculations. The Applicant's maximum design scenario has a density of 2,186 panels per hectare (885 per acre). When assuming module outputs of 640W per panel currently being used on another IGP scheme currently undertaking detailed design at West Burton, this configuration results in 1.76 acres per MW. While more intensive than the typical range of 2 to 4 acres per MW referred to in NPS EN-3, it

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			movements are potentially being underestimated will and do remain.	aligns with paragraph 2.10.17, which states that densities will "<i>vary significantly depending on the site</i>" and are expected to change over time as technology continues to evolve to become more efficient. As requested, the Applicant has provided a comprehensive rebuttal to SLD's revised HGV Trip Generation Report in Post hearing submissions [REP4-132]. The Applicant's response is set out in the Highways Technical Note in response to Appendix A of the SLD Deadline 4 submission [REP5-107], submitted at Deadline 5. This submission includes the Applicant's estimated numbers for construction traffic movements and flow diagrams, presented in the same format and presentation as pages 140 to 143 of Post hearing submissions [REP4-132] to facilitate a direct comparison. The Applicant's rebuttal also includes a full response to the points raised by Wiltshire Council and SLD at ISH3 regarding Table 2 of Written Representation, Appendix D (Transport Report) [REP1-172], which

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				compares HGV delivery ratios across five other solar projects. This detailed narrative explains the technical and site-specific reasons for differences in delivery profiles and demonstrates how the Scheme remains within the range of established industry precedents. The updated trip generation calculations demonstrate that the number of deliveries remains a robust and reasonable worst-case assessment. Trip generation calculations have been updated to provide more detail. It also demonstrates that the number of calculated deliveries is capable of delivering up to 842,000 panels if using High Cube Containers.
WC-140	Transport and Access	Highway User Safety	Agenda Item 2.4 Highway User Safety 22.5. This is considered an accurate record of the ISH3 dialogue on the operational and safety concerns regarding the ability of two HGVs to pass along the narrow rural roads proposed for access to the solar PV sites. The Applicant post-hearing actions below are noted, and the council's comments on these plans are included	The Applicant notes this comment.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			on the Transport Assessment and the oCTMP above. <i>"The Applicant has provided the following:</i> <i>• Additional plans in Annex I of ES Volume 3 Appendix 13-1: Transport Assessment [EN010168/APP/6.3] (Revision 4) (Drawing PL109B) which shows the width of construction routes.</i> <i>• Appendix E in the Outline Construction Traffic Management Plan [EN010168/APP/7.22] (Revision 4) which includes proposed Highway Improvement Area Drawings for road widening and AIL movements"</i>	
WC-141	Transport and Access	Highway Improvement Areas	Agenda Item 2.5 Highway Improvement Areas (HIAs) 22.6. This is considered an accurate record of the ISH3 dialogue on the proposed extent of HIAs. It is noted in the text that <i>"Mr Darrall confirmed that passing points along the Fosse Way within the order limits are shown in plans submitted for Deadline 4, and that improvements are intended for the Fosse Way"</i>. Highway Development Management	The Applicant notes this comment.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			comments on these passing place additions are made in reviewing the latest Transport Assessment (above).	
WC-142	Transport and Access	Monitoring	Agenda Item 3.4 Monitoring 22.7. The council would like to thank the Applicant for the productive discussions held to date on the future funding mechanisms in relation to this scheme. The council is in ongoing discussions with the Applicant on this matter, and the council looks forward to receiving the first draft of the agreements to review.	The Applicant notes this comment.
WC-143	Description and DCO Process	Article 2	23. 9.51 Written Summary of the Applicant's Oral Submissions and Responses at Issue Specific Hearing 4 and Response to Action Points [REP4-087] Agenda Item 2.1 Article 2 – Interpretation: Definition of 'maintain' and whether the wording is precise enough 23.1. It is noted that alternative drafting has been provided by Wiltshire Council at Deadline 4 (ISH4 Action Point 2) [REP4-092] and that the Applicant will review this. The council will	The Applicant notes this comment.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			provide further representations on this matter once the Applicant's response is available.	
WC-145	Transport and Access	Articles 10 and 15	Agenda Item 2.3 Articles 10 and 15 – Justification for power to alter streets outside of the Order Limits, the street authority consenting provisions and the timeframe for issuing consent 23.2. This is considered an accurate record of the ISH4 dialogue. The Applicant's interpretation of 'Road Works' in the draft Wiltshire Council 'Protective Provisions' and deemed extent of applicability is a useful one, so the statement in the Post Hearing Note: "as any works outside of the Order limits would be authorised by the DCO via Article 10 or Article 15 they would be subject to the protective provisions". This provides the necessary Highways Development Management comfort in respect of required Technical Approvals. However, as also alluded to by Ms Broderick "the process under Section 278 does not have any timescales and the Applicant is therefore ensuring through the DCO process that the required information is provided to Wiltshire	The deemed approval mechanism is entirely standard for Nationally Significant Infrastructure Projects to facilitate timely and certain delivery of the project. Deemed approval incentivises the Council to provide a substantive response within the required timeframes, which then allows the issues that may present a barrier to approval to be resolved through the dispute resolution mechanism. The Council's in-principle opposition to such a mechanism is noted but this is typical for NSIPs.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			Council and that the Wiltshire Council reviews this information within a set period. If Wiltshire Council does not review that detail, then there is either a mechanism for appeal or a deemed consent process". This over-arching DCO power to undertake highway works outside the Order Limits throughout the life of the DCO is thus a concern, as the potential scale of any future works is unknown, so the necessary time for proper review and approval may be variable. As such, an assumed 'deemed consent' for highway works outside the Order Limits if all approval matters are not resolved within a set period in all cases is not acceptable or reasonable. This remains the council's position, in that there is no need to circumvent the normal Wiltshire Council s278 Agreement process or indeed the standard requirements within the Wiltshire Council Permit Scheme.	
WC-146	Transport and Access	Article 11	Agenda Item 2.4 Article 11 - Construction and Maintenance of Altered Streets 23.3. It would be the Council's Highways Development Management interpretation that this Article (11) only relates to highway works or	Article 11 applies to any works the Applicant is carrying out pursuant to the power in Article 10. Article 10 provides the statutory authority to undertake works to the highway. Such works will include the anticipated works required for the Scheme together any other works to the

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			alterations to roads carried out by the Applicant and the maintenance of these works through the agreed defects period. This appears to be the Applicant's view, noting the statement that: "Article 11 only requires the repair of damage as a result of highways works carried out by the Applicant. However, there are provisions in the CTMP to deal with any damage caused as a result of the use of the roads which the Applicant is not altering. Article 11 only relates to altered streets and includes the works done to the streets and the maintenance of those works". 23.4. However, it is then stated by the Applicant that <i>"Ms Brodrick clarified that Article 11 applies where there are known works to the highway but if the Applicant had to do other works to the highway to facilitate the Scheme or to repair any damage caused by the Scheme, then this would be covered by Article 11. Therefore, the Applicant's position is that this obligation is wider than Wiltshire Council envisages"</i>. However, this seems to contradict the point that only areas subject to original direct works by the Applicant are	highway to facilitate the Scheme that are identified during detailed design, or to repair damage caused by the Scheme. As the Applicant explained at Issue Specific Hearing 4, the CTMP also requires the Applicant to repair unknown damage to the highway network caused by traffic movements as a result of the Scheme. This obligation would require the Applicant to undertake the necessary road condition surveys and make repairs to roads where defects or carriageway structural failures are reasonably attributable from construction activities of the Scheme. The statutory authority required to undertake the works required under the CTMP is given in Article 10.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			covered by Article 11, so only local remedials to these areas.	
WC-147	Transport and Access	Article 14	Agenda Item 2.5 Article 14 - Access to Works 23.5. The detailed design approval requirements for the vehicular access locations listed in Schedule 7 will be secured through the Wiltshire Council Protective Provisions in Schedule 15 to the DCO when agreed and finalised. It is noted that the Applicant states that "There is a requirement under the CTMP to provide that level of design detail, and therefore it is not needed in the operative provisions. The access to works powers gives the Applicant the statutory power to do works to the highway via the DCO, and then the detailed design is covered by the CTMP". So, there is no reference to the Protective Provisions. The council's continued view is that the CTMP is not the mechanism for agreeing the design of permanent highway works, even though it is written in. However, it is the council's expectation that the Protective Provisions will.	The Council's in-principle opposition to the use of outline and detailed management plans as a mechanism for securing these details in a DCO is noted but the Applicant maintains its position that the CTMP is an appropriate mechanism for the Development Consent Order to require detailed design information to be submitted and approved. In any event the Applicant has received Wiltshire Council's most recent comments on the draft protective provisions on 11 August 2026 and anticipates responding to these shortly after Deadline 6.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
WC-148	Climate Change and Energy Need	Capacity of National Grid	24. Post Hearing Submission from Aileen Hood [REP4-099] 24.1. Wiltshire Council has already commented on food security issues above, so will not repeat them here. However, Ms Hood does make a valid point regarding the grids capacity to cope with increasing amounts of renewable energy and NESO's ability to manage the supply of renewable energy and distribution to end users, potentially resulting in an increased likelihood of blackouts.	In relation to the grid comments, the Applicant is not aware of any utility scale energy generation projects in the UK which have been constructed and are fully ready to connect, are "sitting un-connected". It is the government's policy to enhance the grid in parallel with consenting projects. This is necessary to ensure that a "<i>robust pipeline of deliverable projects</i>" (Clean Power 2030 Action Plan, p11) can be deployed at the pace and scale required to meet government's targets. Further information on grid reform and connections prioritisation is available in Section 2.7 and Section 2.9 of the Statement of Need [REP1-085]. The Applicant confirmed at Agenda Item 6.1 of Written Summary of the Applicant's Oral Submissions and Responses at Issue Specific Hearing 1 and Responses to Action Points [REP1A-012] that it has "<i>accepted a connection offer to the National Electricity Transmission System (NETS) at National Grid's existing Melksham 400kV substation. The agreement is for 500MW (AC) of export and</i>

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				250MW (AC) of import. As part of NESO's connection reform activities, the solar element of the Scheme has been re-prioritised as Gate 2 Phase 1" i.e. with connection in 2030 or earlier. The NETS is expected to be ready to connect the Scheme and capable of safely transmitting the power generated by it to both local and national consumers, from the Gate 2 Phase 1 connection date. This approach is entirely consistent with the government's policy to ensure that "our supply of energy always remains secure, reliable, affordable, and consistent with meeting our target to cut GHG emissions to net zero by 2050" (NPS EN-1 paragraph 2.3.3).
WC-149	Description and DCO Process Socio-Economic, Tourism and	Further Information Requested by the ExA	25. Any Further Information Requested by the ExA Submitted by Dermot Farrington [REP4-107] 25.1. Wiltshire Council would like to thank Mr Farrington for his comprehensive response to the ExA's question, which supports comments previously made the council regarding the impact of the proposed scheme on the equine	The Applicant notes this comment and confirms it has, where practicable, used to the representations made by Mr Farrington to ensure the assessment of the equine businesses surrounding the Scheme, as presented in the Equine Business Report [REP5-105] robustly assesses the Scheme's impact on the equine industry and its supply

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
	Recreation		sector in the local area and beyond. It also reinforces the council's belief that the economic impact of the scheme locally will be severe, rather than adverse as the Applicant contends.	chain. The report finds that with the mitigation measures proposed to control noise, dust emissions, visual impacts, PROW impacts and HGV movements, (secured by the management plans under Requirements 7, 13, 15 and 16 in Schedule 2 of the Draft DCO [REP5-012]) that no significant effect to employment of economic performance of businesses within the equine sector is anticipated.
WC-150	Description and DCO Process Socio-Economic, Tourism and Recreation	Further Information Requested by the ExA	26. Any Further Information Requested by the ExA Submitted by January Farrington [REP4-116] 26.1. Wiltshire Council acknowledges this comprehensive submission highlighting the importance of the equine sector in the area affected by the Lime Down proposal and requests that the ExA gives it due weight when preparing its Recommendation Report for the Secretary of State.	The Applicant notes this comment and refers to the Equine Business Report [REP5-105] which provides response to concerns about the Scheme made in respect of equine health, safety of handlers and workers, and economic impacts on equine businesses.
WC-151	Socio-Economic, Tourism and	Equine Survey	27. Comments on Responses to the ExA's First Written Questions from January Farrington [REP4-117]	The Applicant considers that the survey undertaken and the methodology used for the Equine Business Report [REP5-105] has been suitably robust and has considered a wide range of equine businesses operating in the

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
	Recreation		27.1. From the issues raised within this response, Wiltshire Council are concerned that the equine survey may not be as robust as originally hoped. Whilst the council will reserve judgement until it has had a chance to review the information prepared by the Applicant following its submission into examination, the methodology employed may result in any conclusions that the Applicant draws being treated with caution. Furthermore, the council wishes to highlight that the Applicant has not provided Wiltshire Council with a copy of the survey, despite being one of the bodies that asked for it or asked the council to help identify businesses and individuals that it should be sent to.	Local Impact Area, including all business likely to be directly affected by the Scheme. The Applicant notes this comment and as indicated will await responses submitted at Deadline 6.
WC-152	Description and DCO Process	Post Hearing Submission from Stop Lime Down	28. Post Hearing Submission from Stop Lime Down [REP4-132] 28.1. The council's Highways Development Management officer comments initially below on SLD's comments on the Applicant's Response to their Written Representation Appendix D Transport Report (Paragraph 3.2.2). However, the council is also from	The Applicant notes this comment.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			comments made by the Examining Authority at ISH3 that this did not include a full response or rebuttal to comments made by SLD in their Appendix D:	
WC-153	Transport and Access	Post Hearing Submission from Stop Lime Down	Section 3.2 Traffic and Transport – Paragraph 3.2.2 28.2. Table: Paragraph 2.1.7: Calculation of the Number of Solar Panels: SLD state: that <i>“the Applicant is assuming 600,000 modules. The Applicant therefore bases its calculations of transport movements on only 65% of the number of modules that would be calculated using the figures in EN-3”</i> . This point is supported, and the council has raised the same query in a past Highways response.	The Applicant has provided a rebuttal to Stop Lime Down's revised HGV Trip Generation Report included in Appendix A of Post hearing submissions [REP4-132] in Highways Technical Note in response to Appendix A of the SLD Deadline 4 submission [REP5-107] . This was submitted at Deadline 5. Trip generation calculations have been updated to provide more detail. It also demonstrates that the number of calculated deliveries has the potential to deliver up to 842,000 panels if using High Cube Containers.
WC-154	Transport and Access	Post Hearing Submission from Stop Lime Down	28.3. Table: Paragraph 2.1.8: Meaning of 50% Buffer: SLD state that: <i>“Para. 1.5.4 of the TA makes it quite clear that the 50% uplift is not to allow for increased numbers of trips but to allow for day-to-day variation in trips: “it is acknowledged that there will be small peaks throughout the construction phase, especially during preparation of the Order Limits. To</i>	The 50% factor can be both, the AADT factor (assuming a peak flow occurs everyday for two years) also adds a further uplift. The uplift was necessary prior to entering the detailed design phase and onboarding final contractors. The applicant has revised its trip gen calculations

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			<i>account for this, a 50% uplift has been applied for the purposes of assessment". The Applicant is now saying that the 50% uplift covers underestimates of predicted trip generation. This would mean that what was originally a "worst case" day, is now the average day".</i> This view is supported by the council. The 50% uplift factor is not to be used as a 'catch-all' to mask deficiencies in the baseline trip generation calculations in predicting the average likely number of daily HGV trips. The latter needs to be robust, with the 50% only then applied to give potential 'peak' daily figures.	since and is meeting WC on the 18/08/26 to discuss further.
WC-155	Transport and Access	Post Hearing Submission from Stop Lime Down	28.4. Table: Paragraph 2.1.12 BESS Containers: Taking the total of 270 BESS units, each requiring transport in two parts and on a 16.5m articulated HGV in each case, it is hard to see how the Applicant's estimate of only 425 is a reasoned worst-case. The SLD view that a potential underestimate exists for this is supported.	The trip generation calculations have been updated based on discussions with SLD and submitted at deadline 5 in the Highways Technical Note in response to Appendix A of the SLD Deadline 4 Submission [REP5-107]. This includes 270 HGVs for the BESS units (LWH, 6.0582.4382.896) - Standard size is a 20' HC container (5MWh per container) - 1 unit per HGV (Confirmed by Canadian Solar) - 43 tonne weight.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
WC-156	Transport and Access	Post Hearing Submission from Stop Lime Down	28.5. Table: Paragraph 2.1.14 Depth of BESS and Substation Foundations: An average concrete foundation depth of 0.3m seems too low for these structures especially if, as noted, the latest ES Appendix 3-1 cites a possible foundation depth which is considerably greater.	ES Volume 3, Appendix 3-1: Substations and Battery Energy Storage System Description [REP3-040] sets out that the maximum depth of piled foundations would be 12m. The trip generation calculations for the transport assessment will be updated based on discussions with SLD and WC once meeting notes have been agreed. This includes agreed concrete foundation depths of 0.8m for the BESS, and 400KV substation and 0.5m for the 132kv substations. A further meeting was held with WC on 19/08/26 where this was also agreed. The meeting minutes once agreed will be submitted to the examination and the trip generation calculations updated in the submitted reports.
WC-157	Transport and Access	Post Hearing Submission from Stop Lime Down	28.6. Table: Paragraph 2.1.22 Spoil: How the 139,666m ³ of excavated soil deemed unacceptable material would be dealt with or removed from off-site has been a past concern raised by Wiltshire Council. It is stated that: <i>"At the meeting it was stated that the assumption was that 10% of the 139,666m³ of excavated soil would be removed and that</i>	The trip generation calculations have been updated based on discussions with SLD and submitted at Deadline 5 in the Highways Technical Note in response to Appendix A of the SLD Deadline 4 Submission [REP5-107] and includes spoil calculations. A precautionary allowance for the off-site removal of up to 10% of excavated soils has

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			<i>there would be no backfilling of aggregate vehicles</i> ". This seems to conflict with a previous assertion that all spoil would remain within the site. AS SLD note, even a 10% off-site haul would require a considerable number of HGVs (Tippers) assuming these trips are separate, and aggregate lorries are not used to do this. It is not acceptable to include this in the 50% uplift for 'peak' daily movements. It will be an ongoing activity over the construction period so should inform the 'average' figure in the first instance.	been included within the Transport Assessment to represent a conservative worst-case scenario for traffic movements. The current design assumption is that all soils will be retained and managed on site, and no off-site soil removal within the Solar PV Sites is anticipated. However, the allowance has been included solely to ensure that the maximum potential transport effects are robustly assessed in the unlikely event that some soil export is required. Should off-site soil removal ultimately be required as part of the detailed design, the Applicant would need to confirm as part of the discharge of the relevant requirements whether there would be any materially new or materially different effects compared to those reported in ES Volume 1, Chapter 17: Soils and Agriculture [REP3-021] .
WC-158	Transport and Access	Post Hearing Submission from Stop Lime Down	28.7. Table: Paragraph 2.1.34 Chances of HGVs meeting on Fosse Way: It is stated that <i>"Following discussions between the transport experts, it was agreed that a figure of 2.3 HGVs meeting per hour is correct"</i> . It would be helpful for Wiltshire Council to see the supporting calculations referred to. It is noted that this	The probability formulae were agreed with SLD, however the passing places were not removed from the route length which resulted in an overestimation of the chances of two HGVs meeting on the less wide roads. The probability

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			is presumably based on the current overall HGV estimates, which remain a matter of disagreement. As such, this figure could rise. It is also clear that, despite the past assertion from the Applicant that the risk of two HGVs meeting is negligible, there is in fact a chance of it happening every 20 minutes or so in every hour.	calculations will be submitted in a technical note at Deadline 6b.
WC-159	Transport and Access	Post Hearing Submission from Stop Lime Down	28.8. Table: Paragraph 2.1.35 Chances of HGVs meeting on Road to Bradfield Cottages: The comments above equally apply and assumed figure of 1.7 HGVs meeting per hour.	The Applicant refers to its response to WC-158.
WC-160	Transport and Access	Post Hearing Submission from Stop Lime Down	Appendix A 28.9. The council's comments on the revised HGV Trip Generation Report in Appendix A are contained below. The SLD revised estimate of overall HGV movements associated with the Solar PV site during the construction phase is now 47,501, so lower than previous but still 82% higher than the Applicant's forecast of 26,086 movements in the same period.	The trip generation calculations have been updated based on discussions with SLD and submitted at Deadline 5 in the Highways Technical Note in response to Appendix A of the SLD Deadline 4 Submission [REP5-107] .

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
WC-161	Transport and Access	Post Hearing Submission from Stop Lime Down	Number of Solar Panels: The potential underestimate in the Applicant's figure used for PV Modules has been raised by the council already. The SLD assumption which draws on the EN-3 paragraph appears reasonable. Using even the lower density of 1,854 panels/ha gives 869,592 panels over the Applicant's stated area of panels (469ha). This is considerably greater than the PV number assumed now.	The Applicant refers the Council to its response to TT2.1 of The Applicant's Response to the Examining Authority's Second Written Questions [REP5-097] confirming the maximum number of panels to be considered as a reasonable worst case. Furthermore, applying a generic density of 1,854 panels/ha across the entire 469ha fenced area (as suggested by SLD) is not technically realistic, as it fails to account for necessary internal spatial constraints, including access tracks, ecological mitigation buffers, and topographical offsets where panels cannot be placed.
WC-162	Transport and Access	Post Hearing Submission from Stop Lime Down	Number of Solar Panels/HGV: SLD note that the use of a high load container only increases its volume by around 12%, so it is unclear how it is deduced by the Applicant that using these would lead to an increase in capacity of 44% (i.e. from 500 panels to 720 panels). The point is accepted, so more explanation by the Applicant is needed. However, it should not be assumed that all deliveries could be made	The Applicant confirms that the capacity of 720 modules per High Cube container, compared with 500 modules in a standard 40ft container, has been verified by the relevant manufacturer and suppliers in the Applicant's operational supply chain. While the internal volume of a High Cube container is approximately 12% greater, its additional height allows modules to be stacked more efficiently, increasing the number transported per container. This

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			using these if looking at a reasonable worst-case.	container capacity has been incorporated into the Applicant's Engineering, Procurement and Construction (EPC) modelling on other IGP schemes, and verified by operational contractors to accurately inform the assessment. The Applicant has updated the Outline CTMP [REP5-083] at Section 6.17 submitted at Deadline 5 to confirm the use of high cube containers.
WC-163	Transport and Access	Post Hearing Submission from Stop Lime Down	• Mounting Structures: Unless the Applicant can prove why the lower 43% figure is reasonable for Lime Down, so a much lower number of supporting structure HGV deliveries relative to those needed for panel deliveries, it would seem more reasonable to use the 73% figure forming the average ratio for Botley West, Green Hill and Heckington Fen.	The Applicant refers to Highways Technical Note in response to Appendix A of the SLD Deadline 4 Submission [REP5-107] Highway Technical Note submitted at Deadline 5 and maintains that the calculated number of HGV deliveries for mounting structures is based on verifiable logistical data and provides a consistent like-for-like comparison with other solar projects when adjusted for specific assessment methodologies. The specific ratio utilised in the updated assessments is derived from direct manufacturer and supplier data confirming that mounting structures for 0.9 to 1.1MW of 640W

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				solar panels can be transported on a single standard articulated flatbed vehicle. Utilising a baseline of 0.9MW per load to represent a reasonable worst-case scenario, the Applicant calculates a total of 599 HGV deliveries for mounting structures. This equates to approximately 51.2% of the deliveries required for the solar panels themselves, based on the high-density sensitivity scenario of 842,000 modules.
WC-164	Transport and Access	Post Hearing Submission from Stop Lime Down	General Access Tracks: The assumed construction depth of 0.3m has been previously accepted by Wiltshire Council. SLD apply a 5% uplift for potential widening on bends. This is not unreasonable but unlikely to have a big impact on the number of HGVs needed over the construction period.	The trip generation calculations have been updated based on discussions with SLD and submitted at deadline 5 in the Highways Technical Note in response to Appendix A of the SLD Deadline 4 Submission [REP5-107].
WC-165	Transport and Access	Post Hearing Submission from Stop Lime Down	Substation/BESS Access Tracks: It appears the length and width of these higher standard tracks is agreed, so the overall area. Similarly, the construction depth of 0.65m.	The trip generation calculations have been updated based on discussions with SLD and submitted at deadline 5 in the Highways Technical Note in response to Appendix A of the SLD Deadline 4 Submission [REP5-107].

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
WC-166	Transport and Access	Post Hearing Submission from Stop Lime Down	Compound Surfacing: It is stated "<i>The Applicant makes no separate assessment of the HGV movements associated with compound construction and removal. It has been assumed that each compound will be 50m x 60m (slightly larger than the 50m x 50m that has been suggested as the minimum size by the Applicant)</i>". The construction and removal of the Solar PV site compounds need to be considered as a bespoke item, and assumptions suggested by SLD do not seem unreasonable.	The trip generation calculations have been updated based on discussions with SLD and submitted at deadline 5 in the Highways Technical Note in response to Appendix A of the SLD Deadline 4 Submission [REP5-107].
WC-167	Transport and Access	Post Hearing Submission from Stop Lime Down	Spoil: SLD assumptions are based on the Applicant's assertion that 139,666m³ of soil would be excavated and that 10% of this would be taken off site. As stated already, the council view is that this part disposal of excavated waste off-site needs to be factored in directly, so not accounted for within the 50% peak day uplift.	The Applicant refers to Highways Technical Note in response to Appendix A of the SLD Deadline 4 Submission [REP5-107] submitted at Deadline 5 and notes ongoing discussions in the SoCG between Stop Lime Down and the Applicant. A precautionary allowance for the off-site removal of up to 10% of excavated soils has been included within the Transport Assessment to represent a conservative worst-case scenario for traffic movements. The current design assumption is that all soils will be

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				retained and managed on site, and no off-site soil removal within the Solar PV Sites is anticipated. However, the allowance has been included solely to ensure that the maximum potential transport effects are robustly assessed in the unlikely event that some soil export is required. Should off-site soil removal ultimately be required as part of the detailed design, the Applicant would need to confirm as part of the discharge of the relevant requirements whether there would be any materially new or materially different effects compared to those reported in ES Volume 1, Chapter 17: Soils and Agriculture [REP3-021] .
WC-168	Transport and Access	Post Hearing Submission from Stop Lime Down	132kV and 400kV Substation Foundations: It is noted that the agreed indicative foundation sizes of each of the 132kV substations is 3,455m², and the size of the 400kV substation base is 38,037m². The assumed 0.5m thickness of the 133kV substation bases appears reasonable. SLD assume that a mix of foundation depths will be needed under the heavier 400kV substations, so a typical 0.8m thickness over 75% of the site and a 0.3m thickness elsewhere. The council's Highways	The Applicant refers to Highways Technical Note in response to Appendix A of the SLD Deadline 4 Submission [REP5-107] submitted at Deadline 5 and notes ongoing discussions in the SoCG between Stop Lime Down and the Applicant.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			Development Management officer cannot comment on whether this is a reasonable split.	
WC-169	Transport and Access	Post Hearing Submission from Stop Lime Down	• BESS units: It is advised that <i>"The Applicant recognises that each BESS unit would be too large to be transported by a single standard HGV so there will need to be 2 deliveries associated with each BESS unit"</i> (270). This seems a reasonable assumption based on the Applicant's own information.	The Applicant refers to Highways Technical Note in response to Appendix A of the SLD Deadline 4 Submission [REP5-107] submitted at Deadline 5 which confirms that individual BESS units would require one delivery.
WC-170	Transport and Access	Post Hearing Submission from Stop Lime Down	• BESS Power Conversion System (PCS) units: It is stated: <i>"Appendix 3-1 to the ES [REP3-041] shows the proposed layout of the BESS. This includes 45 PCS units comprising 90 inverters and 45 medium voltage transformers (Appendix 3-1, para. 1.2.1 [REP3-041]). The Applicant has made no allowance for these components"</i>. It is a bit concerning that no HGV transport allowance has been made for this kit if true. The allowance thus included by SLD in their calculations does therefore not seem unreasonable.	The trip generation calculations have been updated based on discussions with SLD and submitted at deadline 5 in the Highways Technical Note in response to Appendix A of the SLD Deadline 4 Submission [REP5-107] .

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
WC-171	Transport and Access	Post Hearing Submission from Stop Lime Down	• BESS Foundations: It is advised based on the Applicant's own response that the indicative size of the BESS area is 27,096m². In addition, as noted by SLD, the BESS foundations (BESS units and PCS units) are expected to be concrete piles up to 12m in depth. Both would sit on concrete platforms that would be supported on these concrete piles. SLD calculations assume an average depth of concrete for BESS and PCS foundations of 0.8m, as opposed to a 0.3m depth assumed by the Applicant. It is assumed this is to make some allowance for the concrete volume in the piles under these bases. SLD further assume that, due to the need to contain fire water from the entire BESS area, an additional impermeable concrete structure will be needed, with this likely filled with gravel. They have duly assumed a 0.3m depth of concrete and 0.5m of gravel infill over areas not occupied by BESS and PCS platforms. The council's Highways Development Management officer is unable to comment on the need for the latter, but making due allowance for the piles	The Applicant confirms that the trip generation calculations provided in the Highways Technical Note in response to Appendix A of the SLD Deadline 4 Submission [REP5-107] have been updated to incorporate the more conservative parameters for BESS foundations suggested by Stop Lime Down and the Council. Specifically, the Applicant has adopted an average concrete depth of 0.8m for the BESS and PCS platforms to provide a documented allowance for the volume of concrete within the piles, which may extend to a maximum depth of 12m depending on localised ground conditions. Furthermore, the updated assessment includes provision for a further impermeable concrete structure (0.3m depth) and associated aggregate infill across the remaining portions of the 27,096m² BESS compound area to facilitate the secured sealed and isolatable firewater containment system. These refined assumptions ensure that the transport assessment maintains a reasonable worst-case scenario.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			under the platforms seems reasonable to the council.	
WC-172	Human Health	Post Hearing Submission from Stop Lime Down	Section 3.8 Human Health 28.10. Please see the council's comments to HW1.1 to HW1.3 on REV4-081 above, which equally apply in relation to SLD's response.	The Applicant refers to its responses to WC-99 to WC-103.
WC-173	Socio-Economic, Tourism and Recreation	Post Hearing Submission from Whatley Manor	29. Post Hearing Submission from Whatley Manor [REP4-134] 29.1. Wiltshire Council would concur with the issues raised in this document and submit that a comprehensive compensation scheme as proposed would allay most of the concerns. This is relevant for a number of other businesses that have raised similar issues in Deadline 4 submissions.	The Applicant notes this comment and refers to Technical Note on Impacts to Non-Equine Businesses [REP5-111] submitted at Deadline 5.
WC-174	Description and DCO Process Hydrology, Flood	Lead Local Flood Authority Deadline 5 Update	30. Lead Local Flood Authority Deadline 5 Update 30.1. The Lead Local Flood Authority (LLFA) submissions at Deadline 5 relate to hydrology, flood risk, drainage and associated water	The Applicant notes the LLFA's Deadline 5 update and the matters identified for consideration.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
	Risk and Drainage		environment matters for the Lime Down Solar Park project.	
WC-175	Description and DCO Process Hydrology, Flood Risk and Drainage	Lead Local Flood Authority Deadline 5 Update	30.2. Wiltshire Council acknowledges the substantial volume of additional technical information submitted by the Applicant during Examination, including revisions to the Environmental Statement, Flood Risk Assessment and Drainage Strategy, management plans, Draft Development Consent Order documentation, responses to representations and updated Statements of Common Ground.	The Applicant welcomes Wiltshire Council's acknowledgement of the substantial additional technical information and document revisions submitted during the Examination.
WC-176	Hydrology, Flood Risk and Drainage	Lead Local Flood Authority Deadline 5 Update	30.3. The LLFA has reviewed the additional information and notes that a number of matters have been substantially narrowed through ongoing engagement. In particular, the LLFA is no longer seeking additional scheme-wide hydraulic modelling of solar panel areas and recognises the further explanation provided by the Applicant regarding assessment methodology and runoff management assumptions.	The Applicant welcomes the LLFA's confirmation that the matters in dispute have substantially narrowed, including its confirmation that no additional scheme-wide hydraulic modelling of the Solar PV Panelled Areas is sought. The Applicant considers that this reflects the proportionate assessment approach adopted throughout the Examination, comprising detailed hydraulic modelling where warranted by the nature and sensitivity of the flood risk, including at Lime Down D and Lime Down E2,

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				together with proportionate assessment of smaller Ordinary Watercourses and drainage features.
WC-177	Hydrology, Flood Risk and Drainage	Lead Local Flood Authority Deadline 5 Update	30.4. The LLFA's remaining concerns principally relate to how the measures relied upon by the assessment will be secured, implemented, monitored, maintained and governed throughout the lifetime of the Scheme. Key areas of ongoing discussion include the linkage between SuDS measures and SFRA objectives, residual performance and assurance arrangements, groundwater monitoring, operational management of buffers and runoff controls, and opportunities for natural flood management and wider flood risk betterment.	The Applicant notes that the remaining matters identified by the LLFA principally concern implementation, monitoring, maintenance and governance rather than the adequacy of the underlying flood risk and drainage assessment. The overarching construction-phase monitoring, governance, intervention and corrective-action framework is addressed comprehensively in the Applicant's response to DCO2.1y above. The corresponding operational framework is addressed in DCO2.1ae and is not repeated here. The relationship between the hydrology mitigation relied upon, the relevant management plans, associated monitoring requirements and the mechanisms by which each measure is secured is consolidated within Table 3-5: Hydrology, Flood Risk and Drainage of the Mitigation Route Map [REP5-102].

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				The specific matters concerning natural flood management and wider downstream betterment have also been considered through the Lime Down D - Natural Flood Management Viability Report [REP5-109] , which provides a site-specific assessment of the opportunities available within the Scheme boundary.
WC-178	Hydrology, Flood Risk and Drainage	Lead Local Flood Authority Deadline 5 Update	30.5. This response covers: • a response to the Applicant's Hydraulic Modelling Report; • an updated LLFA position statement and SoCG update covering Topics 3.7.1 to 3.7.17; and • a focused review of the revised Draft DCO, Explanatory Memorandum and Schedule of Changes from an LLFA perspective.	The Applicant notes the scope of the LLFA's Deadline 5 submission. The individual technical matters raised within those submissions are addressed in the relevant responses elsewhere in this document.
WC-179	Description and DCO Process	Lead Local Flood Authority	30.6. The LLFA remains committed to constructive engagement with the Applicant and considers that the principal outstanding matters are capable of further refinement through the	The Applicant welcomes the LLFA's continued constructive engagement and its confirmation that the remaining matters are capable of further refinement through the Statement of Common Ground process.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
	Hydrology, Flood Risk and Drainage	Deadline 5 Update	ongoing Statement of Common Ground process.	The Applicant has continued that engagement following Deadline 5 and has updated the Statement of Common Ground with Wiltshire Council [EN010168/EXAM/8.2] (Revision 4) accordingly.
WC-180	Description and DCO Process Hydrology, Flood Risk and Drainage	LLFA Response to Applicant Response on Hydraulic Modelling Requirements	LLFA Response to Applicant Response on Hydraulic Modelling Requirements 30.7. This section sets out the LLFA Response to the Applicant's document 'Applicant's Response to Wiltshire Council Lead Local Authority Note on Hydraulic Modelling Requirements' dated 30 April 2026. 30.8. Following review of the Applicant's submissions and subsequent examination documents, the LLFA acknowledges the additional clarification provided regarding assessment methodology, policy interpretation and the distinction between impermeable infrastructure and vegetated solar PV areas. 30.9. The LLFA is no longer seeking additional scheme-wide hydraulic modelling of solar panel areas. The principal	The Applicant welcomes the LLFA's acknowledgement of the additional clarification provided regarding the assessment methodology and the distinction between positively drained infrastructure and the predominantly vegetated and permeable Solar PV Panelled Areas. The Applicant also welcomes the LLFA's confirmation that it is no longer seeking additional scheme-wide hydraulic modelling of the Solar PV Panelled Areas. This represents a significant narrowing of the matters previously in discussion. The remaining matters identified by the LLFA concern the implementation and assurance framework rather than a need for further scheme-wide hydraulic assessment. Those matters are addressed through the responses

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			issue has evolved from assessment methodology towards implementation, monitoring, maintenance and governance of the measures relied upon to support the conclusions of the Flood Risk Assessment and Drainage Strategy.	to DCO2.1y and DCO2.1ae above and through Table 3-5 of the Mitigation Route Map [REP5-102] .
WC-181	Hydrology, Flood Risk and Drainage	LLFA Response to Applicant Response on Hydraulic Modelling Requirements	30.10. The Applicant states that runoff performance is dependent on management-led controls including soil condition, vegetation establishment, flow connectivity, permeable track design, riparian management and post-construction remediation. The LLFA agrees that these factors are important determinants of runoff behaviour. The remaining question is how these assumptions will be secured, verified and maintained throughout the lifetime of the Scheme.	The Applicant agrees that soil condition, vegetation establishment, flow connectivity, permeable access-track design and the maintenance of drainage pathways are relevant to runoff behaviour. The arrangements by which these measures are implemented, monitored and maintained are addressed comprehensively in the Applicant's responses to DCO2.1y and DCO2.1ae above and are not repeated here. The relationship between these individual controls and the flood risk and drainage conclusions is consolidated within Table 3-5: Hydrology, Flood Risk and Drainage of the Mitigation Route Map [REP5-102].
WC-182	Hydrology, Flood	LLFA Response	30.11. In particular, the LLFA seeks confidence that the management measures referenced	The Applicant agrees that the relevant management measures should operate within a

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
	Risk and Drainage	to Applicant Response on Hydraulic Modelling Requirements	throughout the CEMP, SRMP, LEMP and OEMP are translated into a clear implementation framework. This should include defined responsibilities, inspection arrangements, monitoring requirements, maintenance procedures, reporting mechanisms and corrective actions where performance differs from that assumed in the assessment.	clear implementation and assurance framework. That framework is addressed comprehensively in DCO2.1y for construction and DCO2.1ae for operation, including responsibilities, inspections, monitoring, records, reporting, intervention and corrective action, and is not repeated here. The Outline CEMP [REP5-071], Outline OEMP [REP5-073], Outline SRMP [REP5-077] and relevant landscape and ecological management measures provide the phase and subject-specific controls, while Table 3-5 of the Mitigation Route Map [REP5-102] provides the consolidated audit trail demonstrating how those controls collectively support the hydrology, flood risk and drainage outcomes relied upon by the assessment.
WC-183	Hydrology, Flood Risk and Drainage	LLFA Response to Applicant Response on	30.12. For soil management, examples may include evidence of post-construction soil remediation, management of compaction risks, restoration standards and ongoing review of soil condition. For vegetation management, examples may include establishment criteria,	The Outline SRMP [REP5-077] includes under Monitoring Procedures continuous live monitoring of ground and weather conditions to inform handling and machinery selection to minimise the risks of compaction, inspections to identify compaction, and ongoing visual

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
	Soils and Agriculture	Hydraulic Modelling Requirements	maintenance requirements, remedial actions and monitoring of areas relied upon to manage runoff and water quality.	monitoring throughout the operation and maintenance phase, with issues to be addressed when ground conditions are next suitable. The Applicant notes the LLFA's examples regarding soil and vegetation management. The Outline SRMP [REP5-077] already provides for monitoring of soil condition, identification of compaction and remedial action where deterioration is identified. Soil protection and monitoring are secured through Requirement 18 of Schedule 2 of the dDCO, together with the relevant phase-specific management plans. The Commitments Register [REP1-114] likewise records monitoring for compaction, waterlogging and vegetation deterioration and associated remedial action. The corresponding vegetation and runoff-related monitoring arrangements are addressed in the Applicant's response to DCO2.1ae above and are not repeated here.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
WC-184	Hydrology, Flood Risk and Drainage	LLFA Response to Applicant Response on Hydraulic Modelling Requirements	30.13. For surface water and water quality management, the LLFA considers that confidence would be enhanced through clear performance indicators, trigger thresholds, investigation procedures and escalation routes. Such arrangements would demonstrate how residual flood risk and water quality effects will continue to remain negligible to low throughout construction and operation.	The Applicant has substantively addressed the monitoring, intervention, reporting, corrective-action and escalation framework in its responses to DCO2.1y and DCO2.1ae above and does not repeat those arrangements here. The Applicant considers that performance indicators should be appropriate to the measure being monitored rather than imposed as common numerical thresholds across all drainage, soil and vegetation controls. The detailed CEMP and OEMP provide the mechanisms for monitoring effectiveness, recording deviations, taking corrective action and reviewing controls where necessary.
WC-185	Hydrology, Flood Risk and Drainage	LLFA Response to Applicant Response on Hydraulic Modelling Requirements	30.14. The LLFA also remains interested in understanding how opportunities for riparian enhancement, natural flood management and wider catchment-scale flood risk betterment have been considered. The LLFA is not seeking additional hydraulic modelling to support the baseline assessment, but would welcome proportionate evidence demonstrating consideration of potential enhancement opportunities and the	The Applicant welcomes the LLFA's confirmation that it is not seeking additional hydraulic modelling and that its remaining interest concerns proportionate consideration of riparian enhancement, natural flood management and wider flood-risk betterment. The Applicant has now undertaken a specific assessment of Natural Flood Management opportunities at Lime Down D, reported in the Lime Down D - Natural Flood Management

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			reasons why measures have or have not been adopted.	Viability Report [REP5-109]. The assessment considered both non-structural measures, including soil management and riparian buffers, and more substantial storage interventions. The assessment demonstrates that measures within Lime Down D would provide only localised benefits and would not materially reduce downstream flood risk at Corston. In particular, Lime Down D represents less than 8% of the upstream catchment and the principal flood-risk mechanism at Corston is the local conveyance constraint associated with the A429 crossing rather than insufficient storage within Lime Down D. The Applicant therefore considers that the opportunities sought by the LLFA have now been proportionately assessed and that the reasons for adopting, or not adopting, additional NFM measures are clearly evidenced.
WC-186	Description and DCO Process	LLFA Response to Applicant Response	30.15. The LLFA welcomes the Applicant's commitment to continued engagement and considers that the principal matters in dispute have narrowed substantially. Remaining matters are reflected within the LLFA's updated	The Applicant welcomes the LLFA's acknowledgement that the principal matters in dispute have narrowed substantially and that the remaining focus concerns securing,

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
		on Hydraulic Modelling Requirements	Statement of Common Ground positions and primarily relate to securing, implementing, monitoring and maintaining the measures relied upon by the assessment rather than the assessment methodology itself.	implementation, monitoring and maintenance rather than the assessment methodology itself. Those remaining matters are addressed through the Applicant's responses to DCO2.1y and DCO2.1ae above and through the Mitigation Route Map [REP5-102] , which provides the consolidated audit trail between the mitigation relied upon, associated monitoring requirements and the mechanisms by which those measures are secured.
WC-187	Hydrology, Flood Risk and Drainage	LLFA Response to Applicant Response on Hydraulic Modelling Requirements	30.16. In conclusion, the LLFA acknowledges the Applicant's response and no longer seeks additional scheme-wide hydraulic modelling. The remaining focus is on demonstrating that the assumptions and management measures relied upon within the flood risk, drainage, water quality and runoff assessments are appropriately secured and supported by robust implementation, monitoring, maintenance and governance arrangements throughout the lifecycle of the Scheme.	The Applicant welcomes the LLFA's confirmation that it no longer seeks additional scheme-wide hydraulic modelling. The matters regarding implementation, monitoring, maintenance and governance are substantively addressed in the Applicant's responses to DCO2.1y and DCO2.1ae above and are not repeated here. The Applicant considers that, together with the Mitigation Route Map [REP5-102] , the secured management framework provides the assurance necessary to maintain the flood risk, drainage, water quality and runoff outcomes

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				relied upon by the assessment throughout the lifetime of the Scheme.
WC-188	Hydrology, Flood Risk and Drainage	LLFA Position Statement	LLFA Position Statement Legislation and Policy 30.17. 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 SFRA and relevant LLFA guidance. The LLFA's remaining concern relates to implementation rather than policy identification. The Applicant has not yet fully demonstrated how the measures relied upon to achieve compliance with these requirements will be consistently secured, implemented, monitored and maintained throughout the lifetime of the Scheme. The LLFA therefore seeks further confidence that appropriate governance, monitoring, maintenance and assurance mechanisms are embedded within the management framework.	The Applicant welcomes the LLFA's acknowledgement that the relevant legislative and policy framework has been identified. The remaining implementation, monitoring, maintenance and governance matters are substantively addressed in the Applicant's responses to DCO2.1y and DCO2.1ae above and are not repeated here. The relationship between the relevant hydrology mitigation, management plans, monitoring requirements and securing mechanisms is consolidated within Table 3-5: Hydrology, Flood Risk and Drainage of the Mitigation Route Map [REP5-102].

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
WC-189	Hydrology, Flood Risk and Drainage	LLFA Position Statement	30.18. The Applicant is asked to demonstrate how compliance with flood risk, drainage, water resources and SFRA objectives will be secured through the Scheme's management, monitoring, maintenance and governance framework. Examples may include clear responsibilities, inspection schedules, reporting procedures and escalation processes where management measures are not performing as intended.	The Applicant has substantively addressed the governance, responsibilities, inspection, monitoring, reporting, escalation and corrective-action framework in its responses to DCO2.1y and DCO2.1ae above and does not repeat those arrangements here. The Mitigation Route Map [REP5-102], in particular Table 3-5, provides the consolidated audit trail demonstrating how the measures relied upon to meet the Scheme's flood risk, drainage and water environment objectives are secured and monitored.
WC-190	Hydrology, Flood Risk and Drainage	LLFA Position Statement	SuDS and SFRA Linkage 30.19. The LLFA accepts that the Scheme relies upon a combination of formal drainage infrastructure and non-structural SuDS measures. The remaining issue is demonstrating how these measures contribute to Wiltshire SFRA objectives, Wiltshire LLFA SuDS guidance and greenfield runoff principles, and how their delivery is secured through the management framework.	The Applicant welcomes the LLFA's acceptance that the Scheme relies on a combination of formal drainage infrastructure and wider land-management measures. The formal drainage principles, including control of runoff from positively drained areas, attenuation and maintenance requirements, are established within the Flood Risk Assessment and Drainage Strategy suite [REP5-047 to REP5-060].

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				The wider measures relied upon to support runoff management include retention and management of vegetated ground cover, protection of soil structure, maintenance of existing drainage pathways and watercourse buffers. Their relationship to the Scheme's flood risk and drainage objectives, together with their monitoring and securing mechanisms, is identified within Table 3-5 of the Mitigation Route Map [REP5-102]. The Applicant therefore considers that the linkage between the drainage strategy, wider SuDS principles and the secured management framework is clear.
WC-191	Hydrology, Flood Risk and Drainage	LLFA Position Statement	30.20. The Applicant is asked to demonstrate which non-structural SuDS measures, such as vegetation management, soil management, riparian buffers, infiltration opportunities and run-off attenuation measures are relied upon by the Scheme. The Applicant is asked to explain which SFRA or SuDS objectives each measure supports, where it is secured within the	The Applicant has substantively addressed the relationship between formal drainage infrastructure, vegetation, soil management, watercourse buffers and the wider management framework in response to WC-186 above and does not repeat that explanation here. The relevant measures, their purpose, monitoring requirements and securing mechanisms are consolidated within Table 3-5:

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			management framework and how performance will be maintained over the Scheme lifetime.	Hydrology, Flood Risk and Drainage of the Mitigation Route Map [REP5-102] . The Applicant therefore considers that the role of these measures in supporting runoff management, erosion control and flood risk objectives is clearly identified without duplicating the same requirements across each individual management plan.
WC-192	Hydrology, Flood Risk and Drainage	LLFA Position Statement	Assessment Methodology 30.21. The LLFA broadly accepts the assessment methodology and is no longer seeking additional scheme-wide hydraulic modelling. However, confidence in the assessment outcomes depends on the effective implementation and long-term maintenance of the soil, vegetation and land-management measures relied upon by the assessment.	The Applicant welcomes the LLFA's broad acceptance of the assessment methodology and confirmation that no additional scheme-wide hydraulic modelling is sought. The remaining matters concerning implementation and long-term maintenance of soils, vegetation and land-management measures are addressed through the relevant secured management plans and the Applicant's responses to DCO2.1ae and WC-189 below.
WC-193	Hydrology, Flood Risk and Drainage	LLFA Position Statement	30.22. The Applicant is asked to demonstrate how the soil, vegetation and land-management assumptions relied upon by the assessment are secured, monitored and maintained throughout the lifetime of the	The Applicant agrees that soil, vegetation and land-management measures relied upon by the assessment should be translated into practical management controls.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
	Soils and Agriculture		Scheme. The LLFA is specifically looking for how the assumptions relating to soil condition, vegetation establishment, land management and runoff behaviour are translated into practical management requirements. Examples may include soil restoration procedures, grazing management, vegetation maintenance plans and inspection regimes.	For soils, the Outline SRMP [REP5-077] provides the framework for avoiding compaction, monitoring soil condition, identifying deterioration and undertaking remedial action where required. These controls are secured through Requirement 18 of Schedule 2 of the Draft DCO [REP5-012], together with the relevant construction, operational and decommissioning management plans. The Commitments Register [REP1-114] records the associated monitoring for compaction, waterlogging and vegetation deterioration and the requirement for remedial action where these are identified. For vegetation, the relevant landscape and operational management measures provide for establishment, maintenance and monitoring of vegetated areas. The hydrological indicators relevant to runoff and erosion, including sparse or bare ground, vegetation decline, drip-line erosion, rilling and channelisation, are addressed in the Applicant's response to DCO2.1ae above and are not repeated here.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				The Applicant therefore considers that the assumptions relied upon by the assessment are translated into identifiable and secured management requirements. The soil protection measures set out in the Outline SRMP [REP5-077] are secured by Requirement 17 of Schedule 2 of the Draft DCO [REP5-012]. The Outline SRMP [REP5-077] includes measures to monitor soil condition throughout the construction, operation and decommissioning phases.
WC-194	Hydrology, Flood Risk and Drainage	LLFA Position Statement	Cumulative Assessment and Temporary Works 30.23. The LLFA is not seeking further quantitative modelling of temporary construction conditions. The remaining issue relates to confidence that construction-phase flood risk and runoff controls will be implemented, monitored, maintained and adapted where necessary throughout the construction period.	The Applicant welcomes the LLFA's confirmation that it is not seeking further quantitative modelling of temporary construction conditions. The remaining matters concerning implementation, monitoring, maintenance and adaptation of construction-phase drainage and runoff controls are addressed comprehensively in the Applicant's response to DCO2.1y above and are not repeated here.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
WC-195	Hydrology, Flood Risk and Drainage	LLFA Position Statement	30.24. The Applicant is asked to demonstrate how temporary drainage, sediment control, inspection, maintenance and corrective-action procedures will be implemented and monitored throughout construction. The LLFA is specifically seeking confidence that construction controls will be implemented and remain effective throughout the works. Examples may include temporary drainage details, sediment controls, inspection frequencies, maintenance procedures, corrective actions following storm events and responsibilities for implementation.	The Applicant has substantively addressed the temporary drainage, sediment-control, inspection, maintenance, reporting and corrective-action arrangements in its response to DCO2.1y above. That response explains how the detailed Water Management Plan will translate the secured Outline CEMP [EN010168/APP/7.12] (Revision 7) controls into site and phase-specific arrangements, including temporary drainage, runoff and sediment controls, exceedance routing, inspection frequencies, monitoring parameters, intervention criteria, responsibilities, reporting and corrective action. The Applicant therefore considers that the construction-phase assurance sought by the LLFA is already provided through the secured CEMP and Water Management Plan framework.
WC-196	Hydrology, Flood Risk and Drainage	LLFA Position Statement	Residual Effects 30.25. The LLFA broadly accepts the Applicant's residual effects assessment. However, confidence in the residual flood risk	The Applicant welcomes the LLFA's broad acceptance of the residual effects assessment. The remaining matters identified by the LLFA concern the continued implementation and

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			and water quality conclusions is dependent upon the successful implementation, monitoring and long-term maintenance of the runoff-management, soil-management, vegetation-management and pollution-control measures relied upon by the Scheme.	performance of the secured mitigation rather than the conclusions of the assessment itself. The construction-phase monitoring and assurance framework is addressed comprehensively in the Applicant's response to DCO2.1y above, with the corresponding operational arrangements addressed in DCO2.1ae. The Applicant therefore considers that the runoff-management, soil-management, vegetation-management and pollution-control measures relied upon by the assessment are supported by appropriate implementation, monitoring, maintenance and corrective-action arrangements throughout the relevant phases of the Scheme.
WC-197	Hydrology, Flood Risk and Drainage	LLFA Position Statement	30.26. The Applicant is asked to provide a monitoring and assurance framework that demonstrates how residual flood risk and water quality effects will be monitored, reported and managed throughout the lifetime of the Scheme, including performance indicators, intervention thresholds, monitoring locations, reporting arrangements, responsibilities,	The Applicant has substantively addressed the monitoring and assurance framework requested by the LLFA in its responses to DCO2.1y and DCO2.1ae above and does not repeat those arrangements here. Those responses address responsibilities, monitoring and inspections, performance indicators appropriate to the measure being

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			corrective actions and governance arrangements.	monitored, intervention and investigation, reporting, corrective action and management review. The relationship between these controls and the residual flood risk and water quality mitigation relied upon by the assessment is consolidated within Table 3-5: Hydrology, Flood Risk and Drainage of the Mitigation Route Map [REP5-012] .
WC-198	Hydrology, Flood Risk and Drainage	LLFA Position Statement	Watercourse Easements 30.27. The LLFA accepts the principle of watercourse buffers, drainage corridors and maintenance access provisions adjacent to watercourses. The remaining issue relates to demonstrating how these corridors will be protected, maintained and kept available for inspection, maintenance access and long-term watercourse management throughout the lifetime of the Scheme.	The Applicant welcomes the LLFA's acceptance of the principle of watercourse buffers, drainage corridors and maintenance access provisions. The Scheme provides development-free buffers to watercourses, with wider stand-offs applied where required by site-specific ecological or other sensitivities. The purpose of these buffers is to protect watercourse function, maintain separation from Scheme infrastructure and retain appropriate access for inspection and maintenance. The detailed operational monitoring and maintenance framework is addressed in DCO2.1ae above and is not repeated here. The Applicant considers that the secured design and management framework provides for the

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				long-term protection and management of these corridors.
WC-199	Hydrology, Flood Risk and Drainage	LLFA Position Statement	30.28. The Applicant is asked to demonstrate how watercourse buffers, maintenance access routes and drainage corridors will be protected, managed and maintained, including arrangements for inspection, maintenance access, vegetation management and long-term watercourse function. Examples may include protection measures, access arrangements, vegetation management, inspection schedules and restrictions on activities that could compromise watercourse maintenance.	The Applicant has substantively addressed the protection and management of watercourse buffers and drainage corridors in its response to WC-194 above and does not repeat that position here. For operational purposes, watercourse corridors will remain free from permanent development except where an authorised crossing or other specific interaction is required. Vegetation within these areas will be managed in accordance with the relevant landscape and ecological requirements while maintaining the function of the watercourse and reasonable access required for inspection and maintenance. The associated monitoring, management and corrective-action framework is addressed in DCO2.1ae above.
WC-200	Hydrology, Flood	LLFA Position Statement	HDD Commitments 30.29. The LLFA broadly supports the proposed use of HDD at sensitive crossings. The	The Applicant welcomes the LLFA's broad support for the use of HDD and other trenchless techniques at sensitive crossings.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
	Risk and Drainage		remaining issue relates to demonstrating how crossing methodologies will be selected and how hydrological, hydrogeological and water environment risks will be assessed and managed on a site-specific basis.	The criteria for selecting crossing methodologies and the associated hydrological, hydrogeological and water-environment controls are addressed substantively in the Applicant's response to FHW2.6d above and are not repeated here. In summary, trenchless techniques are prioritised at Main Rivers and other sensitive locations where avoiding direct disturbance is appropriate, while alternative crossing techniques may be used at less sensitive features where site-specific assessment demonstrates that they can be undertaken without material effects on flood risk or the water environment.
WC-201	Hydrology, Flood Risk and Drainage	LLFA Position Statement	30.30. The Applicant is asked to demonstrate the criteria for selecting HDD and alternative crossing methodologies, and how hydrological, hydrogeological and water environment risks will be assessed, managed and monitored at sensitive crossings. Examples may include sensitivity criteria, hydrogeological considerations, watercourse characteristics, pollution	The Applicant has substantively addressed the selection of crossing methodologies and the assessment of site-specific crossing risks in its response to FHW2.6d above and does not repeat that explanation here. The final methodology will take account of watercourse sensitivity, channel and bank characteristics, flood risk, groundwater conditions, ecological receptors, engineering

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			prevention measures and how site-specific risks influence methodology selection.	constraints and pollution risk. Where HDD or another trenchless technique is selected, the detailed methodology will include the relevant drilling-fluid controls, breakout contingency arrangements, pollution prevention measures and, where required, proportionate hydrogeological assessment and monitoring.
WC-202	Hydrology, Flood Risk and Drainage	LLFA Position Statement	Draft DCO – HDD Approval 30.31. The LLFA 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 relates to demonstrating how sensitive crossings will be identified, assessed, reviewed and approved within that framework.	The Applicant welcomes the LLFA's acknowledgement that the DCO and management-plan framework provides the appropriate basis for controlling HDD and other watercourse crossing methodologies. Sensitive crossings and the indicative crossing approach are identified through the Watercourse Crossing Schedule [REP3-122] and associated mapping [REP3-139]. The remaining detailed design and construction controls are addressed through the detailed CEMP, crossing-specific method statements and the relevant drainage authority or Environment Agency approval mechanisms where applicable. The substantive approval and control framework is addressed in the Applicant's

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				response to FHW2.6d above and is not repeated here.
WC-203	Hydrology, Flood Risk and Drainage	LLFA Position Statement	30.32. The Applicant is asked to demonstrate how HDD designs, crossing risk assessments, construction methodologies and mitigation measures for sensitive crossings will be reviewed and approved through the DCO and associated management-plan framework. The LLFA is particularly interested in how sensitive crossings will pass through review and approval procedures. Examples may include risk assessments, method statements, technical approvals, mitigation proposals and the process for addressing concerns identified during review.	The Applicant has substantively addressed the review and approval framework for sensitive watercourse crossings in its response to WC-198 and FHW2.6d above. The detailed crossing design will be supported by the level of site-specific assessment appropriate to the sensitivity of the crossing and will identify the proposed methodology, relevant risks and required mitigation. These matters will be incorporated into the detailed CEMP and associated method statements and will be subject to the applicable DCO, drainage authority and environmental permitting controls. The Applicant therefore considers that the framework provides an appropriate mechanism for identifying and resolving site-specific concerns before the relevant works are undertaken.
WC-204	Hydrology, Flood	LLFA Position Statement	Draft DCO – GIS Mapping 30.33. The LLFA accepts that sufficient flood risk, drainage and water environment mapping	The Applicant welcomes the LLFA's confirmation that sufficient flood risk, drainage

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
	Risk and Drainage		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 and utilised during detailed design, implementation and long-term management of the Scheme.	and water-environment mapping has been provided for the purposes of the Examination. The spatial information required to implement the final design, and management measures will necessarily develop as the detailed design is confirmed. Relevant drainage assets, watercourses, buffers, drainage features and monitoring or maintenance locations will be recorded within the detailed design and management documentation applicable to the relevant phase. The Applicant does not consider that a separate GIS management requirement is necessary. The relevant information will form part of the controlled project records required to support implementation, inspection and maintenance.
WC-205	Hydrology, Flood Risk and Drainage	LLFA Position Statement	30.34. The Applicant is asked to clarify the availability, content and intended use of GIS-based information to support detailed design, asset management, inspection, maintenance and future management activities throughout the lifetime of the Scheme. Examples may include mapping of drainage assets, buffers, inspection	The Applicant has substantively addressed the role of spatial information in its response to WC-200 above. GIS or equivalent spatial records may be used as an implementation and asset-management tool where appropriate, including to record the final location of drainage infrastructure,

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			points, monitoring locations, maintenance records and future operational management activities.	watercourse buffers, inspection and maintenance features and other relevant environmental controls. The precise format of those records is appropriately determined at detailed design and does not need to be prescribed through the DCO. Where reasonably required to support the LLFA's review of detailed drainage proposals, relevant spatial information can be provided as part of the detailed design approval process.
WC-206	Hydrology, Flood Risk and Drainage	LLFA Position Statement	Draft DCO – SuDS Guidance 30.35. The LLFA 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 relied upon by the Scheme are translated into practical management, monitoring, maintenance and operational procedures throughout the lifetime of the Scheme.	The Applicant welcomes the LLFA's broad acceptance of the Scheme's runoff-management approach and its use of formal drainage infrastructure alongside wider land-management measures. The role of those measures and their relationship with the drainage strategy is addressed in the Applicant's responses to WC-186 and WC-187 above and is not repeated here. Operational monitoring and intervention arrangements are addressed in DCO2.1ae. The relevant measures, monitoring requirements and securing mechanisms are

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				also consolidated within Table 3-5: Hydrology, Flood Risk and Drainage of the Mitigation Route Map [REP5-012] .
WC-207	Hydrology, Flood Risk and Drainage	LLFA Position Statement	30.36. The Applicant is asked to demonstrate how the SuDS principles relied upon by the Scheme are secured through the management framework and supported by appropriate monitoring, maintenance, inspection and review arrangements throughout the lifetime of the Scheme. The LLFA is particularly interested in how the SuDS principles will be translated into operational procedures. Examples may include maintenance requirements, inspection schedules, vegetation management, runoff management measures and periodic performance reviews.	The Applicant has substantively addressed the translation of the Scheme's SuDS and runoff-management principles into the operational management framework in its responses to WC-186, WC-187 and DCO2.1ae above and does not repeat those arrangements here. Formal drainage infrastructure will be subject to the inspection and maintenance requirements established through the relevant approved drainage strategy, while the condition of soils, vegetation and other wider runoff-management measures is addressed through the relevant specialist management plans. The Applicant therefore considers that the Scheme provides an appropriate lifecycle framework for inspection, maintenance, monitoring, review and corrective action, with the relationship between those controls consolidated through the Mitigation Route Map [REP5-012].

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
WC-208	Hydrology, Flood Risk and Drainage	LLFA Position Statement	Floodplain Compensation 30.37. The LLFA acknowledges and accepts the additional explanation and supporting calculations provided in relation to floodplain compensation. The remaining matter relates to ensuring that the agreed assumptions, calculations and supporting justification are retained and reflected within the final Flood Risk Assessment documentation.	The Applicant welcomes the LLFA's acceptance of the additional explanation and supporting calculations relating to floodplain compensation. The relevant assumptions, calculations and justification have been incorporated within the Flood Risk Assessment and Drainage Strategy suite [REP5-047 to REP5-060] updated at Deadline 5, including the site-specific assessments for Lime Down D and Lime Down E2. The Applicant therefore considers that the technical basis accepted by the LLFA is retained within the final assessment documentation.
WC-209	Hydrology, Flood Risk and Drainage	LLFA Position Statement	30.38. The Applicant is asked to confirm that the supporting calculations, assumptions and explanatory text relating to floodplain compensation are retained within the final Flood Risk Assessment documentation. The LLFA wishes to clarify that no substantial additional evidence is sought beyond consistency checking.	The Applicant confirms that the supporting calculations, assumptions and explanatory text relating to floodplain compensation are retained within the relevant updated Flood Risk Assessment and Drainage Strategies [REP5-047 to REP5-060]. The Applicant welcomes the LLFA's confirmation that no substantive additional evidence is sought and agrees that the remaining exercise is one of consistency

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				checking. No further technical assessment is therefore considered necessary.
WC-210	Hydrology, Flood Risk and Drainage	LLFA Position Statement	Draft DCO – SPZ Monitoring 30.39. The LLFA broadly accepts the groundwater protection and pollution-control measures proposed for Source Protection Zones. The remaining issue relates to demonstrating when groundwater monitoring will be required, how potential impacts will be identified, and what response measures will be implemented should adverse effects be detected.	Ground investigation has been secured via the Outline CEMP [REP5-071] and this ground investigation will be used to define subsequent groundwater monitoring activities. Groundwater monitoring will be undertaken across the entire extent of the scheme and the monitoring regime will be designed to ensure protection of sensitive groundwater resources is maintained throughout the life of the scheme.
WC-211	Hydrology, Flood Risk and Drainage	LLFA Position Statement	30.40. The Applicant is asked to clarify the criteria and triggers for groundwater monitoring within Source Protection Zones, including monitoring requirements, reporting arrangements, intervention thresholds and corrective-action procedures where impacts are identified. The LLFA is specifically seeking clarification on when groundwater monitoring will be required and what actions would follow if impacts are identified. Examples may include trigger criteria, sampling frequencies, reporting	The criteria associated with groundwater monitoring has yet to be formally defined, but a monitoring programme will be designed in line with best practice considering the Environment Agency guidance resource Groundwater protection technical guidance - GOV.UK and the Wiltshire Council document Wiltshire Council Drainage Policy – Groundwater Monitoring . A baseline of groundwater conditions will be obtained prior to the commencement of construction, with a programme of regular monitoring events then

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			requirements, intervention thresholds and corrective action processes.	secured considering the sensitivity of specific locations, seasonality and hydrogeology. Intervention will be driven by observed variation in the baseline. Any variation will be rationalised against seasonal and hydrogeological conditions and where variation is identified, interventions will be designed. The Applicant outlines measures that will applied to mitigate potential impacts in the Outline CEMP [REP5-083]. At Deadline 5 the Applicant also updated the Draft DCO [REP5-012] to include the LLFA as a consultee for Requirement 11. This will ensure that the LLFA has input on the detailed drainage strategy for the Scheme.
WC-213	Hydrology, Flood Risk and Drainage	LLFA Position Statement	Draft DCO – CRC Runoff Control 30.41. The LLFA accepts that the principal construction-phase runoff and drainage risks associated with the Cable Route Corridor have been identified and are capable of being controlled through the proposed management framework. The remaining issue relates to demonstrating how these controls will be implemented, monitored, maintained and	The Applicant welcomes the LLFA's confirmation that the principal construction-phase runoff and drainage risks associated with the Cable Route Corridor have been identified and are capable of being appropriately controlled through the proposed management framework. The remaining implementation, monitoring, maintenance and adaptive-management

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
			adapted where necessary throughout the construction period.	matters are addressed comprehensively in the Applicant's response to DCO2.1y above and are not repeated here. Those arrangements apply equally to construction of the Cable Route Corridor through the detailed CEMP and Water Management Plan.
WC-214	Hydrology, Flood Risk and Drainage	LLFA Position Statement	30.42. The Applicant is asked to demonstrate how temporary drainage measures, runoff controls, sediment-control measures and water-quality protection measures will be implemented, monitored and maintained throughout construction of the Cable Route Corridor. Examples may include temporary drainage measures, sediment controls, inspection procedures, maintenance arrangements and corrective actions following adverse weather or incidents.	The Applicant has substantively addressed the temporary drainage, runoff control, sediment management, water-quality protection, inspection, maintenance and corrective-action framework in its response to DCO2.1y above and does not repeat those arrangements here. For the Cable Route Corridor specifically, the detailed Water Management Plan will translate the principles established within the Outline CEMP [REP5-071] and ES Volume 3 Appendix 11-9: Flood Risk Assessment and Drainage Strategy Cable Route Corridor [REP3-063] into location and phase-specific construction controls. These will take account of the final construction sequence, haul routes, compounds, excavations, watercourse crossings and existing drainage features.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				The Applicant therefore considers that the LLFA's remaining concern relates to detailed implementation rather than any gap in the secured construction water-management framework.
WC-215	Hydrology, Flood Risk and Drainage	LLFA Position Statement	OLEMP Buffers and SuDS 30.43. The LLFA supports the principle of integrating landscape management, watercourse buffers and runoff-management measures within the operational phase of the Scheme. The remaining issue relates to demonstrating how these measures contribute to riparian enhancement, natural flood management objectives and wider multifunctional benefits beyond runoff control alone.	The Applicant welcomes the LLFA's support for integrating landscape management, watercourse buffers and runoff-management measures during operation. The Applicant agrees that these measures can provide wider multifunctional benefits where compatible with their primary landscape, ecological, drainage and watercourse-protection functions. Watercourse buffers provide separation from development and support the protection of riparian corridors, while maintenance of vegetated ground cover and soil condition supports diffuse runoff, erosion control and water-quality protection. The Applicant does not, however, consider that every landscape or buffer measure should be characterised as a Natural Flood Management measure. The specific potential for NFM and wider catchment-scale flood-risk benefit has

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				been assessed separately through the Lime Down D - Natural Flood Management Viability Report [REP5-109] .
WC-216	Hydrology, Flood Risk and Drainage	LLFA Position Statement	30.44. The Applicant is asked to 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. Examples may include buffer management, habitat enhancement, infiltration opportunities, runoff attenuation measures and water quality improvements.	The Applicant has substantively addressed the relationship between operational landscape management, watercourse buffers and runoff management in its response to WC-210 above. Opportunities for multifunctional benefits have been incorporated where compatible with the primary purpose and long-term management of the relevant feature, including riparian habitat protection, maintenance of vegetated ground cover, erosion control and water-quality benefits associated with buffer areas and drainage measures. The wider potential for Natural Flood Management and strategic downstream flood-risk benefit has been assessed separately through the Lime Down D - Natural Flood Management Viability Report [REP5-109], as addressed in WC-212 and WC-213 below.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
WC-217	Hydrology, Flood Risk and Drainage	LLFA Position Statement	Strategic Flood Management and Betterment 30.45. The LLFA is not seeking additional hydraulic modelling to support the flood risk assessment. The remaining issue relates to demonstrating how opportunities for strategic flood management, natural flood management (NFM), runoff attenuation and wider catchment-scale flood risk betterment have been assessed and incorporated within the Scheme where feasible.	The Applicant welcomes the LLFA's confirmation that no additional hydraulic modelling is sought. The Applicant has now undertaken a specific assessment of opportunities for strategic flood management and Natural Flood Management at Lime Down D through the Lime Down D - Natural Flood Management Viability Report [REP5-109]. That assessment considered the scope for measures including soil-management measures, riparian interventions and additional attenuation or storage to provide wider catchment-scale benefit. It demonstrates that opportunities within the Scheme can provide localised benefits but would not materially alter the downstream flood-risk mechanism at Corston. The Applicant therefore considers that the strategic opportunities requested by the LLFA have been proportionately assessed and that the reasons for taking forward, or discounting, potential measures are now clearly evidenced.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
WC-218	Hydrology, Flood Risk and Drainage	LLFA Position Statement	30.46. The Applicant is asked to demonstrate how opportunities for natural flood management, strategic runoff reduction, catchment resilience and downstream flood risk betterment have been assessed. Where appropriate, the Applicant is requested to 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. Examples may include opportunity mapping, consideration of runoff attenuation measures, riparian restoration opportunities, or proportionate assessment of wider catchment benefits and reasons for measures adopted or discounted.	The Applicant has substantively addressed the consideration of Natural Flood Management and strategic flood-risk betterment in its response to WC-212 above. For completeness, the Lime Down D - Natural Flood Management Viability Report [REP5-109] demonstrates that Lime Down D represents less than 8% of the approximately 26.3 km² catchment upstream of Corston. The assessment found that soil-management and riparian measures represent the most appropriate local opportunities, but that their influence on downstream peak flows would be limited by the comparatively small proportion of the overall catchment within the Scheme. More substantial storage interventions were also considered. The maximum storage scenario assessed was approximately 125,900 m³, compared with an estimated storage requirement of approximately 469,000 m³ to materially influence the downstream flood mechanism. The assessment further identifies the A429 crossing at Corston as a principal local conveyance constraint.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				The Applicant has therefore considered both local and strategic opportunities rather than assuming that additional NFM would necessarily provide meaningful downstream betterment. Measures which are appropriate within the Scheme, including soil protection, riparian buffers and runoff management, remain incorporated through the relevant management plans, while larger interventions which would not provide a proportionate or material catchment-scale benefit have not been taken forward.
WC-219	Hydrology, Flood Risk and Drainage	LLFA Position Statement	Wiltshire LLFA Review of Revised Draft DCO, Explanatory Memorandum and Schedule of Changes 30.47. The purpose of the LLFA's review was to consider whether hydrology, flood risk, drainage, water quality and related environmental commitments relied upon by the Applicant are adequately secured through the DCO framework.	The Applicant notes the purpose of the LLFA's review of the revised Draft DCO [REP5-012], Explanatory Memorandum [REP5-014] and Schedule of Changes [REP5-092]. The Applicant has responded to the individual hydrology, flood risk, drainage and water-environment matters arising from that review in the relevant responses elsewhere in this document. More generally, the relationship between the mitigation relied upon by the assessment, associated monitoring and maintenance

Reference	Theme	Issue	Comments/Issue Raised					Applicant's Response
								requirements and the mechanisms by which those measures are secured is consolidated within Table 3-5: Hydrology, Flood Risk and Drainage of the Mitigation Route Map [REP5-102] .
WC-220	Hydrology, Flood Risk and Drainage	LLFA Position Statement	Ref	Area	LLFA Observation	Potential Consequence	Recommended Action	The Applicant notes the LLFA's observation regarding reliance on the detailed management-plan framework. The Applicant has included the LLFA as a consultee as part of the discharge of Requirement 11 at Deadline 5.
			DCO-01	Management Framework	Applicant case relies heavily on CEMP, OEMP, Water Management Plans and future approvals.	Reliance on future documents may reduce certainty if requirements are not sufficiently specific.	Confirm assumptions relied upon FRA and Drainage Strategy clearly through Requirement	This will mean that Wiltshire Council is required to consult with the LLFA as part of the discharge of the outline drainage strategy. The Applicant does not consider that the use of detailed CEMP, OEMP, Water Management Plan and other phase-specific documents reduces certainty. Those documents are the mechanism through which the mitigation principles and commitments established and assessed at this stage are translated into the final site and phase-specific arrangements once the detailed design and construction methodology are known. They must remain in

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				accordance with the relevant certified outline documents and DCO Requirements. The key hydrology, flood risk and drainage assumptions relied upon by the assessment, including drainage design principles, runoff control, flood resilience, watercourse protection, soil and vegetation management and construction water-management controls, are secured through the relevant Requirements and certified documents. Their relationship to the assessment and securing mechanism is consolidated within Table 3-5: Hydrology, Flood Risk and Drainage of the Mitigation Route Map [REP5-102]. The Applicant therefore considers that the DCO framework provides an appropriate balance between securing the environmental outcomes relied upon by the assessment and retaining the detailed-design flexibility necessary for implementation.
WC-221	Hydrology, Flood	LLFA Position Statement		The Applicant has substantively addressed the monitoring and assurance matters identified by the LLFA in its responses to DCO2.1y and

Reference	Theme	Issue	Comments/Issue Raised					Applicant's Response
	Risk and Drainage		Ref	Area	LLFA Observation	Potential Consequence	Recommended Action	DCO2.1ae above and does not repeat those arrangements here. Those responses address monitoring and inspection, reporting, responsibilities, intervention and investigation, corrective action and management review during construction and operation. The Applicant considers that performance indicators and intervention criteria should be proportionate to the particular measure being monitored rather than prescribed as common numerical thresholds across all drainage, soil and vegetation controls. The relationship between the individual mitigation measures, their monitoring requirements and securing mechanisms is consolidated within Table 3-5 of the Mitigation Route Map [REP5-102] .
			DCO-02	Monitoring and Assurance	Monitoring obligations appear less explicit than mitigation commitments.	Limited evidence of long-term performance verification.	Clarify monitoring reports trigger correct action required	
WC-222	Hydrology, Flood Risk and Drainage	LLFA Position Statement	Ref	Area	LLFA Observation	Potential Consequence	Recommended Action	The Applicant welcomes the LLFA's acknowledgement that protective watercourse corridors are provided. The long-term protection, inspection and maintenance of watercourse buffers and

Reference	Theme	Issue	Comments/Issue Raised					Applicant's Response
			DCO-03	Watercourse Buffers and Maintenance	Protective corridors are proposed but long-term operational arrangements should be clear.	Potential uncertainty regarding future maintenance access and management.	Confirm protective section maintenance arrangements within operational documents	drainage corridors is addressed in the Applicant's responses to WC-194 and WC-195 above and is not repeated here. In summary, these corridors will remain free from permanent development except where an authorised crossing or other specific interaction is required. Their management will maintain the function of the watercourse and appropriate access for inspection and maintenance, with vegetation managed through the relevant operational, landscape and ecological management arrangements.
WC-223	Hydrology, Flood Risk and Drainage	LLFA Position Statement						The Applicant welcomes the LLFA's acknowledgement that an approval framework for HDD and other sensitive watercourse crossings is already provided. The review and approval pathway is addressed substantively in the Applicant's responses to FHW2.6d and WC-198 to WC-199 above and is not repeated here. Sensitive crossings and the indicative crossing methodology are identified through the Watercourse Crossing Schedule [REP3-122]
			Ref	Area	LLFA Observation	Potential Consequence	Recommended Action	
			DCO-04	HDD Crossings	Framework for approval exists.	Need confidence in consistent treatment of sensitive crossings.	Clarify and approve HDD risk assessment	

Reference	Theme	Issue	Comments/Issue Raised					Applicant's Response
								and associated mapping [REP3-139] . The final crossing design and methodology will then be developed through detailed design and supported by the appropriate risk assessment and method statement, including the relevant hydrological, hydrogeological, pollution-prevention and contingency measures. These will be controlled through the detailed CEMP and the applicable drainage authority or Environment Agency approval mechanisms.
								The Applicant therefore considers that the existing framework provides for the consistent identification, assessment, review and approval of sensitive crossings without the need for an additional bespoke HDD approval mechanism.
WC-224	Hydrology, Flood Risk and Drainage	LLFA Position Statement	Ref	Area	LLFA Observation	Potential Consequence	Recommendation	Further clarification on monitoring and intervention triggers is discussed in item WC-207.
			DCO-05	SPZ Protection	Groundwater controls	Monitoring and intervention process may	Confirm triggers, sibilities	

Reference	Theme	Issue	Comments/Issue Raised					Applicant's Response
					generally provided	require further clarity.	responders	procedures
WC-225	Hydrology, Flood Risk and Drainage	LLFA Position Statement						The Applicant welcomes the LLFA's acknowledgement that the construction runoff controls for the Cable Route Corridor have been identified. The implementation, inspection, maintenance and corrective-action arrangements for those controls are addressed comprehensively in the Applicant's responses to DCO2.1y and WC-208 to WC-209 above and are not repeated here. In particular, the detailed CEMP and Water Management Plan will establish the location and activity-specific temporary drainage and sediment controls, together with appropriate inspection frequencies, maintenance requirements, monitoring and corrective actions having regard to the construction activity, receiving environment and prevailing weather conditions. The Applicant therefore considers that the effectiveness of the Cable Route Corridor
			Ref	Area	LLFA Observation	Potential Consequence	Recommendation	
			DCO-06	Cable Route Corridor Controls	Construction runoff controls identified.	Effectiveness depends on implementation and inspection.	Clarify inspection frequencies and maintenance corrective actions.	

Reference	Theme	Issue	Comments/Issue Raised					Applicant's Response
								controls is appropriately secured through the construction management framework.
WC-226	Hydrology, Flood Risk and Drainage	LLFA Position Statement						The Applicant notes the LLFA's observation regarding the long-term management of non-structural SuDS and runoff-management measures. This matter is addressed substantively in the Applicant's responses to WC-186, WC-187 and WC-202 to WC-203 above and is not repeated here. The relevant measures include maintenance of vegetated ground cover, protection and remediation of soil structure, retention of watercourse buffers and existing drainage pathways, together with the formal drainage and attenuation measures established through the Flood Risk Assessment and Drainage Strategy suite [REP5-047 to REP5-060]. Their respective monitoring, maintenance and securing mechanisms are identified within Table 3-5: Hydrology, Flood Risk and Drainage of the Mitigation Route Map [REP5-102]. The Applicant therefore considers that the
			Ref	Area	LLFA Observation	Potential Consequence	Recommended Action	
			DCO-07	SuDS and Runoff Management	Scheme relies partly on non-structural SuDS measures.	Long-term delivery depends on operational management.	Demonstrates how measures are secured and maintained	

Reference	Theme	Issue	Comments/Issue Raised					Applicant's Response
								operational delivery of the SuDS and runoff-management principles relied upon by the assessment is appropriately secured.
WC-227	Hydrology, Flood Risk and Drainage	LLFA Position Statement						The Applicant agrees that opportunities for Natural Flood Management and wider flood-risk betterment should be considered where they are feasible and proportionate.
			Ref	Area	LLFA Observation	Potential Consequence	Recommended Action	That assessment has now been undertaken through the Lime Down D - Natural Flood Management Viability Report [REP5-109] , as addressed in the Applicant's responses to WC-181 and WC-212 to WC-213 above. The assessment considered a range of potential measures, including soil-management and riparian measures and more substantial attenuation and storage interventions.
			DCO-08	Strategic Betterment	Limited evidence of specific DCO mechanisms securing wider NFM benefits.	Enhanced flood-risk benefits may not be fully realised.	Explain NFM and betterment opportunities considered where feasible	The assessment demonstrates that soil-management and riparian measures represent appropriate local opportunities and these principles are already incorporated within the relevant management framework. More substantial NFM interventions were not found to provide a proportionate or material reduction in downstream flood risk and have therefore not

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				been relied upon as mitigation or proposed as additional DCO commitments. Separately, runoff betterment from positively drained areas is secured through the drainage strategy, including the committed restriction of post-development discharge relative to the greenfield condition. The basis of that approach is addressed comprehensively in the Applicant's response to FHW2.2a above. The Applicant therefore does not consider that additional DCO mechanisms are required to secure hypothetical wider NFM benefits which the assessment demonstrates would not materially influence downstream flood risk. Measures which provide appropriate and proportionate local benefits are already incorporated and secured through the existing drainage, soil, landscape and environmental management framework.
WC-228	Landscape and Visual	Response to Action Point 2 from Issue	31. Response to Action Point 2 from Issue Specific Hearing 2 (Deferred Response) 31.1. The council was requested to provide reference to any Nationally Significant	The Applicant recognises that differences in professional opinion exist between the Applicant and WC, however the Applicant maintains that the LVIA set out in ES Volume 1, Chapter 8: Landscape and Visual [REP3-

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
		Specific Hearing 2	Infrastructure Project assessments where the assessment of landscape fabric has included both man made and natural components in character assessment. 31.2. Following review, the council provides the following Development Consent Order references, where both natural and man-made landscape components have been included within their respective LVIA's as specific landscape fabric receptors, assessed separately to assessment of Landscape Character receptor's.	025], has been undertaken with consideration of the appropriate and relevant guidance and robustly assesses both the landscape and visual effects of the Scheme independently to ensure both the impacts and effects on the fabric and character of the landscape are taken into account as well as the views and visibility. It should be noted that GLVIA3 is not a prescriptive methodology for undertaking Landscape and Visual Impact Assessment (LVIA) but rather provides a framework of principles and good practice within which professional judgement is applied. The Landscape Institute's Technical Guidance Note LITGN-2024-01 Published August 2024, Notes and Clarifications on Aspects of Guidelines for Landscape and Visual Impact Assessment Third edition (GLVIA3) sets out that the purpose of LVIA is to communicate the landscape professional's judgement about changes to landscape and views, and that achieving that outcome is more fundamental to good LVIA than the detailed mechanics of a particular methodology. It also expressly says

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
				that <i>"variation and debate are to be expected rather than discouraged."</i> And that whilst <i>"GLVIA3 provides a structured process for assessing effects on landscape and visual resources. The responsibility of the assessor is to tailor it to the place and project under consideration, supported by an explanation of the rationale behind the approach taken."</i>
WC-229	Landscape and Visual	Response to Action Point 2 from Issue Specific Hearing 2	HyNet Carbon Dioxide Pipeline Order (EN070007) 31.3. The principal LVIA document is: ES, Volume III, Appendix 12.2 – Landscape and Visual Impact Assessment Methodology (Document Reference: D.6.3.12.2). 31.4. The methodology at Paragraph 6.1.3 clearly includes reference to 'built form' as a landscape fabric / element i.e. <i>"Landscape fabric / elements - specific features and elements that make up the landscape such as the topography, vegetation and <u>built form</u>."</i>	The Applicant refers to its response to WC-228.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
WC-230	Landscape and Visual	Response to Action Point 2 from Issue Specific Hearing 2	Cottam Solar Project Order (2024) (EN010133) 31.5. The principal LVIA documents are: • ES, Chapter 8 – Landscape and Visual Impact Assessment (Rev A) (Document Reference: EX2.C6.2.8_A) • ES, Appendix 8.1 – LVIA Methodology (Document Reference: C6.3.8.1) • ES, Appendix 8.2 – Potential Land Effects (Rev A) (Document Reference: EX1/C6.3.8.2_A) 31.6. The LVIA and its supporting appendices submitted for the Cottam Solar Project (also prepared by Lanpro) clearly includes Land Use, as a specific landscape receptor within its landscape assessment alongside other specific landscape receptors including; Topography and watercourses; Public Rights of Way and Access; Communication and Infrastructure; Settlements, Industry commerce and leisure; National and Locally designated landscapes; Cultural Designations; Ancient Woodlands and Natural Designations.	The Applicant refers to its response to WC-228.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
WC-231	Landscape and Visual	Response to Action Point 2 from Issue Specific Hearing 2	31.7. It should also be noted that the ES landscape assessment sheets clearly treat the introduction of solar panels and substations as new landscape fabric component additions introduced into the landscape which have been assessed separately from the assessment of landscape character / character areas.	The Applicant refers to its response to WC-228.
WC-232	Ecology and Biodiversity	Update on Response to Action Point 26 from Issue Specific Hearing 3	32. Update on Response to Action Point 26 from Issue Specific Hearing 3 32.1. Further to the council's response to this Action Point within its Post Hearing Submissions and Responses to Action Points Arising [REP4-0932] and noting the ExA's original request for a response to be provided at Deadline 5, the council can confirm that discussions with the Applicant are ongoing with regards to the mechanism to ensure resources for monitoring, including Biodiversity Net Gain.	The Applicant notes the comment and acknowledges that discussions are ongoing. The Applicant has provided Wiltshire Council with a draft Planning Performance Agreement and a draft Section 106 Agreement for consideration.
WC-233	Description and DCO Process	Update on Response to Action Point 26 from Issue	32.2. The Applicant and Wiltshire Council had a further constructive meeting on Wednesday 29 July, and following this, the Applicant is working on preparing the first drafts of the Section 106	The Applicant has provided Wiltshire Council with a draft Planning Performance Agreement and a draft Section 106 Agreement for consideration.

Reference	Theme	Issue	Comments/Issue Raised	Applicant's Response
		Specific Hearing 3	and a further Planning Performance Agreement to cover the post-consent stage.	
WC-234	Ecology and Biodiversity	Update on Response to Action Point 26 from Issue Specific Hearing 3	32.3. Discussion between the parties continues on the matters to be covered through the Section 106 agreement, although agreement has been reached that it will definitely cover monitoring, including for Biodiversity Net Gain.	The Applicant has provided Wiltshire Council with a draft Section 106 Agreement which covers monitoring fees.
WC-235	Description and DCO Process	Update on Response to Action Point 26 from Issue Specific Hearing 3	32.4. Wiltshire Council will continue to work with the Applicant in order to be able to submit a signed and dated Section 106 agreement at Deadline 7 in accordance with the examination timetable.	The Applicant notes this comment and confirms that it will work with Wiltshire Council in order to be able to submit a completed Section 106 Agreement prior to the close of the Examination.

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

3.1 Environment Agency

Table 3-1 Environment Agency: Appendix 1 – Responses to Examining Authority's Second Written Questions

ExQ2	Question to:	Question:	Environment Agency Response	Applicant's Response
Draft Development Consent Order (dDCO)				
Questions within this section refer to the dDCO updated at Deadline 4 [REP4-004] (clean version)/ [REP4-005] (tracked version)				
General Matters				
DCO2.1	All Interested Parties and Statutory Undertakers	Residual Issues with the dDCO and Management Plans The dDCO is an important document and the ExA is under a duty to provide the SoS with a recommended version of the	1) If it is not possible to place the substation within Lime Down C1 outside of the mapped flood flow routes, further assessment will need to be undertaken at detailed design to determine if the placement of the substation within	The Applicant has substantively addressed the Environment Agency's request for an additional Lime Down C1 flood mitigation Requirement in FHW2.5. The precise location of the Lime Down C1 132 kV Substation remains subject to detailed design. Avoidance remains the preferred approach and the detailed design will first seek to locate the substation outside the mapped flood flow routes identified within ES Volume 3 Appendix 11-4: Flood Risk Assessment and Drainage Strategy Lime Down C1 [REP5-051]. Where this cannot be achieved, a site-specific flood risk assessment and, where required, proportionate hydraulic modelling will

ExQ2	Question to:	Question:	Environment Agency Response	Applicant's Response
		DCO. This is because the SoS is the decision maker. Therefore, even if the ExA were to recommend to the SoS that development consent should not be granted, the ExA must still append a recommended version of the DCO, thus it is important that the ExA is able to put forward the best DCO that it can. The dDCO has been revised four times during the examination to date. A	Lime Down C1 would increase flood risk elsewhere. If there is an increase to flood risk elsewhere, floodplain compensation will be provided, in consultation with the Environment Agency, to ensure that there is no increase in flood risk. Engagement with the Environment Agency will occur throughout the detailed design stage on the need, method of calculating volumes, modelling and design of any floodplain compensation that	demonstrate that the final layout maintains flood conveyance and storage and does not increase flood risk elsewhere. Where mitigation is required, this may include localised level adjustments, compensatory flood storage or other measures necessary to maintain existing floodplain function. The Applicant does not consider that a separate additional Requirement is necessary. The final Lime Down C1 substation design is already subject to approval under Requirement 5. As part of that approval, the Applicant must demonstrate that the detailed design does not give rise to materially new or different environmental effects from those assessed in the ES. Where the substation interacts with the mapped flow routes, the site-specific flood risk assessment and any necessary modelling and mitigation will therefore form part of that detailed design process. The Applicant will continue to engage with the Environment Agency on the assessment and design of any flood mitigation required. The existing DCO framework therefore already secures the environmental outcome sought by the Environment Agency, namely that the final substation design will not increase flood risk elsewhere,

ExQ2	Question to:	Question:	Environment Agency Response	Applicant's Response
		proportion of what has been requested by interested parties has been included in the Order, another proportion has been addressed through the updating of associated management plans, and other elements the applicant has resisted with reasons. While the position of many interested parties and/or statutory undertakers may be that development consent should not be granted, without	may be required. We would need to secure this through a requirement within the Development Consent Order. We would request the following wording to secure this: Additional Flood Mitigation Requirement <i>No development shall take place within Lime Down C1 until the location of the substation has been confirmed, an assessment of flood risk has been undertaken and a mitigation plan have been</i>	without the need for a duplicative standalone flood mitigation Requirement.

ExQ2	Question to:	Question:	Environment Agency Response	Applicant's Response
		prejudice to your position, you are invited to: 1) Outline any remaining or residual issues that you have with any articles, requirements or schedules of the dDCO, set out why the applicant has not yet resolved your concerns or why you are not content with the applicant's justification, and define what remedy or solutions you are seeking (including suggested redrafting if	<i>submitted to, and approved in writing by, the Local Planning Authority, in consultation with the Environment Agency, and these works shall be carried out as Approved.</i> <i>Note:</i> <i>Should the assessment show increased flood risk, the mitigation plan should include a Floodplain Compensation Scheme. Any proposed compensation scheme must demonstrate:</i> <i>a) no net loss of floodplain storage within</i>	

ExQ2	Question to:	Question:	Environment Agency Response	Applicant's Response
		applicable) to address your concerns, and explain (make your case) why the applicant, the ExA and the SoS should consider such amendments to the dDCO. Statutory Undertakers are also alerted to ExQ2 DCO2.23 which specifically relates to protected provisions.	<i>the design flood event;</i> <i>b) compensation provided on a level-for-level and volume-for-volume basis where appropriate;</i> <i>c) no increase in flood risk elsewhere;</i> <i>d) implementation of compensatory storage prior to the associated floodplain loss; and</i> <i>e) appropriate maintenance of the compensation scheme is in place during</i>	

ExQ2	Question to:	Question:	Environment Agency Response	Applicant's Response
			<i>the operation phase.</i> “Substantially in accordance with” requirements with the Environment Agency as a consultee. The use of the word ‘substantially’ in the dDCO requirements undermines the enforceability of proposals and/ or may erode the environmental protections put in place. The overarching plans provide a large scope for the detail to come later, and the Rochdale	

ExQ2	Question to:	Question:	Environment Agency Response	Applicant's Response
			envelope applies – thus flexibility is built into the process. To resolve this matter, we request the words 'substantially' be removed from the requirements identified. Procedure for Discharge of Requirements We require a 15 working day consultation period as set out in our written representation REP1-11	
DCO2.1	All Interested Parties and Statutory Undertakers	2) Outline any remaining or residual issues that you have with any of the management plans/	2) Outline Construction Environmental Management Plan (Latest Version, Revision 5 [REP4-049]) We may be	ES Volume 1, Chapter 19: Ground Conditions [REP5-026] has identified potential Source Pathway Receptor links for thermal impact from the cables (source) on the underlying aquifers and source protection zones (receptor) via thermal advection, diffusion and dispersion (pathway) and identifies Very Low ratings.

ExQ2	Question to:	Question:	Environment Agency Response	Applicant's Response
		documents listed below, set out why the applicant has not yet resolved your concerns or why you are not content with the applicant's justification, and define what remedy or solutions or amendments you are seeking to address your concerns within the drafting of the relevant management plan(s)/ document(s): Outline Construction Environmental Management Plan (Latest	able to resolve EA-030 Thermal implications of cables if a commitment to secure assessment of thermal impacts, and route the cables accordingly, prior to construction can be included in the Outline Construction Environment Management Plan. This is under discussion with the applicant. We request that the applicant adds an additional commitment into their Outline Construction Environmental	The Applicant therefore maintains that a formal, standalone thermal impact assessment for the cable route is not required, as the potential for significant adverse environmental effects from incidental cable heat loss is Very Low. Regardless of the fact, it should be noted that the Applicant has committed to undertake a groundwater monitoring plan as part of the Outline CEMP [REP5-071]. Further text has been added to the Outline CEMP [EN010168/APP/7.12] (Revision 7) at Deadline 6 of Examination to provide additional narrative around what this monitoring plan would entail for completeness. This position is supported by recent evidence from the Environment Agency's Chief Scientist's Group regarding the environmental impacts of temperature changes from ground source heating and cooling (GSHC) systems. https://www.gov.uk/government/publications/environmental-impacts-of-temperature-changes-from-ground-source-heating-and-cooling-systems/environmental-impacts-of-temperature-changes-from-ground-source-heating-and-cooling-systems-summary That research demonstrates that even for systems specifically designed for active heat exchange, such as household sized close loop GSHC units (<45 kW

ExQ2	Question to:	Question:	Environment Agency Response	Applicant's Response
		Version, Revision 5 [REP4-049]) • Outline Operational Environmental Management Plan (Latest Version, Revision 5 [REP4-051]) • Outline Decommissioning Strategy (Latest Version, Revision 3 [REP3-096]) • Outline Soil Resources Management Plan (Latest Version, Revision 2 [REP3-098]) • Outline Site Waste Management	Management Plan that any fish rescue using equipment other than rod and line must have written permission from the Environment Agency under S27(a) of the Salmon and Freshwater Fisheries Act 1975. A full method statement should be submitted when applying for permission detailing on locations, timings, equipment being used, fish welfare measures and reason for rescue. Further information can be found here: Apply to use fishing	capacity), thermal plumes only travel approximately 10m. Given that incidental heat loss from the Scheme's buried cables is an unintentional byproduct rather than an active heat-transfer process, and that insulated cables are buried at a minimum depth of 1.2m, any thermal footprint would be significantly more limited and localised. While the Applicant has already committed to routing cables horizontally and vertically based on location-specific hydrogeological data to avoid interaction with sensitive receptors, the inclusion of a formal thermal impact assessment within the Outline CEMP [REP5-071] is considered disproportionate and unnecessary. Regarding pre-condition ecological surveys, the Applicant confirms that an updated version of the Outline CEMP [REP5-071] was submitted at Deadline 5 and includes the agreed text provided in the Environment Agency's comment relating to fish rescue permissions. This text was also included within an updated version of the Outline EPMS [REP5-081] submitted at Deadline 5, alongside additional text to address the Environment Agency's request relating to timing of pre-construction surveys. The document now confirms that pre-construction inspections for riparian mammals would be undertaken 2 months prior to works commencing watercourse crossing locations.

ExQ2	Question to:	Question:	Environment Agency Response	Applicant's Response
		Plan (Latest Version, Revision 2 [REP1-102]) • Outline Public Rights of Way and Permissive Paths Management Plan (Latest Version, Revision 1 [APP-282]) • Outline Landscape and Ecological Management Plan (Latest Version, Revision 2 [REP3-100]) • Outline Ecological Protection and Mitigation Strategy	instruments other than rod and line in England - GOV.UK Outline Ecological Protection and Mitigation Strategy (Latest Version, Revision 4 [REP4-055]). We have requested greater clarity on the timing of pre-construction surveys and for them to be undertaken two months before works. The applicant has agreed with this and we await a revised version of the document for our review.	The Applicant notes the Environment Agency's comments on the ES Volume 3 Appendices 11-1 – 11-8: Flood Risk Assessment and Drainage Strategy suite [REP4-021, REP5-047 to REP5-060]. For Lime Down C1, the Applicant agrees that the Environment Agency's Flood Map for Planning Surface Water Spatial Planning Extents, including the Upper End climate change allowance for the 2070s epoch, provides a useful additional sensitivity test for the proposed 132 kV Substation within Field C33. The current ES Volume 3 Appendix 11-4: Flood Risk Assessment and Drainage Strategy Lime Down C1 [REP5-051] assesses the identified surface water flow route using the January 2025 NaFRA mapping and includes the 0.1% AEP surface water extent as a precautionary sensitivity check. The Applicant will therefore also review the recently published Upper End 2070s Surface Water Spatial Planning Extents against Field C33 and incorporate the outcome of that sensitivity check into the updated ES Volume 3 Appendix 11-4: Flood Risk Assessment and Drainage Strategy Lime Down C1 [REP5-051] at Deadline 6. The purpose of the review will be to confirm whether the newer dataset identifies any material change

ExQ2	Question to:	Question:	Environment Agency Response	Applicant's Response
		(Latest Version, Revision 4 [REP4-055]) - Outline Skills, Supply Chain and Employment Plan (Latest Version, Revision 1 [APP-285]) - Outline Battery Safety Management Plan (Latest Version, Revision 3 [REP3-106]) - Outline Construction Traffic Management Plan (Latest Version, Revision 4 [REP4-057])	Outline Drainage Strategy (Latest Version, Revision 4, [REP4-021], [REP4-023], [REP4-025], [REP4-027], [REP4-029], [REP4-031], [REP4-033], [REP4-035]) Lime Down C1 In terms of the mapped Surface Water flow route, it is worth noting that on the 28th May 2026, the Environment Agency published the <i>Flood Map for Planning – Surface Water Spatial Planning Extents</i> which includes an Upper allowance for climate change for the 2070s epoch (2061 to	in the extent or depth of the mapped flow route relevant to the indicative substation area. The design approach remains unchanged. The final substation platform will preferentially be located within the lower-risk part of Field C33 and outside the mapped surface water flow route. If the final detailed design cannot avoid the flow route in full, the design will be required to demonstrate that existing conveyance and storage are maintained and that there is no increase in flood risk elsewhere, with further site-specific assessment and mitigation provided where necessary. This approach is already established within the ES Volume 3 Appendix 11-4: Flood Risk Assessment and Drainage Strategy Lime Down C1 [REP5-051]. For Lime Down D, the Applicant has submitted the updated Lime Down D - Hydraulic Modelling Report [REP5-095], incorporating the additional hydrological information and extended channel survey requested through the Environment Agency's review. The relevant ES Volume 3: Appendix 11-6 Flood Risk Assessment and Outline Drainage Strategy Lime Down D [REP5-055] will be checked against the final modelling outputs

ExQ2	Question to:	Question:	Environment Agency Response	Applicant's Response
		- Outline Archaeological Mitigation Strategy (Latest Version, Revision 1 [APP-230]) - Outline Drainage Strategy (Latest Version, Revision 4, [REP4-021], [REP4-023], [REP4-025], [REP4-027], [REP4-029], [REP4-031], [REP4-033], [REP4-035]) - Outline Water Resources Strategy (Latest Version, Revision 1 [APP-290])	2125). This is available here: Defra Data Services Platform This could serve as a valuable sensitivity test to understand how increasing rainfall and resultant flow might influence flood extent in the vicinity of the proposed substation in field C33. It would be sensible to review this dataset to ensure that there are no significant changes in flood extent and depth. <u>Lime Down D/BESS</u>	and any consequential updates to figures or supporting text incorporated where required. For Lime Down E2, the Applicant notes that the hydraulic modelling remains subject to Environment Agency review. The Applicant will continue to engage with the Environment Agency and will address any substantive matters arising from that review through the relevant hydraulic modelling and ES Volume 3: Appendix 11-8 Flood Risk Assessment and Outline Drainage Strategy Lime Down E2 [REP5-059], as required. The Applicant therefore considers that the remaining hydrology matters identified by the Environment Agency are capable of being addressed through the targeted updates and ongoing technical review described above and do not require any change to the overall drainage strategy framework.

ExQ2	Question to:	Question:	Environment Agency Response	Applicant's Response
			The Gauze Brook runs through Lime Down D and is subject to ongoing hydraulic modelling updates and hence there may be a requirement to update some of the figures and information within the Flood Risk Assessment once this modelling is finalised. <u>Lime Down E2</u> The hydraulic modelling for Lime Down E2 is currently under review. Our initial comments are set out in Appendix 2.	
Schedule 15 – Protected Provisions				
DCO2.2 3	All Statutory	Status and Proposed	Please see Appendix 4 for our	The Applicant has reviewed the protective provisions for the Environment Agency in light of the comments made.

ExQ2	Question to:	Question:	Environment Agency Response	Applicant's Response
	Undertaker's Wiltshire Council	Revisions As per the examination timetable, all Statutory Undertakers and Wiltshire Council are requested to submit their proposed version of protective provisions that they wish to see included for their benefit in the dDCO but have not been agreed by the applicant. Please also set out why you are not content with the applicant's version in Schedule 15 of Revision 4 of the	standard protective provisions which we require the applicant to include within the Development Consent Order to disapply the need for Flood Risk Activity Permits under the Environmental Permitting (England and Wales) Regulations 2016. We note the applicant has made changes to make the protective provisions in accordance with our standard protective provisions in their Draft	The only substantive difference is regarding the inclusion of the following in respect of the indemnity clause "The undertaker indemnifies the Agency in respect of all costs, charges and expenses which the Agency may <i>reasonably</i> incur". The Applicant considers this an appropriate inclusion. The rest of the differences relate to cross referencing in order to reflect the incorporation of the protective provisions into the Draft DCO [REP5-012].

ExQ2	Question to:	Question:	Environment Agency Response	Applicant's Response
		dDCO [REP4-004] , and explain why the ExA and Secretary of State should prefer your suggested drafting.	Development Consent Order (Rev 4) [REP4-004]. We are satisfied with the use of the <i>Order Limits</i> rather than <i>Limits of Deviation</i> in <i>96 Maintenance of works</i> as Lime Down does not have any Limits of Deviation. However, there are still some minor discrepancies which we require to be amended in accordance with our standard protective provisions set out in Appendix 4 for consistency. For example in works not in accordance with the schedule 95; maintenance of	

ExQ2	Question to:	Question:	Environment Agency Response	Applicant's Response
			works 96, agency access 98 and free passage of fish 99. Please can these be Corrected.	
Ecology and Biodiversity				
EB2.3	The Environment Agency (EA) The Applicant	Riparian Species <u>The Environment Agency:</u> 1) The EA's deadline 4 submission [REP4-097] confirms that spot checks undertaken by the applicant were not done as per Chartered Institute of Ecologists and Environmental Managers	Our concern regarding the spot-checks was a separate issue to the concern regarding the riparian buffer width. However, a discussion with the applicant was held on 28th July 2026, following the Examination Hearing. We have now agreed with the applicant's proposal to maintain a minimum 8 metre watercourse buffer from ditches,	The Applicant welcomes the Environment Agency's agreement on the proposed 8m minimum watercourse buffer from ditches. The Applicant confirms that an updated version of the Outline EPMS [REP5-081] has been submitted at Deadline 5, including additional text to address the Environment Agency's concerns request relating to pre-commencement surveys. The document now confirms that pre-construction inspections for riparian mammals would be undertaken 2 months prior to works commencing watercourse crossing locations.

ExQ2	Question to:	Question:	Environment Agency Response	Applicant's Response
		(CIEEM) guidelines. If the applicant adopted the 10m watercourse buffer would this overcome the EA's concerns regarding the survey work. 2) If this approach would not address the EA's concerns, please provide any further comment regarding the potential adverse effects on riparian species that could be caused by the applicant's approach,	following assurance from the applicant and a review of Confidential Appendix 9-8 (Schedule of Protective Ecological Buffers APP-205). The applicant has also provided further clarity around their planned pre-commencement surveys, and has agreed to update the Outline Ecological Protection and Mitigation Strategy (Latest Version, Revision 4 REP4-055). Subject to a review of the updated document, this	

ExQ2	Question to:	Question:	Environment Agency Response	Applicant's Response
		considering the applicant's justification in [REP4-086]. <u>The Applicant:</u> Given the concerns raised by the EA regarding the spot checks methodology, can you confirm that you would provide for a 10m watercourse buffer throughout the Order limits to reduce the potential effects. Please note that your response could impact your reply to ExQ EB2.13.	would satisfy our concerns regarding survey work.	

ExQ2	Question to:	Question:	Environment Agency Response	Applicant's Response
Flood Risk, Hydrology and Water Resources (FWH)				
FHW2.3	The Environment Agency The Lead Local Flood Authority	Flood Risk Assessment – Hydraulic Modelling The EA, in its hearing submission [REP4-097], explains that for Lime Down D modelling there are unresolved issues regarding the data used and missing information and requests further information from the applicant. The applicant submitted at deadline 4 the hydraulic modelling report	1) We have undertaken a review of the applicant's hydraulic modelling for the Gauze Brook, which passes through the Lime Down D site. During our review, we requested that the applicant simulate the 3.3% (1 in 30) annual exceedance probability (AEP) event to define the extent of the functional floodplain (Flood Zone 3b). We also raised technical comments on the model itself relating to riverbank	The Applicant notes the Environment Agency's confirmation that the requested 3.3% AEP event has been modelled and the corresponding functional floodplain extent has been provided. The remaining Environment Agency comments related to riverbank elevations and the representation of the South Wales Main Line culvert. The Gauze Brook hydraulic model, within the Lime Down D – Hydraulic Modelling Report [REP5-095], was updated and extended to address those points and the revised model files were submitted to the Environment Agency at Deadline 5 for detailed review. Any consequential amendments required following the Environment Agency's review will be incorporated into the relevant Lime Down D flood risk documentation.

ExQ2	Question to:	Question:	Environment Agency Response	Applicant's Response
		for Lime Down E2 [REP4-089]. <u>The Environment Agency:</u> 1) Can the EA confirm if all the required further information for Lime Down D modelling has been submitted?	elevations within the model and the representation of the South Wales Main Line culvert. The applicant has subsequently simulated the 3.3% (1 in 30) AEP event and updated the hydraulic modelling report to include mapping of the corresponding flood extent. However, we have not yet received updated hydraulic model files for the Gauze Brook (Lime Down D) to enable a detailed review of any changes relating to riverbank representation and the South Wales	

ExQ2	Question to:	Question:	Environment Agency Response	Applicant's Response
			Main Line culvert. We met with the applicant on 28 July 2026 and understand that they are currently updating and extending the Gauze Brook hydraulic model. Once these updates have been completed, the applicant intends to submit the revised model files to the Environment Agency for detailed review.	
FHW2.3	The Environment Agency The Lead Local Flood Authority	2) Can the EA please provide an update of the review of the hydraulic modelling for Lime Down E2 at deadline 5	2) In relation to Lime Down E2, the applicant has submitted hydraulic model files and an associated hydraulic model	The Applicant welcomes the Environment Agency's confirmation that no significant issues have been identified with the Lime Down E2 hydraulic modelling at this stage. The Applicant will continue to engage with the Environment Agency through completion of its review and will address any substantive comments arising through the

ExQ2	Question to:	Question:	Environment Agency Response	Applicant's Response
		confirming if further information is required and highlighting any significant issues found? Applicant's note: <i>The Applicant has not reproduced the remainder of the ExA's question in this table, as the EA's submission does not provide a response to that part of the question.</i>	report for Rodbourne Brook/Gabriel's Well. We are currently reviewing the modelling and supporting documentation. At this stage, we have not identified any significant issues with the modelling. However, our review is ongoing and we will provide detailed comments to the applicant in due course. Appendix 2 sets out our initial comments.	relevant hydraulic modelling and ES Volume 3: Appendix 11-8 Flood Risk Assessment and Outline Drainage Strategy Lime Down E2 [REP5-059], as required.
FHW2.7	The Environment Agency The Lead Local	Construction – Impacts on Flood Risk and Drainage	As of the most recent submission of the Outline Construction Environmental Management Plan	The Applicant welcomes the Environment Agency's confirmation that the Outline CEMP [REP5-071] now contains sufficient commitments to address construction-

ExQ2	Question to:	Question:	Environment Agency Response	Applicant's Response
	Flood Authority	The EA requests in [REP4-097] (issue EA-051) a commitment to placing all construction compounds, material storage and plant outside of flood zone 3b and more detail about the mitigation to be implemented if compounds need to be located within the floodplain. The LLFA in [REP4-091] identifies the following issues as hydrology matters currently unresolved	(REP4-049) the applicant has now included sufficient commitments to the necessary mitigation through the construction phase. We consider no additional wording is required.	phase flood risk and drainage and that no additional wording is required. The Applicant considers this confirms that the construction-phase mitigation framework, including temporary drainage, sediment control, protection of watercourse buffers and flow routes, monitoring and the Water Management Plan, is appropriately secured.

ExQ2	Question to:	Question:	Environment Agency Response	Applicant's Response
		(noting that some of those issues can arise at other phases of the development, not just during construction): • <i>whether temporary drainage and sediment control measures during construction will be sufficiently robust;</i> • <i>whether watercourse buffers and low-lying drainage pathways will</i>		

ExQ2	Question to:	Question:	Environment Agency Response	Applicant's Response
		<i>be protected in practice;</i> <i>whether site-specific hydrological sensitivities identified in the Lime Down A-E desk studies are translated into monitoring and management controls;</i> <i>whether monitoring arrangements include clear triggers, responsibilities, reporting and corrective actions.</i> The oCEMP [REP4-049] includes a		

ExQ2	Question to:	Question:	Environment Agency Response	Applicant's Response
		commitment in Table 5 to locate materials and compounds outside flood zone 3b and there is reference to monitoring requirements. Some of the other issues raised (temporary drainage, buffers) are also included in Table 5 either as standalone or as part of the WMP. <u>The EA and the LLFA:</u> Can you provide any further wording that you		

ExQ2	Question to:	Question:	Environment Agency Response	Applicant's Response
		require in the oCEMP or other dDCO documents to address the impacts of construction on flood risk and drainage?		
FHW2.8	The Applicant The Lead Local Flood Authority The Environment Agency Stop Lime Down	Construction – Water Management Plan The applicant in its rebuttal to Wiltshire Council's response to ExQ1 FHW1.9 [REP4-081] indicates that <i>The Water Management Plan forming part of the detailed CEMP</i>	1)/2) The Water Management Plan (WMP) is mentioned for water quality in Table 5: Hydrology, Flood Risk and Drainage in part 3.6 of the Outline CEMP [REP4-049] and OOEMP [REP4-052]. It includes details of pre-construction, construction, and post-construction water quality	The Applicant welcomes the Environment Agency's agreement that the Water Management Plan is appropriately secured through the Outline CEMP [REP5-071] and Outline OEMP [REP5-073] framework rather than as a separate certified document. The Applicant agrees that this avoids duplication between documents and provides a clearer and more practical framework for contractors and statutory consultees. The phase-specific approach also allows the detailed water management measures to respond to the activities and risks relevant to construction, operation and decommissioning. The Applicant's position is addressed further in FHW2.8a to FHW2.8j.

ExQ2	Question to:	Question:	Environment Agency Response	Applicant's Response
		<i>will provide the phase-specific construction drainage and exceedance arrangements. It will identify:</i> • the existing drainage features and overland flow routes relevant to the construction phase; • the proposed temporary drainage and runoff controls; • the routing of flows exceeding the capacity of temporary	monitoring. However, we believe it is appropriate for it to be approved via these documents instead of a standalone certified document. The reasoning for this is in line with other DCOs, and therefore for contractors and statutory consultees it is easier to understand in this format and it would limit the reviewing of duplicated wording across the CEMP and the WMP.	

ExQ2	Question to:	Question:	Environment Agency Response	Applicant's Response
		drainage measures; - the interaction with compounds, haul routes, stockpiles, excavations and watercourse crossings; and - the measures required to maintain existing floodplain capacity and avoid diversion of flows towards sensitive receptors. Some of the issues mentioned in the bullet points		

ExQ2	Question to:	Question:	Environment Agency Response	Applicant's Response
		above are not included in the latest oCEMP [REP4-049]. <u>All parties:</u> 1) Given that the WMP is going to be an important management plan for the duration of this project (and also referred to in the oOEMP and the outline Decommissioning Strategy (oDS)) is it still adequate that it is approved through these documents, rather than being a standalone		

ExQ2	Question to:	Question:	Environment Agency Response	Applicant's Response
		certified document? 2) If so, should it not have more overt relevance within the oCEMP, oOEMP and the oDS, possibly through the addition of a standalone section which explains its purpose, contents and links with other management plans, instead of being embedded in Table 5 of the outline management plans?		

ExQ2	Question to:	Question:	Environment Agency Response	Applicant's Response
FHW2.8	The Applicant The Lead Local Flood Authority The Environment Agency Stop Lime Down	3) If a separate WMP that covers the lifetime of the development is the best way forward, please give reasons why. Please also include information regarding the approval mechanism and consultees.	3) If it was a standalone document we would require an additional requirement to be written in which the Environment Agency would need to be a named consultee for the discharge of the requirement securing it.	The Applicant notes the Environment Agency's position and refers the EA to the Applicant's Response to Second Written Question FHW2.8 [REP5-097]. As set out in FHW2.8a to FHW2.8c, the Applicant does not consider that a standalone Water Management Plan is necessary or preferable. The phase-specific water management provisions are appropriately secured through the existing CEMP, OEMP and decommissioning management framework. At Deadline 5 the Applicant updated the Outline CEMP [REP5-071], Outline OEMP [REP5-073] and Outline Decommissioning Strategy [REP5-075] to include a section expressly explaining the relevant phase-specific water management arrangements and their relationship with the other environmental controls. Cross-referencing to reflect the relationship between water management, soil condition, erosion, sediment control and the protection of watercourses and ecological receptors were added to the Outline Soil Resources Management Plan [REP5-007] and Outline Landscape and Ecological Management Plan [REP5-079].

ExQ2	Question to:	Question:	Environment Agency Response	Applicant's Response
				Accordingly, no additional DCO Requirement or separate approval mechanism is required, and the Environment Agency would be consulted where its statutory functions are engaged through the preparation of those detailed management plans.
FHW2.8	The Applicant The Lead Local Flood Authority The Environment Agency Stop Lime Down	4) As water management will be key for other topics such as soil and ecology, should it also be referenced in the oSRMP, oEPMS and other outline management plans/strategies ? If so, please set out which ones and the reasons why.	4) Groundwater and Contaminated Land We have previously agreed the need for groundwater monitoring in relation to construction activities in our discussions with the Applicant. This includes dewatering and cable installation via Horizontal Directional Drilling methods with the monitoring needed to help identify contamination	The Applicant will add a commitment to undertake pre-construction ground investigation and associated groundwater monitoring to the Commitments Register in the next update. Further information on the design of pre-construction groundwater monitoring is presented in item WC-207. The Applicants commitment to undertaking appropriate groundwater monitoring prior to construction is captured in the Outline CEMP [REP5-071] and will be added to the Commitments Register at the next update. The Applicant also commits to consulting with the EA and Wiltshire Council on ground investigation and monitoring specification to ensure that it is compliant with appropriate standards.

ExQ2	Question to:	Question:	Environment Agency Response	Applicant's Response
			risks. They have stated that where pre-construction ground investigation identifies shallow groundwater, or where shallow groundwater could materially affect cable installation, trench stability, dewatering requirements or controlled waters receptors, groundwater observation and monitoring will be included on a risk-based basis and with reference to BS 5930. Although these controls are secured through the Outline CEMP [REP4-049] and subsequent	

ExQ2	Question to:	Question:	Environment Agency Response	Applicant's Response
			detailed CEMP, there is not a specific commitment in the Commitments Register for groundwater monitoring. A ground and surface water monitoring plan is mentioned in Table 13: Ground Conditions of the Outline CEMP but how it is reported and consulted on is not clear at this stage. It is not clear whether the ground and surface water monitoring plan will be the same as the Water Management Plan (WMP).	

ExQ2	Question to:	Question:	Environment Agency Response	Applicant's Response
			The bullet points mentioned here in relation to the WMP do not cover the groundwater monitoring activities we would expect to see for the construction activities of dewatering and cable installation. We have also recommended that a period of groundwater monitoring, in accordance with the relevant British Standards, is carried out as part of the to the ground investigation works to verify ground conditions at the site.	

ExQ2	Question to:	Question:	Environment Agency Response	Applicant's Response
FHW2.8	The Applicant The Lead Local Flood Authority The Environment Agency Stop Lime Down	Applicant's note: Question FHW2.8(4) is not repeated here. The EA's response continues from the row above.	4) Continued. Ecology The management of water is currently adequately mentioned in the Outline Ecological Protection and Mitigation Strategy (Latest Version, Revision 4 [REP4-055]). Section 7.4 (Rivers and Streams) and Section 7.5 (Ditches) mentions watercourse crossings and Section 8.2 (Precautionary Approach to HDD Works) states measures to reduce sedimentation and	The Applicant welcomes the Environment Agency's confirmation that water management is adequately addressed within the Outline EPMS [REP5-081], including the provisions relating to watercourse crossings, HDD works, drainage disruption and sediment control. This supports the Applicant's position in FHW2.8d and FHW2.8i that appropriate cross-referencing between the phase-specific water management framework and specialist management plans provides sufficient integration without duplicating dedicated Water Management Plan sections across each document.

ExQ2	Question to:	Question:	Environment Agency Response	Applicant's Response
			avoid impacts to watercourses. Section 7.5 and Section 6.2.7 mention the minimisation of drainage disruption and sediment release.	

Table 3-2 Environment Agency: Appendix 2 – Lime Down Solar Park. Lime Down E2. Hydraulic Modelling Report. July 2026. Environment Agency Flood Risk Modelling Comments ([REP4-089](#))

Reference	Comments	Applicant's Response
EA-001	We do not have any comments to make on Lime Down E2 Hydraulic Modelling Report. The approach taken aligns with our expectations in terms of methods and reporting. We are currently reviewing the corresponding hydraulic model files. To date, no significant concerns have been identified with the model construct. However, we will provide our detailed review comments to the applicant as soon as possible.	The Applicant welcomes the Environment Agency's confirmation that the Lime Down E2 Hydraulic Modelling Report [REP4-089] aligns with its expectations in terms of methodology and reporting and that no significant concerns have been identified with the model construct. The Applicant will continue to engage with the Environment Agency through completion of its detailed review.
EA-002	General comments and observations on the model report (no action required by the applicant) It is noted that maximum flood depth mapping is presented within the modelling report for the 3.33% Annual Exceedance Probability (AEP) (1 in 30 year), 1% AEP (1 in 100 year), 1% AEP plus 39% climate change (higher central allowance), and 0.1% (1 in 1000 year) AEP scenarios. The applicant has also simulated the 1% AEP plus 71% climate change (upper end allowance) scenario; however, the corresponding depth mapping and results have not been included within the modelling report. The depth	The Applicant notes the Environment Agency's observations and welcomes its confirmation that no further action is required. The 1% AEP plus Upper End climate change mapping is provided within the ES Volume 3 Appendix 11-8 Flood Risk Assessment and Drainage Strategy Lime Down E2 [REP5-059] and the Applicant agrees that duplicating the same mapping within the Hydraulic Modelling Report is unnecessary.

Reference	Comments	Applicant's Response
	mapping for the 1% AEP plus 71% climate change scenario is however included within the latest Flood Risk Assessment for Lime Down E2. On this basis it is not considered necessary to repeat this within the model report. The 0.1% AEP present-day flood extent is marginally larger than the 1% AEP plus 39% climate change scenario, but remains slightly smaller than the 1% AEP plus 71% climate change scenario.	
EA-003	A review of the hydrological inputs indicates that peak flows for the 1% AEP plus 71% climate change scenario are similar to, albeit marginally greater than, those applied to the 0.1% AEP (1 in 1,000 year) present-day scenario. An 1d-2d linked modelling approach has been adopted using ESTRY-TUFLOW software (TufLOW build 2026.2.0-iSP). This is considered reasonable. A model grid resolution of 2 metres has been adopted. This is considered reasonable and detailed.	The Applicant welcomes the Environment Agency's confirmation that the 1D-2D ESTRY-TUFLOW modelling approach and 2 m grid resolution are reasonable and appropriately detailed.
EA-004	The 2025 Flood Estimation Handbook (FEH) Statistical method has been used to determine the flood peaks to apply to the hydraulic model. These gave higher flows than the Revitalised Flood Hydrograph (ReFH2) approach and hence has been adopted on the basis of conservatism. The Flood Estimation Guidelines caution against picking a method based on conservatism alone, however, given that the catchment is ungauged, this approach is considered reasonable in the context of the proposed development.	The Applicant welcomes the Environment Agency's confirmation that the FEH Statistical method adopted for Lime Down E2 provides a reasonable basis for the assessment in the context of the ungauged catchment and proposed development.

Reference	Comments	Applicant's Response
EA-005	The following events have been simulated within the hydraulic model; the 3.3% (1 in 30) AEP scenario, the 1% (1 in 100) AEP scenario, and the 0.1% (1 in 1000) AEP scenario. Climate change uplifts of +39% and +79% have also been applied. These are reflective of the Higher Central and Upper End allowances for the 2080s epoch (2070 to 2125) for the Avon Briston and North Somerset Streams management catchment. These events are considered suitable in the context of Essential Infrastructure.	The Applicant welcomes the Environment Agency's confirmation that the range of design events and climate change scenarios simulated within the Lime Down E2 hydraulic model is suitable for the assessment.
EA-006	Only baseline modelling has been undertaken. Proposed "with development" modelling has not been undertaken. This is considered appropriate as there is no land raising within the modelled flood extents. The only development within the modelled flood extents are the solar panel support columns. Table 1 and 2 of the accompanying Flood Risk Assessment for Lime Down E2 note a total of 14 support columns within the 0.1% (1 in 1000) annual exceedance probability extent and a displaced volume of well below 1 cubic metre. It is therefore not considered necessary to undertake proposed "with development" modelling of the solar panel support frames. Their impact has already been assessed through volumetric analysis which is considered appropriate.	The Applicant welcomes the Environment Agency's confirmation that baseline-only hydraulic modelling is appropriate for Lime Down E2 and that separate with-development modelling is not required. As recognised by the Environment Agency, no land raising is proposed within the modelled flood extent and the only Scheme infrastructure within that extent comprises discrete Solar PV Panel support columns. The volumetric assessment within the ES Volume 3 Appendix 11-8 Flood Risk Assessment and Drainage Strategy Lime Down E2 [REP5-059] demonstrates that displacement is well below 1 m³. The Applicant welcomes the Environment Agency's confirmation that this volumetric assessment is an appropriate and proportionate means of assessing

Reference	Comments	Applicant's Response
		the potential effect of the Scheme on floodplain storage.
EA-007	The modelled flood extents compare well with the existing Flood Map for Planning dataset, providing additional confidence that the model is reasonably representing the dominant flood risk mechanisms associated with the Rodbourne Brook.	The Applicant welcomes the Environment Agency's confirmation that the modelled flood extents compare well with the existing Flood Map for Planning and provide additional confidence that the hydraulic model reasonably represents the dominant flood risk mechanisms associated with Rodbourne Brook.

Table 3-3 Environment Agency: Appendix 3 – Updated comments and position on the issues raised in our Relevant Representation / Written Representation / Examination responses following review of documents submitted at Deadline 4

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 4 submissions	Applicant's Response
EA-001- EA-011s summarise the issues below	See below	See below	NA	N/A
EA-012	REP4-004 3.1 Draft Development Consent Order (Rev 4)	Disapplying Flood Risk Activity Permits	Agree in principle We have now agreed in principle to the applicant's request to disapply the need for Flood Risk Activity Permits under the Environmental Permitting (England and Wales) Regulations 2016; based on the information in REP1- 126 9.10 ES Volume 3	The Applicant has reviewed the protective provisions for the Environment Agency in light of the comments made. The only substantive difference is regarding the inclusion of the following in respect of the indemnity clause "The undertaker indemnifies the Agency in respect of all costs, charges and expenses which the Agency may <i>reasonably incur</i> ". The Applicant considers this an appropriate inclusion. The rest of the differences relate to cross referencing in order to reflect the incorporation of the protective provisions into the Draft DCO [REP5-012] .

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 4 submissions	Applicant's Response
			Appendix 9-9 Watercourse Crossing Schedule and subject to the inclusion of our standard protective provisions in the Development Consent Order. We note the applicant has made changes to make the protective provisions in accordance with our standard protective provisions in the 3.1 Draft Development Consent Order (Rev 4). We are satisfied with the use of the	

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 4 submissions	Applicant's Response
			<i>Order Limits</i> rather than <i>Limits of Deviation</i> in 96 <i>maintenance of works</i> as Lime Down does not have any Limits of Deviation. However, there are still some minor discrepancies which we require to be amended in accordance with our standard protective provisions set out in Appendix 4 for consistency. For example in <i>works not in accordance with the schedule 95; 96 maintenance of works, agency access 98 and free passage of fish 99.</i>	

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 4 submissions	Applicant's Response
			<i>Please can these be corrected.</i>	
EA-013	REP3-006 3.1 Draft Development Consent Order (Rev 3)	Requirement 13 Construction environmental management plan (CEMP)	Agree- as per Deadline 4 response.	The Applicant notes that this issue is agreed.
EA-014	REP3-006 3.1 Draft Development Consent Order (Rev 3)	Requirement 14 Operational environmental management plan (OEMP)	Agree as per Deadline 4 response.	The Applicant notes that this issue is agreed.
EA-015	REP1-008 3.1 Draft Development Consent Order (Rev 2)	Requirement 17 Soil Management	Agreed- As per Deadline 2 response.	The Applicant notes that this issue is agreed.
EA-016	Fisheries	Fish species protection	Agreed- As per Deadline 2 response.	The Applicant notes that this issue is agreed.
EA-017	Fisheries, Biodiversity and Geomorphology	Watercourse Crossings	Agreed- As per Deadline 2 response.	The Applicant notes that this issue is agreed.
EA-013	REP3-006 3.1 Draft Development	Requirement 13 Construction environmental	Agree- as per Deadline 4 response.	The Applicant notes that this issue is agreed.

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 4 submissions	Applicant's Response
	Consent Order (Rev 3)	management plan (CEMP)		
EA-014	REP3-006 3.1 Draft Development Consent Order (Rev 3)	Requirement 14 Operational environmental management plan (OEMP)	Agree as per Deadline 4 response.	The Applicant notes that this issue is agreed.
EA-015	REP1-008 3.1 Draft Development Consent Order (Rev 2)	Requirement 17 Soil Management	Agreed- As per Deadline 2 response.	The Applicant notes that this issue is agreed.
EA-016	Fisheries	Fish species protection	Agreed- As per Deadline 2 response.	The Applicant notes that this issue is agreed.
EA-017	Fisheries, Biodiversity and Geomorphology	Watercourse Crossings	Agreed- As per Deadline 2 response.	The Applicant notes that this issue is agreed.
EA-013	REP3-006 3.1 Draft Development Consent Order (Rev 3)	Requirement 13 Construction environmental management plan (CEMP)	Agree- as per Deadline 4 response.	The Applicant notes that this issue is agreed.
EA-014	REP3-006 3.1 Draft Development	Requirement 14 Operational environmental	Agree as per Deadline 4 response.	The Applicant notes that this issue is agreed.

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 4 submissions	Applicant's Response
	Consent Order (Rev 3)	management plan (OEMP)		
EA-015	REP1-008 3.1 Draft Development Consent Order (Rev 2)	Requirement 17 Soil Management	Agreed- As per Deadline 2 response.	The Applicant notes that this issue is agreed.
EA-016	Fisheries	Fish species protection	Agreed- As per Deadline 2 response.	The Applicant notes that this issue is agreed.
EA-017	Fisheries, Biodiversity and Geomorphology	Watercourse Crossings	Agreed- As per Deadline 2 response.	The Applicant notes that this issue is agreed.
EA-018	Fisheries, Biodiversity and Geomorphology	Commitments register: mitigation	Agreed- As per Deadline 2 response.	The Applicant notes that this issue is agreed.
EA-019	Fisheries, Biodiversity and Geomorphology	Ecological assessments	Agree- As per Deadline 2 response.	The Applicant notes that this issue is agreed.
EA-020	Fisheries, Biodiversity and Geomorphology	Aquatic invertebrates	Agree- As per Deadline 2 response.	The Applicant notes that this issue is agreed.
EA-021	Fisheries, Biodiversity and Geomorphology	Watercourse buffers	Agree We have now agreed with the applicant's proposal	The Applicant notes that this issue is agreed.

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 4 submissions	Applicant's Response
			to maintain a minimum 8 metre watercourse buffer from ditches, following our request to provide a minimum 10 metre watercourse buffer. This was based on a discussion with the applicant dated 28th July 2026, and a review of Confidential Appendix 9-8 (Schedule of Protective Ecological Buffers APP-205) provided by the applicant. This provided us with the assurance that watercourse riparian zones were being adequately	

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 4 submissions	Applicant's Response
			considered, and the measures proposed were proportionate. The applicant has updated the most recent iteration of the Outline Construction Environmental Management Plan (REP4-049) , to a 15m buffer where biosecurity risks or sensitivities have been identified.	
EA-022	Water Framework Directive	Groundwater Bodies	Agree -as per Deadline 4 response.	The Applicant notes that this issue is agreed.
EA-023	Groundwater and Contaminated Land	Piling	Agree -as per Deadline 4 response	The Applicant notes that this issue is agreed.
EA-024	Groundwater and Contaminated Land	Battery Energy Storage System (BESS) foundation solution	Agree - as per Deadline 4 response.	The Applicant notes that this issue is agreed.

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 4 submissions	Applicant's Response
EA-025	Groundwater and Contaminated Land	Fire water supply and storage within the Outline Battery Safety Management Plan (oBSMP)	Agree- as per Deadline 2 response.	The Applicant notes that this issue is agreed.
EA-026	Groundwater and Contaminated Land	Ground infrastructure will be left in-situ following the decommissioning phase	Agree- as per Deadline 2 response.	The Applicant notes that this issue is agreed.
EA-027	Groundwater and Contaminated Land	Suitable mitigation where groundwater may be encountered.	Agree- as per Deadline 4 response.	The Applicant notes that this issue is agreed.
EA-028	Groundwater and Contaminated Land	Per-and poly fluoroalkyl substances (PFAS) based materials	Agree- as per Deadline 2 response.	The Applicant notes that this issue is agreed.
EA-029	Groundwater and Contaminated Land	Licensed groundwater abstractions	Agree- as per Deadline 4 response.	The Applicant notes that this issue is agreed.

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 4 submissions	Applicant's Response
EA-030	Groundwater and Contaminated Land	Thermal implications of cables	Under discussion The applicant has stated that our advice regarding thermal impacts of cables has been noted and will be referenced in future submissions of ES Volume 1 Chapter 19 Ground Conditions (Rev 3) [REP3-023] and that detailed assessment of thermal impacts will be made once location-specific hydrogeological data is available from ground investigations to be completed prior to the construction phase.	The Applicant can confirm that the guidance provided by the EA has been noted and this is now reflected in Section 19.11.10 of 6.1 ES Volume 1 Chapter 19 Ground Conditions [REP5-026] as per the edits made at Deadline 5. The applicant has provided a more detailed commentary around thermal impacts at DCO2.1 above. To briefly summarise, the Applicant maintains that a formal, standalone thermal impact assessment for the cable route is not required, as the potential for significant adverse environmental effects from incidental cable heat loss is Very Low. Please refer to the response at DCO2.1 for more information regarding justification on this point. The applicant clarifies that "micro-routing" of cables is intended to include both horizontal and vertical routing within the ground, dependent on where

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 4 submissions	Applicant's Response
			Our comments from the previous deadline therefore remain valid. We may be able to resolve this issue if a commitment to secure assessment of thermal impacts, and route the cables accordingly, prior to construction can be included in the Construction Environment Management Plan ES Volume 1 Chapter 19 Ground Conditions (Rev 3) [REP3-023] has been updated, including sections 19.10.2 and 19.11.10.	groundwater is encountered during ground investigation. This confirmation of the nature of micro-routing exercise was also added at Deadline 5. For clarity a commitment to a groundwater monitoring plan following ground investigation to be developed in line with best practice including Groundwater protection technical guidance - GOV.UK has been included within the Outline CEMP [EN010168/APP/7/12] (Revision 7) submitted at Deadline 6.

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 4 submissions	Applicant's Response
			19.10.2 states that "Micro routing of the cable will ensure that no cables are located within 50m of abstractions or GWDTE or within SPZ1." Cable Route Southwest lies within a Source Protection Zone 1 (SPZ1). It is not clear how the micro-routing will ensure that no cables are within SPZ1. Section 19.11.10 makes no reference to avoiding SPZ1. The Applicant has not demonstrated adherence to the conditions set out in the advice note we	

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 4 submissions	Applicant's Response
			sent in February 2026. This includes proximity to SPZ1 and springs. More detail is required to demonstrate that the cables will not interact with these sensitive receptors. This should include depth to groundwater and anticipated ground conditions in sensitive groundwater areas.	
EA-031	Groundwater and Contaminated Land	The Battery Energy Storage System (BESS) Area drainage outfall automatically self-actuating valves	Agree- as per Deadline 2 response.	The Applicant notes that this issue is agreed.
EA-032	Groundwater and Contaminated Land	Ground conditions	Agree- as per Deadline 4 response.	The Applicant notes that this issue is agreed.

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 4 submissions	Applicant's Response
EA-033	Groundwater and Contaminated Land	Discovery and Inspection Strategy	Agree- as per Deadline 2 response.	The Applicant notes that this issue is agreed.
EA-034	Groundwater and Contaminated Land	Inconsistency in the walkover surveys carried out.	Agree- as per Deadline 4 response.	The Applicant notes that this issue is agreed.
EA-035	Groundwater and Contaminated Land	Soil contamination during the operational phase.	Agree- as per Deadline 4 response.	The Applicant notes that this issue is agreed.
EA-036	Groundwater and Contaminated Land	Groundwater risks have not been appropriately assessed.	Agree- as per Deadline 4 response.	The Applicant notes that this issue is agreed.
EA-037	Groundwater and Contaminated Land	Storage and management proposals for batteries have not been provided.	Agree- as per Deadline 2 response.	The Applicant notes that this issue is agreed.
EA-038	Groundwater and Contaminated Land	Mitigation proposals managing risks to groundwater have not been adequately addressed.	Agree- as per Deadline 4 response.	The Applicant notes that this issue is agreed.

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 4 submissions	Applicant's Response
EA-039	Groundwater and Contaminated Land	No Preliminary Risk Assessments (PRAs) for the interconnecting corridors between the main	Agree- as per Deadline 4 response.	The Applicant notes that this issue is agreed.
EA-040	Groundwater and Contaminated Land	Maps and data searches in appendices 19-1, 19-2 and 19-5 are not complete or specific to those sites	Agree- as per Deadline 4 response.	The Applicant notes that this issue is agreed.
EA-041	Groundwater and Contaminated Land	The PRA reports do not refer to the proposed Discovery and Inspection Strategy	Agree As per Deadline 2 response.	The Applicant notes that this issue is agreed.
EA-042	Groundwater and Contaminated Land	PRA- off-site vehicle repair garage	Agree As per Deadline 2 response.	The Applicant notes that this issue is agreed.
EA-043	Groundwater and Contaminated Land	Unclear whether ground investigation to confirm the	Agree As per Deadline 2 response.	The Applicant notes that this issue is agreed.

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 4 submissions	Applicant's Response
		conceptual model is proposed to be carried out for several parts of the Proposed		
EA-044	Groundwater and Contaminated Land	Justification for selecting the distances beyond which off site contamination sources would not be significant.	Agree As per Deadline 2 response.	The Applicant notes that this issue is agreed.
EA-045	Groundwater and Contaminated Land	Monks Park Mine	Agree- as per Deadline 4 response	The Applicant notes that this issue is agreed.
EA-046	Groundwater and Contaminated Land	No drainage strategies are provided for the proposed 400kV and 132kV Substations.	Agree- as per Deadline 4 response.	The Applicant notes that this issue is agreed.
EA-047	Groundwater and Contaminated Land	Present the SuDS options with consideration of the	Agree As per Deadline 2 response.	The Applicant notes that this issue is agreed.

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 4 submissions	Applicant's Response
		need for sealed drainage.		
EA-048	Groundwater and Contaminated Land	Table 4: SuDS Mitigation Indices is blank.	Agree As per Deadline 4 response.	The Applicant notes that this issue is agreed.
EA-049	Flood Risk Assessment	Functional Floodplain (Flood Zone 3b).	Under Discussion We welcome the addition of the 3.3% (1 in 30) annual exceedance probability scenario flood depth and extent mapping for the Gauze Brook. Lime Down E2 Model is under review- please see Appendix 2.	The Applicant welcomes the Environment Agency's acknowledgement of the additional 3.3% AEP flood depth and extent mapping for Gauze Brook. The remaining modelling matters are addressed in FHW2.3 and EA-001 to EA-007.
EA-050	Flood Risk Assessment	Fencing must not inhibit flood flow routes.	Agree - as per Deadline 4 response.	The Applicant notes that this issue is agreed.
EA-051	Flood Risk Assessment	No assessment of the impacts the construction phase	Agree This can be moved to resolved as the	The Applicant notes that this issue is agreed.

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 4 submissions	Applicant's Response
		of the development will have on flood risk.	applicant has now included text in the Outline Construction Environmental Management Plan (REP4-050) which confirms all material storage and construction compounds will be placed outside of Flood Zone 3b.	
EA-052	Flood Risk Assessment	It is not clear what freeboard allowances are proposed.	Agree Lime Down Solar Park. Environmental Statement Volume 3. Appendix 11-1: Flood Risk Assessment and Outline Drainage Strategy – Lime Down Covering	The Applicant notes that this issue is agreed.

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 4 submissions	Applicant's Response
			Report. July 2026 (REP4-022) Section 3.2.1 Embedded Mitigation page 22 notes that where solar PV panels are located within the design flood extent, the lowest leading edge of the panels will be set to no less than 600mm above the design flood level. This is agreed.	
EA-053	Flood Risk Assessment	Hydraulic model files for the Gauze Brook have not been reviewed.	Under Discussion The applicant has provided the hydraulic model files for the Gauze Brook and we have reviewed the modelling. The peak flows presented in	The Applicant notes the Environment Agency's comments. The Gauze Brook hydrological assessment was revisited when the additional 3.3% AEP event was incorporated, with the assessment undertaken afresh to provide a consistent and auditable set of design flows across all modelled events. This

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 4 submissions	Applicant's Response
			Table 3 of the updated model report (June 2026) differ from those reported in the previous model report (April 2026). A reduction in the Gauze Brook design flow estimates has been identified in the updated submission. The reason for this change is not explained. In the absence of any justification or revised hydrological assessment, it would be expected that the design flows remain unchanged from the previous submission.	resulted in slightly lower peak flow estimates than those previously reported and these revised flows supersede the earlier values. The revised hydrological assessment, supporting Flood Estimation Calculation Record and updated hydraulic model files were submitted at Deadline 5 within the updated Lime Down D - Hydraulic Modelling Report [REP5-095]. These provide the information requested by the Environment Agency to verify the adopted design flows. The change in peak flows is minor and does not materially alter the hydraulic modelling conclusions or the assessment of flood risk.

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 4 submissions	Applicant's Response
			As noted in the previous model review comments, the corresponding Flood Estimation calculation record should be provided to enable verification of the peak flows applied within the hydraulic model. The applicant has indicated they will submit updated modelling at Deadline 5 for our review.	
EA-054	Flood Risk Assessment	It is not clear how the analysis extent area of 275,000m ² has been derived.	Agreed. As per Deadline 2 response.	The Applicant notes that this issue is agreed.

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 4 submissions	Applicant's Response
EA-055	Flood Risk Assessment	Impacts of the solar panel support frames on flood flow conveyance is not discussed. Lime Down D/BESS	Agree Lime Down Solar Park. Environmental Statement Volume 3. Flood Risk Assessment and Outline Drainage Strategy – Lime Down D/BESS. July 2026 (REP4-032) Section 2.3.19 notes that where solar PV panels are located within the design flood extent the lowest leading edge of the panels will be no less than 600mm above the design flood level. This is agreed. No other comments at this stage. The	The Applicant welcomes the Environment Agency's agreement with the 600 mm freeboard commitment for Solar PV Panels within the design flood extent. Any consequential updates arising from the final Gauze Brook modelling will be incorporated into the relevant Lime Down D flood risk documentation as required.

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 4 submissions	Applicant's Response
			Gauze Brook runs through Lime Down D and is subject to ongoing hydraulic modelling updates and hence there may be a requirement to update some of the figures and information within the Flood Risk Assessment once this modelling is finalised.	
EA-056	Flood Risk Assessment	It is not clear how the analysis extent area of 175,580m2 has been derived.	Agreed As per Deadline 2 response.	The Applicant notes that this issue is agreed.
EA-057	Flood Risk Assessment	Impacts of the solar panel support frames on flood flow conveyance is not discussed. Lime Down E2	Under Discussion Lime Down E2 Model is under review- please see Appendix 2.	The Applicant notes the Environment Agency's position. The subsequent review of the Lime Down E2 hydraulic model within the Lime Down E2 – Hydraulic Modelling Report [REP4-089] is addressed in EA-001 to EA-007.

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 4 submissions	Applicant's Response
EA-058	Outline Decommissioning Strategy	No clear commitment to the production of an outline or detailed Decommissioning Environmental Management Plan.	Agreed As per Deadline 2 response.	The Applicant notes that this issue is agreed.
EA-059	Cable Route Construction Method Statement	Cable Route Construction Method Statement	Agree We note the amendment to the Outline Construction Environmental Management Plan [REP2-019] to include reference to the discovery strategy and updates to Table 13 in relation to the proposed ground investigation. Appendix 3-2 Cable Route	The Applicant notes that this issue is agreed.

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 4 submissions	Applicant's Response
			Construction Method Statement [REP4-040] has been updated to include reference to the discovery strategy.	
EA-060	Biodiversity Net Gain	Trading Rules	Agree As per Deadline 2 response.	The Applicant notes that this issue is agreed.
EA-061	Biodiversity Net Gain	Full Biodiversity Net Gain Metric has not been provided.	Agree- As per Deadline 2 response.	The Applicant notes that this issue is agreed.
EA-062	Outline Landscape and Ecological Management Plan	Planting strategy misses opportunities to enhance the environment.	Agree- As per Deadline 2 response.	The Applicant notes that this issue is agreed.
EA-063	Water Framework Directive Assessment	Change the description from "Supports Good" to "Not High" and possibly add an explanation.	Agree As per Deadline 2 response.	The Applicant notes that this issue is agreed.

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 4 submissions	Applicant's Response
EA-064	Water Framework Directive Assessment	The assessment does not identify or discuss Groundwater Dependent Terrestrial Ecosystems (GWDTEs)	Agree As per Deadline 2 response.	The Applicant notes that this issue is agreed.
EA-065	Water Framework Directive Assessment	Subsurface infrastructure such as the Cable Corridor could impact the status of WFD Groundwater Bodies and should not be excluded from assessment.	Agree As per Deadline 2 response.	The Applicant notes that this issue is agreed.
EA-066	Outline Battery Safety Management Plan	Provide details of the products to be used in the proposed liquid cooling systems, and the means by which it will be contained, captured and disposed.	Agree As per Deadline 2 response.	The Applicant notes that this issue is agreed.

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 4 submissions	Applicant's Response
EA-067	Outline Battery Safety Management Plan	Provide more detail about the inspection and maintenance frequency and protocols for key controls at the BESS site.	Agree As per Deadline 2 response.	The Applicant notes that this issue is agreed.
EA-068	Outline Battery Safety Management Plan	No details are provided of the proposed testing suite or sampling protocol for potentially contaminated firewater captured at the BESS in a fire event.	Agree As per Deadline 2 response.	The Applicant notes that this issue is agreed.
EA-069	Outline Battery Safety Management Plan	It is not clear whether the proposed lining of the drainage system at the BESS would be impermeable.	Agree As per Deadline 2 response.	The Applicant notes that this issue is agreed.

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 4 submissions	Applicant's Response
EA-070	Outline Construction Environmental Management Plan	Water Quality Mitigation Measures are insufficient	Agree As per Deadline 4 response. 1.	The Applicant notes that this issue is agreed.
EA-071	Outline Site Waste Management Plan	No inclusion that waste will be assessed in accordance with Waste Technical Guidance WM3	Agree As per Deadline 2 response.	The Applicant notes that this issue is agreed.
EA-072	Permitting	Permitting Informative	Agree	The Applicant notes that this issue is agreed.
EA-073	Flood Risk Assessment	Compensatory flood storage	Under Discussion. If it is not possible to place the substation within Lime Down C1 outside of the mapped flood flow routes, further assessment will need to be undertaken at detailed design to determine if the	Please refer to the Applicant's Response to the Examining Authority's Second Written Questions [REP5-097] FHW2.5 on this matter at page 205.

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 4 submissions	Applicant's Response
			placement of the substation within Lime Down C1 would increase flood risk elsewhere. If there is an increase to flood risk elsewhere, floodplain compensation will be provided, in consultation with the Environment Agency, to ensure that there is no increase in flood risk. Engagement with the Environment Agency will occur throughout the detailed design stage on the need, method of calculating volumes,	

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 4 submissions	Applicant's Response
			modelling and design of any floodplain compensation that may be required. We would need to secure this through a requirement within the Development Consent Order. We would request the following wording to secure this: Flood Mitigation Requirement <i>No development shall take place within Lime Down C1 until the location of the substation has been confirmed, an assessment of flood risk has been undertaken and a mitigation plan have</i>	

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 4 submissions	Applicant's Response
			<i>been submitted to, and approved in writing by, the Local Planning Authority, in consultation with the Environment Agency, and these works shall be carried out as approved.</i> <i>Note:</i> <i>Should the assessment show increased flood risk, the mitigation plan should include a Floodplain Compensation Scheme.</i> <i>Any proposed compensation scheme must demonstrate:</i> <i>a) no net loss of floodplain storage</i>	

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 4 submissions	Applicant's Response
			<i>within the design flood event;</i> <i>b) compensation provided on a level-for-level and volume-for-volume basis where appropriate;</i> <i>c) no increase in flood risk elsewhere;</i> <i>d) implementation of compensatory storage prior to the associated floodplain loss; and</i> <i>e) appropriate maintenance of the compensation scheme is in place during the operation phase.</i>	
EA-074	Outline Landscape and Ecological Management	Herbicide use	Agree- as per Deadline 4 response.	The Applicant notes that this issue is agreed.

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 4 submissions	Applicant's Response
EA-075	Outline Ecological Protection and Mitigation Strategy	Improvements to document	Agree As per Deadline 2 response.	The Applicant notes that this issue is agreed.
EA-076	Firewater Drainage	Detail of fire water management. A standalone drainage plan is strongly recommended.	Agree As per Deadline 2 response.	The Applicant notes that this issue is agreed.
EA-077	BESS and Substation Drainage	Proposed drainage layout for the BESS and 400kv Substation development.	Agree As per Deadline 2 response.	The Applicant notes that this issue is agreed.
EA-078	Lime Down E Desk Study	former RAF airfield at Hullavington.	Agree As per Deadline 2 response.	The Applicant notes that this issue is agreed.
EA-079	outline Battery Safety Management Plan	Battery replacements	Agree As per Deadline 2 response.	The Applicant notes that this issue is agreed.
EA-080	Intrusive Ground Investigations	Intrusive Ground Investigations	Agree As per Deadline 2 response.	The Applicant notes that this issue is agreed.

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 4 submissions	Applicant's Response
EA-081	Decomissioning	Decomissioning of cables	Agree As per Deadline 2 response.	The Applicant notes that this issue is agreed.
EA-082	Ground Investigations	Purpose, scope and extent of ground investigations	Agree As per Deadline 2 response.	The Applicant notes that this issue is agreed.
EA-083	Battery Safety Management Plan	Manual isolation of BESS systems	Agree As per Deadline 2 response.	The Applicant notes that this issue is agreed.
EA-084	Battery Safety Management Plan	Battery storage infrastructure should not be delivered to site before all firewater containment arrangements are installed and commissioned.	Agree As per Deadline 2 response.	The Applicant notes that this issue is agreed.
EA-085	Battery Safety Management Plan	Emergency Response Plan	Agree As per Deadline 2 response.	The Applicant notes that this issue is agreed.
EA-086	Foundation Design	Piling Risk Assessment references	Agree As per Deadline 2 response.	The Applicant notes that this issue is agreed.

EA RR ID Ref in PDA-009	Issue	Topic (s)	Environment Agency Updated Position following Deadline 4 submissions	Applicant's Response
EA-087	Commitments Register	Horizontal Directional Drilling	Agree As per Deadline 2 response.	The Applicant notes that this issue is agreed.
EA-088	Commitments Register	Siting of construction compounds and stockpiles	Agree As per Deadline 2 response.	The Applicant notes that this issue is agreed.
EA-089	Commitments Register	Plant maintenance	Agree As per Deadline 2 response.	The Applicant notes that this issue is agreed.
EA-090	Commitments Register	Breakout contingency procedures	Agree As per Deadline 2 response.	The Applicant notes that this issue is agreed.
EA-091	Commitments Register	Per- and polyfluoroalkyl substances (PFAS)	Agree - As per Deadline 2 response.	The Applicant notes that this issue is agreed.
EA-092	Commitments Register	BESS and substation drainage infrastructure	Agree As per Deadline 2 response.	The Applicant notes that this issue is agreed.
EA-093	Commitments Register	Hydrological risk assessment	Agree As per Deadline 2 response.	The Applicant notes that this issue is agreed.

EA Written Rep (WR) REP1-151 ID Ref in REP2-039	Issue	Topic (s)	Environment Agency Updated Position following Deadline 4 submissions	Applicant's Response
WR EA-001	Ecology and Biodiversity	Biodiversity Net Gain	Agree	The Applicant notes that this issue is agreed.
WR EA-002	Draft DCO	"Substantially in accordance with" requirements	Under Discussion We maintain our previous position set out in our written representation REP1-151	The Applicant notes this comment and maintains its position that "substantially in accordance" is appropriate and standard wording.
WR EA-003	Draft DCO Soil Management	Requirement 17	Agree	The Applicant notes that this issue is agreed.
WR EA-004	Draft DCO	Procedure for Discharge of Requirements	Under Discussion We note the increase in timeframe but request the full 15 working days consultation period as set out in our written representation REP1-151	The Applicant maintains, as set out in its response to the Environment Agency's Written Representation in Applicant's Response to Written Representations [REP2-039] (page 257) that the timeframes now included in Schedule 16 are appropriate and notes these were already increased by 5 working days at the request of Wiltshire Council. The Applicant notes that, as drafted, Schedule 16 does not prescribe a fixed consultee response period. This approach allows the relevant planning authority to manage the discharge process flexibly as

EA Written Rep (WR) REP1-151 ID Ref in REP2-039	Issue	Topic (s)	Environment Agency Updated Position following Deadline 4 submissions	Applicant's Response
				they see fit, proportionate to the matter to be consulted on.
WR EA-005	Water Quality	Foul Drainage	Agree -as per Deadline 3 response.	The Applicant notes that this issue is agreed.
WR EA-006	Water Quality	Water Quality Monitoring	Agree - as per Deadline 4 response.	The Applicant notes that this issue is agreed.
WR EA-007	Water Quality	Vehicle washdown and refuelling areas	Agree -as per Deadline 3 response.	The Applicant notes that this issue is agreed.
WR EA-008	Water Quality	Concrete management	Agree - as per Deadline 3 response.	The Applicant notes that this issue is agreed.
WR EA-009	Water Quality	Sediment control and SuDS	Agree - as per Deadline 3 response.	The Applicant notes that this issue is agreed.
WR EA-010	Water Quality	Fuels, oils and chemical storage	Agree - as per Deadline 4 response.	The Applicant notes that this issue is agreed.
WR EA-011	Water Quality	Wheel wash water disposal	Agree - as per Deadline 3 response.	The Applicant notes that this issue is agreed.

EA Written Rep (WR) REP1-151 ID Ref in REP2-039	Issue	Topic (s)	Environment Agency Updated Position following Deadline 4 submissions	Applicant's Response
WR EA-012	Water Quality	Outline Decommissioning Strategy	Agree- as per Deadline 3 response.	The Applicant notes that this issue is agreed.
WR EA-013	Water Quality	Watercourse buffers	Agree - as per Deadline 3 response.	The Applicant notes that this issue is agreed.
WR EA-014	Water Quality	Horizontal Directional Drilling (HDD) and Per- and polyfluoroalkyl substances (PFAS)	Agree- as per Deadline 3 response.	The Applicant notes that this issue is agreed.
WR EA-015	Statement of Common Ground	Statement of Common Ground	Under Discussion The next version of the Statement of Common Ground will be submitted at Deadline 6.	The Applicant will submit a revised Statement of Common Ground with Environment Agency [EN010168/EXAM/8.6] at Deadline 6.

EA Deadline 4 response REP4-097	Issue	Topic	Environment Agency Updated Position following Deadline 4 submissions	Applicant's Response
Issues raised as part of Deadline 4 Response				
Action 25	Cable Route Corridor	Species surveys	Under Discussion The applicant has provided further clarity around their planned pre-commencement surveys, and has agreed to update the Outline Ecological Protection and Mitigation Strategy [REP4-055]). Subject to a review of the updated document, this would satisfy our concerns regarding survey work.	The Applicant confirms that an updated version of the Outline EPMS [REP5-082] was submitted at Deadline 5 to address Environment Agency's concerns.
Action 25	Fisheries	Outline Construction Environmental Management Plan	Under Discussion The document has not been updated in accordance with the	The Applicant confirms that an updated version of the Outline CEMP [REP5-071] was submitted at Deadline

EA Deadline 4 response REP4-097	Issue	Topic	Environment Agency Updated Position following Deadline 4 submissions	Applicant's Response
			additional commitment we have requested.	5 and includes text relating to fish rescue permissions.

Applicant's note: The Environment Agency's standard protective provisions are provided at Appendix 4 of its submission. Where relevant, these are addressed in the Applicant's Response to the specific comments above.

3.2 Cotswolds National Landscape Board

Table 3-4 Cotswolds National Landscape Board: The Board's responses to the Examining Authority's Second Written Questions and requests for information

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
CNLB-001	Ecology and Biodiversity Landscape and Visual	ExQ2 LV2.1: Time Limited Enhancements	The Examining Authority issued its Second Written Questions and requests for information (ExQ2) on 27 July 2026, two of which were directed to the Board along with other parties. These two comprised: <i>ExQ2 LV2.1: Time Limited Enhancements</i> <i>The applicants stated in its response to ExQ1 LSF1.1 [REP3-128] that there are no significant permanent effects on agricultural land, as all land will be returned to its original use and condition as far as practicable following decommissioning. The creation of wildflower meadows within fields A1, C1, C6, C8, C9 and B12 and the creation of wildflower meadow verges in A11, A12 and C10 are relied on by the applicant as beneficial effects to further the purposes of the Cotswolds National Landscape (CNL). The ExA</i>	The Applicant notes this comment regarding decommissioning. The Applicant notes that, whilst the reversion of all land within the Solar PV Sites to its original use as far as practicable has been assumed for the purposes of the assessment, it is possible that certain areas of the Solar PV Sites, including wildflower meadow, may be retained due to their ecological value, as set out within Section 9.11 of ES Volume 1, Chapter 9: Ecology and Biodiversity [REP4-010] and Table 3 of the Outline Decommissioning Strategy [REP5-075], and accordance with the prevailing legislation, policy and guidance in place at the time. Decommissioning measures are to be secured within the detailed Decommissioning Strategy, including surveys of habitats at the Solar PV Sites to identify potential ecological constraints.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<i>understands that these enhancement measures are therefore time limited and removed at decommissioning.</i> <u><i>The Applicant:</i></u> <i>1) The applicant is asked to confirm if the ExA's understanding is correct.</i> <u><i>The Applicant, Wiltshire Council, Natural England and the CNLB:</i></u> <i>2) The parties are asked to comment on whether a time limited enhancement can be relied on to seek to further the purpose of conserving and enhancing the natural beauty of the national landscape under section (s) 85 of the Countryside and Rights of Way Act 2000 (as amended) (CRoW Act)?</i> <i>3) If enhancements are removed at decommissioning, would that then be considered a harm to the purposes of the Cotswolds National Landscape at decommissioning?</i> CNLB Response: <i>2) If the ExA's understanding is correct, it is disappointing that land</i>	

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			proposed for wildflower meadow creation will be returned to its original use and condition following decommissioning.	
CNLB-002	Ecology and Biodiversity Landscape and Visual	ExQ2 LV2.1: Time Limited Enhancements	However, the Board considers that a time-limited enhancement can be relied upon to seek to further the purpose of conserving and enhancing the natural beauty of the CNL under section 85 of the CRow Act as there is no specific requirement within the wording of the Act or supporting DEFRA guidance for enhancements to be permanent. Notwithstanding, the weight that the Secretary of State (as the 'Relevant Authority') should attribute to such measures should be reduced compared to a permanent habitat enhancement. Assessment of proposed mitigation and enhancement measures should still consider whether they actively, reasonably, appropriately and proportionately further the statutory purpose of the CNL during their lifespan.	The Applicant notes and welcomes confirmation from the CNLB that a time-limited enhancement can be relied upon to seek to further the purpose of conserving and enhancing the natural beauty of the CNL under section 85 of the CRow Act and that there is no specific requirement within the wording of the Act or supporting DEFRA guidance for enhancements to be permanent. The CNLB in their document submitted into Examination, Comments on any other submissions received at deadline 2 [REP3-154], acknowledge that the Applicant has sought to further the purposes of the CNL: <i>"...the Applicant has sought to further its natural beauty through the proposed enhancement measures located in the setting of the CNL, including some of those outlined at Table 19 of ES Appendix 8-6 such as 60 hectares of</i>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				<i>wildflower meadow and 63 hectares of set aside for ground nesting birds. These would comprise enhancements to the CNL's setting above and beyond the current baseline condition on land which is visually connected to, and has a complementary landscape character to, the adjacent CNL."</i>
CNLB-003	Ecology and Biodiversity Landscape and Visual	ExQ2 LV2.1: Time Limited Enhancements	In coming to this conclusion, the Board has had regard to the wording of section 85 of the CRow Act, DEFRA's 'Guidance for relevant authorities on seeking to further the purposes of Protected Landscapes' (published 16 December 2024) and the briefing note published by the National Landscapes Association 'Applying the CRow Act section 85 duty to 'seek to further the purpose' in National Landscapes (AONBs)' (published May 2025).	The Applicant notes this comment.
CNLB-004	Ecology and Biodiversity Landscape and Visual	ExQ2 LV2.1: Time Limited Enhancements	The wording of the DEFRA guidance states that in seeking to further the statutory purpose of a National Landscape, the 'relevant authority' should seek measures that are active, appropriate, reasonable and proportionate as well as forming an	The Applicant notes this comment and directs its response to CNLB-002 above.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			evidence-based approach to landscape and nature recovery, informed by the relevant Protected Landscape Management Plan. Whilst the Board considers that permanent enhancements should be sought, nothing in the wording of the statute or supporting guidance requires measures to be permanent structural changes. However, the Secretary of State must be able to rationally demonstrate why a time-limited enhancement satisfies their active duty to further the statutory purpose under the CRow Act in this specific context.	
CNLB-005	Ecology and Biodiversity Landscape and Visual	ExQ2 LV2.1: Time Limited Enhancements	Separately, in assessing the planning balance, we recommend that the Secretary of State should weigh the temporary nature of any enhancements against any temporary or permanent impacts of a proposal on the CNL and its setting.	The Applicant notes this comment and directs its response to CNLB-002 above.
CNLB-006	Ecology and Biodiversity Landscape and Visual	ExQ2 LV2.1: Time Limited Enhancements	3) The Board considers that if there is certainty that the enhancements will be removed at decommissioning, this then would constitute a harm to the setting of the CNL, which should be weighed in the planning balance.	The Applicant respectfully disagrees with the CNLB on this matter and reaffirms its position that rather than the removal of the enhancements being harmful to the setting of the CNL, the removal of the enhancements would

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				constitute a return to the current baseline position.
CNLB-007	Landscape and Visual	ExQ2 LV2.4: Matters Raised at Issue Specific Hearing 2	<i>ExQ2 LV2.4: Matters Raised at Issue Specific Hearing 2</i> <i>The ExA understands that as a result of action point 8 from ISH2 [EV8-010], a meeting was held between the applicant and CNLB on 13 July 2026. The CNLB are asked to confirm if there is agreement with the applicant in relation to:</i> 1) The extent of the setting of the CNL as set out in the applicant's response to ExQ1 LV1.9 [REP3-128] (Annex E). 2) The proposed layout of panels in field A1 as shown in the Works Plans [REP3-004]. 3) <i>Whether there is sufficient information in the control documents to mitigate impacts to the dark skies special quality of the CNL.</i> CNLB Response:	The avoidance measures the Applicant has undertaken to protect the Special Qualities of the CNL has reduced direct adverse effects of the development on the CNL itself and its setting. The Applicant and the LVIA recognise that there are adverse sequential effects to users of routes which connect with the CNL. However, due to the avoidance measure on the edge of the CNL this has avoided significant adverse effects from where the Applicant considers as the setting of the CNL. The Applicant disagrees with CLNBs statement that the character of the landscape between the Fosse Way and the boundary of the CNL is complementary to that of the character of the landscape within the CNL itself. This is evidenced by the Landscape Character Assessment for North Wiltshire which identifies the Hullavington Lowlands as a separate

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			1) The Board notes the submission by the applicant of a plan showing what is, in their view, the extent of the setting of the CNL (Annex E LV1.9 – Spatial Extent of the Setting of the Cotswold National Landscape (PDF page 603) [REP3-128]). At the meeting with the applicant on 13 July 2026, the applicant's landscape consultants explained that the applicant's recognition of the Setting of the CNL has been derived following on site examination of intervisibility between the Scheme and the CNL and through an assessment of the Special Qualities of the CNL and Landscape Character within the LVIA.	character area to those within the CNL – noting that all of the LD Scheme is located within the Hullavington Lowlands Landscape Character Area. This is further expanded upon in the Applicants assessment of effects on the Limestone Lowlands contained within the Limestone Lowlands Character Assessment [REP5-103]. The Applicants position is that there is a distinct difference in the character of the landscape within the CNL and that within the Scheme, evidenced through the difference in key features such as lack of dry stone walls, condition, field pattern and land use.
CNLB-008	Landscape and Visual	ExQ2 LV2.4: Matters Raised at Issue Specific Hearing 2	The Annex E plan shows the setting of the CNL extending to cover an area c.300m from the CNL boundary in fields A1, A11 and A12, in field B12 c.600m from the CNL boundary and areas of fields C1, C6, C8, C9 and C10 within c.400m of the CNL boundary. These are all areas where intervisibility with the CNL is possible.	The Applicant notes this comment and directs its response to CNLB-007 above.
CNLB-009	Landscape and Visual	ExQ2 LV2.4: Matters	The Board does not agree with the applicant's assessment and	The Applicant notes this comment and directs its response to CNLB-007 above.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		Raised at Issue Specific Hearing 2	considers the setting of the CNL to be more extensive than that showed in the Annex E plan.	
CNLB-010	Landscape and Visual	ExQ2 LV2.4: Matters Raised at Issue Specific Hearing 2	Whilst intervisibility is one aspect of setting, the Board concurs with the view expressed by the Inspector in a recent appeal decision concerning a solar farm in Suffolk, within the setting of the Suffolk Coast & Heaths National Landscape ('SC&H NL', appeal ref. APP/D3505/W/25/3370515, decision date 15 July 2026). At paragraph 105 of her decision she states: <i>"The parties agree there is no intervisibility between the appeal site and the SC&H NL. However, setting is about more than direct intervisibility. Being in close proximity to the SC&H NL boundary, I am mindful that functional connectivity to a NL can be important. In this case that approach is significant, with access routes through the landscape including footpaths, bridleways ... All of the landscape witnesses acknowledged that harm to sequential views through this landscape could adversely affect its</i>	The Applicant notes this comment and directs its response to CNLB-007 above.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<i>setting through harm to the approach to the SC&H NL</i> (emphasis added).	
CNLB-011	Landscape and Visual	ExQ2 LV2.4: Matters Raised at Issue Specific Hearing 2	LUC defines the landscape setting of a place as <i>"the surroundings that add to the significance and experience of a defined place"</i> and is clear that setting is more than just views; it includes the experience of the landscape (https://landuse.co.uk/thoughts/landscape-setting-in-practice/).	The Applicant notes this comment and directs its response to CNLB-007 above.
CNLB-012	Landscape and Visual	ExQ2 LV2.4: Matters Raised at Issue Specific Hearing 2	This point is relevant in respect of the Lime Down proposal and particularly given the presence of the Fosse Way and other PRow in the locality which pass in and out of the CNL whilst running through or along the boundary of the site. The Fosse Way runs through the CNL for between 30 and 35 miles of its total length and is highlighted within Section 11 of the Cotswolds AONB Landscape Character Assessment as a notable historic feature. Natural England's guidance for assessing landscapes for designation as National Landscapes highlights cultural heritage (including the historic environment) as one of several	The Applicant notes this comment and directs its response to CNLB-007 above.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			factors that contribute to the natural beauty of a National Landscapes.	
CNLB-013	Landscape and Visual	ExQ2 LV2.4: Matters Raised at Issue Specific Hearing 2	Having now ascertained that the applicant does not consider the entire area of Lime Down sites A, B and C to fall within the CNL, the Board notes and agrees with Wiltshire Council's position expressed in its response to ExQ1 LV1.9 [REP3-142) that the setting of the CNL extends beyond its designated boundary in this area, particularly in relation to the Fosse Way corridor and the land to its north-west.	The Applicant notes this comment and directs its response to CNLB-007 above.
CNLB-014	Landscape and Visual	ExQ2 LV2.4: Matters Raised at Issue Specific Hearing 2	The National Landscape boundary follows the northern edge of the DCO Order Limits at Foxley, passes south of Sherston, and continues along the western edge of the boundary at Alderton.	The Applicant notes this comment and directs its response to CNLB-007 above.
CNLB-015	Landscape and Visual	ExQ2 LV2.4: Matters Raised at Issue Specific Hearing 2	The Fosse Way runs north-east to south-west through the National Landscape, with a gap of around 5 km where it leaves the designation near Foxley (at the northern end) before re-entering it between Alderton and Grittleton. As well as being a heritage asset, this corridor is well used for recreation and functions as a	The Applicant notes this comment and directs its response to CNLB-007 above.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			recognised route through the wider National Landscape.	
CNLB-016	Landscape and Visual	ExQ2 LV2.4: Matters Raised at Issue Specific Hearing 2	The Board agrees with Wiltshire Council's assessment that the land adjacent to and north-west of the Fosse Way shares much of the rural character and some of special qualities and wider landscape associations of the National Landscape and is complimentary to it. Due to the route providing an important recreational connection both within the designated area and into the surrounding countryside, we agree with the Council that the Fosse Way and the land to its north-west form part of the setting of the Cotswolds National Landscape.	The Applicant notes this comment and directs its response to CNLB-007 above.
CNLB-017	Landscape and Visual	ExQ2 LV2.4: Matters Raised at Issue Specific Hearing 2	2) The Board had understood that the Scheme included the avoidance of panels in southern part of field A1, however the applicant stated at the Examination Hearing ISH2 that this was a typographical error in the draft Statement of Common Ground with the Board. The latest iteration of the Works Plans [REP3-004] show that the southern part of field A1 is proposed to feature solar panels.	The Applicant confirms it has removed all panels from the southern area of field A1 has been actioned for D6 and this has been reflected in the relevant updated plans and documents provided at Deadline 6. Following a meeting with a representative from the CNLB on the 12th August 2026 and as reflected in the CNLB's submission provided at

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Deadline 5, the Applicant agreed to remove panels from the southern section of Field A1. The removal of panels from A1 results in the removal of potential Significant Effects to receptors on the edge of the National Landscape aligning with the position taken to remove panels from Field C9 (also at the request of the CNLB). It has been agreed between the Applicant and the representative from the CNLB that the proposed woodland belt dividing the field would no longer be included allowing for the whole of Field A1 to be bought forward as wildflower meadow to provide additional positive enhancement within the setting of the CNL. A historic hedgerow is proposed to be reinstated along the northern boundary of Field A2 to provide mitigation of views of panels within Field A2. The panels in Field A2 have also been shifted south to facilitate the required buffer zones from the new hedgerow and this is reflected.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
CNLB-018	Landscape and Visual	ExQ2 LV2.4: Matters Raised at Issue Specific Hearing 2	Having reviewed the Works Plans and photomontages provided by the applicant, the Board does not support the location of panels within the southern part of Field A1 and recommends that they should be removed from the scheme.	See response to CNLB-017 above
CNLB-019	Landscape and Visual	ExQ2 LV2.4: Matters Raised at Issue Specific Hearing 2	At its closest point, the area proposed to feature panels would be around 300m from the boundary of the CNL. The key viewpoint in this regard is Viewpoint 6 at the junction of the bridleway which runs along the eastern edge of Field A1, the unnamed road that marks the boundary with the CNL and Bustlers Hill. The northern part of Field A1 is proposed as wildflower meadow, however this would not aid in screening the development from this viewpoint and therefore the only screening between the receptor and the panels would be a narrow belt of new planting across the middle of Field A1 which in itself would comprise an artificially created boundary as there is no current boundary planting or features between the northern and southern parts of the field.	See response to CNLB-017 above

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
CNLB-020	Landscape and Visual	ExQ2 LV2.4: Matters Raised at Issue Specific Hearing 2	The REV 3 photomontages provided by the applicant at Deadline 2 [Figure 8-14-6, REP2-010] show that the panels in the southern part of Field A1 would be highly visible in Year 1 from the boundary with the CNL (Viewpoint 6) and also likely for a significant length of the bridleway running south from the CNL boundary along the field edge. The panels would remain visible at Year 15 through the screening in wintertime and would possibly also be visible in summer at Year 15 for receptors travelling along the bridleway past the site on journeys to or from the CNL.	See response to CNLB-017 above
CNLB-021	Landscape and Visual	ExQ2 LV2.4: Matters Raised at Issue Specific Hearing 2	Compared to the baseline situation of an arable field devoid of development, locating panels in the southern part of Field A1 would in our view give rise to major adverse residual visual effects at Year 1 and moderate adverse residual visual effects at Year 15 (i.e. significant at both Year 1 and Year 15). Accordingly, the Board recommends that panels should be removed from the southern part of Field A1 to conserve and enhance the landscape	See response to CNLB-017 confirming the removal of panel infrastructure from the southern area of field A1

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			and scenic beauty of the CNL and its setting.	
CNLB-022	Landscape and Visual	ExQ2 LV2.4: Matters Raised at Issue Specific Hearing 2	3) The Board considers that there is sufficient information in the control documents to provide assurance that impacts upon the dark skies of the CNL will be mitigated.	The Applicant notes CNLBs comments and welcomes their acknowledgement that there is sufficient information in the control documents to provide assurance that significant impacts upon the dark skies of the CNL will be mitigated. The Applicant will engage with the CNLB as a Statutory Consultee for aspects of the Detailed CEMP and OEMP within Lime Down A - C.
CNLB-023	Landscape and Visual	ExQ2 LV2.4: Matters Raised at Issue Specific Hearing 2	At the meeting between the applicant and the Board on 13 July 2026, the applicant explained that there is no lighting associated with the solar infrastructure and referred to their full response to LV1.16 in The Applicant's Response to the Examining Authority's First Written Questions [REP 3-128] and the Outline Operational Environmental Management Plan, the latest version of which is Rev 5 (Clean) [REP4-051].	See response to CNLB-022 above.
CNLB-024	Landscape and Visual	ExQ2 LV2.4: Matters Raised at Issue Specific Hearing 2	The Board understands that Section 3.4 of the Outline OEMP [REP4-051] and paragraph 8.7.62 of ES Volume 1 Chapter 8 Landscape and Visual [APP-060] confirms that permanent	See response to CNLB-022 above.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			lighting is not required within the Solar PV Arrays for the operational phase of the Scheme. Motion sensing security lighting will be provided within substations and within the BESS Area, to be used only for maintenance and security purposes. A sensitive lighting strategy as part of the detailed OEMP will specify how this artificial lighting will be installed and used. The closest substation to the CNL is within Site C and is around 600m from the CNL boundary and if controlled through a detailed OEMP, security lighting of this nature is unlikely to have a significant adverse effect on the CNL's dark skies. The Board would wish to be consulted on the detailed OEMP.	
CNLB-025	Landscape and Visual	ExQ2 LV2.4: Matters Raised at Issue Specific Hearing 2	Nighttime lighting will be required for some maintenance activities for the Solar PV Sites. As stated within paragraph 2.7.2 of the Outline OEMP [REP4-051], all routine maintenance activities, except panel cleaning, would be scheduled for daylight hours as far as practicable. Therefore, it is anticipated that focussed task specific lighting would only be required in the event of emergency works/	See response to CNLB-022 above.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			equipment failure requiring night-time working or panel cleaning operations. Paragraph 2.7.1 of the Outline OEMP [REP4-051] notes that this level of lighting is similar to lighting required for night-time agricultural activities carried out in the area. Again, if controlled through a detailed OEMP, temporary lighting of this nature is unlikely to have a significant adverse effect on the CNL's dark skies.	
CNLB-026	Landscape and Visual	ExQ2 LV2.4: Matters Raised at Issue Specific Hearing 2	Table 2 of the Outline CEMP [REP4-049] states that temporary site lighting during construction will be required to enable safe working during construction and decommissioning during hours of darkness and will be designed as far as reasonably practicable to minimise potential for light spillage outside the Sites and Cable Route Corridor, particularly towards houses, traffic and ecological habitats. It is understood that night-time working will not be employed apart from specific activities including the delivery of abnormal loads and HDD. Requirement 13 of the DCO requires that No part of the authorised development may commence until a	See response to CNLB-022 above.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			construction environmental management plan for that part has been submitted to and approved by the relevant planning authority in consultation with the Environment Agency. The construction environmental management plan must be substantially in accordance with the outline construction environmental management plan. Again, the Board would wish to be consulted on the detailed CEMP.	

3.3 Historic England

Table 3-5 Historic England: Response to the ExA's Second Written Questions

3.3.1 The ExA's Second Written Questions are shown in italics. Historic England's responses are shown in plain text. The Applicant's responses in this document address Natural England's comments.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
HE-001	Cultural Heritage	Archaeology	<i>CH2.5 Preservation by Record – Receptor D24-01 In Appendix C to its WR [REP1-171], Stop Lime Down state that preservation by record, through its nature mitigates harm, it does not eliminate it to the extent assessed by the applicant. As such, Stop Lime Down consider that for receptor D24-01 the residual effect would be moderate adverse (significant), and for other receptors such as C13-01 and C29-01 it would be moderate/ minor. On the other hand, WCAS [REP2-046] consider that excavation of an archaeological site to Chartered Institute for Archaeologists (CIFA) and WCAS standards would substantially reduce the effect of impact upon archaeological sites of local and regional importance such that there would be a negligible adverse effect.</i>	The Applicant notes the comment.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<i>Historic England is asked to comment on the extent to which preservation by record can reduce the direct adverse effect on archaeology at this receptor?</i> In our view, based on policy, harm cannot be reduced by preservation by record. This is because archaeological excavation is destructive and will only achieve a partial record of the remains, as not everything is 100% excavated. This is therefore harm to that heritage asset in NPPF terms or an adverse effect in EIA terms.	
HE-002	Cultural Heritage	Archaeology	Archaeological evaluation will assess the archaeology looking at its preservation, extent, significance and its potential to provide information. A balancing exercise is then needed to look at that significance against the loss proposed by the development.	The Applicant notes the comment.
HE-003	Cultural Heritage	Archaeology	The reports on the evaluation have been shared with us and it is clear that the archaeology recorded so far is of local or regional importance.	The Applicant notes the comment.
HE-004	Cultural Heritage	Archaeology	Under EIA Regulations 2017 Section 14 Part 2 (e) Environmental	The Applicant notes the reference to EIA regulations 2017 Section 14.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			Statements should include a description of any features of the proposed development, or measures envisaged in order to avoid, prevent or reduce and, if possible, offset likely significant adverse effects on the environment. It does not refer to mitigation as this is a means to reduce the effect, which is not possible through the loss of the asset. EN-3 2.10.109 States that 'Applicants should consider what steps can be taken to ensure heritage assets are conserved in a manner appropriate to their significance,..' EN-1 4.1.5 then refers to the mitigation hierarchy – avoid, reduce, mitigate, or compensate for any adverse impacts. In this case using mitigate and compensate rather than offset. The EN1 goes on to set out in 4.2.24 that applicants must apply the mitigation hierarchy and demonstrate that it has been applied. They should	

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			also seek the advice of the appropriate SNCB or other relevant statutory body when undertaking this process. Applicants should demonstrate that all residual impacts are those that cannot be avoided, reduced or mitigated. Then in 4.2.25 it goes on to state that compensation, by definition, does not reduce an adverse effect resulting from a development. However, applicants should set out how residual impacts will be compensated for as far as possible. Applicants should also set out how any mitigation or compensation measures will be monitored and reporting agreed to ensure success and that action is taken.	
HE-005	Cultural Heritage	Archaeology	In this case the archaeological excavation can be seen as the compensation. The recording of the archaeology will increase knowledge about the site and in this instance the wider landscape and how human intervention has affected that landscape over the last 10,000 years.	The Applicant notes this comment.
HE-006	Cultural Heritage	Archaeology	The applicant has shown that they applied the mitigation hierarchy	The Applicant agrees that it has applied the mitigation hierarchy across the site

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			across the whole site by identifying areas for preserving the archaeology in grassland where there will be no panels. Where this cannot be achieved, they are seeking to reduce the harm by looking at alternative foundation designs and micro-siting panels to avoid some of the archaeology. Where they cannot do this excavation areas have been identified.	whereby various archaeological mitigation options have been suggested with consideration to the nature of impact as a result of the Scheme and sensitivity of the archaeological asset.
HE-007	Cultural Heritage	Archaeology	The final location and extent of these are still to be agreed and finalised through the oAMS (Overarching Archaeological Mitigation Strategy).	The Applicant is continuing to discuss the contents of the Outline Archaeological Mitigation Strategy (AMS) with Historic England. See ES Volume 3, Appendix 12-6 Outline AMS [EN010168/APP/6.3] for the latest version of the document.
HE-008	Cultural Heritage	Archaeology	<i>CH2.6 Evaluation Trial Trenching Reports and the Outline Archaeological Mitigation Strategy (oAMS) The ExA note from the statement of common ground (SoCG) between the applicant and both Wiltshire Council [REP4-061] and Historic England [REP4-065] that full evaluation trial trenching reports have been shared with these parties. The Applicant: 1) The applicant is asked to submit the full evaluation trial</i>	The Applicant notes Historic England's summary of communications.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<i>trenching reports into the examination. The Applicant, Wiltshire Council and Historic England: 2) The parties are each asked to provide an update of any discussions that have been undertaken in relation to the evaluation trial trenching reports and any resultant changes that would need to be made to the oAMS or Requirement 12 of the dDCO.</i> Historic England had previously reviewed and commented on the oAMS sending comments by e-mail on the 22nd May 2026. We had recommended that the oAMS should be updated following the final evaluation reports being provided. The evaluation reports were shared with us on 4th June 2026. We then send comments on these on the 9th and 14th July 2026.	
HE-009	Cultural Heritage	Archaeology	The updated oAMS was provided to Historic England on the 30th July 2026. We are currently reviewing that document and will return any comments by the end of next week, 13th August.	Historic England provided further comments on the Outline AMS on the 12th August. The Outline AMS has been updated see ES Volume 3, Appendix 12-6 Outline AMS [EN010168/APP/6.3].

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
HE-010	Cultural Heritage	Archaeology	We have provided comments on the evaluation reports and are currently in discussion with the applicant to agree changes and additional works we feel are needed to fully understand the significance of the archaeology that has been recorded.	The Applicant is currently waiting for comments on the Evaluation trenching reports. In their email on the 12th August Historic England advised that they would be provided by mid-September. See Final Evaluation Reports [EN010168/EXAM/9.72] for the updated reports.
HE-011	Cultural Heritage	Archaeology	Any further changes to the dDCO Requirement 12 will then be reviewed. All discussions will be summarised within the next version of the SoCG.	The Applicant considered the wording of the Requirement 12 to be sufficient to mitigate archaeological remains. The Applicant will continue to discuss the wording of the Requirement and provide updates via the SOCG.
HE-012	Cultural Heritage	Built Heritage	<i>CH2.10 Bradfield Manor Farmhouse (Grade I) The ExA notes that the SoCG between the applicant and Historic England [REP4065] records that the approach to safeguarding designated heritage assets is agreed. With regards to Bradfield Manor Farmhouse, the SoCG records that Historic England acknowledge that in winter the screening would not be so effective and that in the longer</i>	The Applicant welcomes Historic England's agreed that the harm to Bradfield Manor would be at the lower end of less than substantial harm.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<i>distance views the harm caused by panels would not be mitigated. The SoCG records that Historic England consider that the panels would cause harm, but that harm would be less than substantial.</i> <i>Historic England: 1) Can Historic England confirm if it agrees with the applicant's assessment in the Heritage Statement [APP-219] that the harm to Bradfield Manor Farmhouse Would be at the lower end of the scale of less than substantial harm?</i> The range of harm to the significance of heritage assets as defined by 'less than substantial' in the NPPF is wide, considering the very high bar that defines 'substantial harm'. The NPPF does not define a range of harm within the broader definition of 'less than substantial harm', although we agree that the harm caused by the proposed development is likely to be at the lower end. However, paragraph 212 of the NPPF requires the great weight to be given to conservation of heritage assets (and the more	

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			important the asset, the greater the weight should be), irrespective of the degree of harm.	
HE-013	Cultural Heritage	Built Heritage	<i>CH1.12 Adaptive Management of Mitigation With regards to the approach to mitigation for built heritage, the SoCG between the applicant and Wiltshire council [REP4-061] records that Wiltshire Council consider that the deadline 3 updates to the oCEMP [REP3 092] in line with the outline Landscape and Ecological Management Plan (oLEMP) [REP3-100] do not include any proposals for monitoring or assessing the efficacy of the landscaping in providing the mitigation envisaged or for making amendments if required in the future.</i> <i>The Applicant: 1) The applicant is asked to review and respond with proposed measures for the adaptive management of mitigation. Wiltshire Council and Historic England: 2) Wiltshire Council and Historic England are asked to propose any changes that should be made to the management plans to secure adequate monitoring, assessment of</i>	The Applicant notes that Historic England will defer to WC on this matter. The Applicant is continuing to discuss adaptive management of landscape mitigation with WC.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<i>efficacy and adaptations to the mitigation measures as they deem necessary.</i> The monitoring section of the CEMP only allows reviews of the mitigation measures to be undertaken by the Environmental Manager on completion of the works (6.1.4). Therefore, Historic England agrees with Wiltshire Council that future monitoring of the landscaping measures are required to ensure their long-term effectiveness in minimising the harm of the development on the setting of Bradfield Manor. We defer to the recommendations of Wiltshire Council for the timetable for the long-term monitoring of the landscape measures.	
HE-014			<i>CH1.13 Noise Impacts In response to Stop Lime Down's WR [REP1-167], it is noted that the applicant states [REP2-039] that the noise impact on built heritage assets has been assessed to not constitute a significant effect on health and quality of life. The applicant is asked whether the significance of effect on health or quality of life is an appropriate</i>	The Applicant notes Historic England's response.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<i>threshold for determining whether noise from the proposed development would have an adverse impact on the setting of heritage assets or whether noise can have a significant effect on the setting and understanding of a heritage asset without crossing the threshold of significance for health or quality of life? In response, please provide references to any relevant guidance.</i> <i>Wiltshire Council, Historic England and Stop Lime Down may also wish to comment on this matter.</i> Historic England does not wish to comment on the noise impacts on built heritage assets and effects on quality of life.	

3.4 Natural England

Table 3-6 Natural England: Response to the ExA's Second Written Questions

3.4.1 The ExA's Second Written Questions are shown in *italics*. Natural England's responses are shown in plain text. The Applicant's responses in this document address Natural England's comments.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
NE-001	Ecology and Biodiversity	EB2.1 – Livestock and 400kV Cable Depth	<i>The ExA asks that Natural England provide advice on the minimum depth a 400kV cable should be buried across farmland, whether used for livestock grazing or arable activities, to avoid adverse effects on agricultural practice.</i> This question does not fall within Natural England's remit.	The Applicant notes Natural England's comment. The Applicant refers to the response provide to Question EB2.1 in the Applicant's Response to the Examining Authority's Second Written Questions [REP5-097]
NE-002	Ecology and Biodiversity	EB2.4 – Great Crested Newts (GCN)	<i>The ExA is in receipt of the District Level Licence Impact Assessment and Conservation Payment Certificate for the CRC [REP2-041]. However, the ExA are not clear on Natural England's position with respect to GCN in the solar PV sites despite the wording of the SoCG [REP4-063] 3.3.16 and that it is now 'Agreed'. The wording of this is unclear and both the applicant and Natural England are requested to</i>	The Applicant notes Natural England's comment and refers to the relevant response provided to Question EB2.4 in the Applicant's Response to the Examining Authority's Second Written Questions [REP5-097] submitted at Deadline 5, whereby Natural England's agreement on 3.3.16 of the Statement of Common Ground particularly in relation to the Applicant's approach to great crested newts (GCN) is discussed.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<i>provide a clear explanation of the current position.</i> As noted, the Impact Assessment and Conservation Payment Certificate (IACPC) relates to the Cable Route Corridor (CRC) and does not include the Solar PV Sites. Up to now, the District Level Licencing (DLL) team have only been involved in the enquiry assessment process and the issuing of the IACPC. It is noted that section 3.3.13 of the Statement of Common Ground records Natural England's concerns regarding potential impacts on GCN at the Solar PV Sites. Although this is showing as 'under discussion', the Applicant's position states that the only issue within Natural England's remit yet to be agreed is in relation to impacts on badgers. This may explain why section 3.3.17 is 'Agreed' as the Applicant has provided information detailing the proposed mitigation approach and it isn't in Natural England's remit to state whether a licence is needed. Natural England's DLL team can confirm that it is	

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			satisfied with the DLL approach for the CRC. Further relevant information is provided below.	
NE-003	Ecology and Biodiversity	EB2.4 – Great Crested Newts (GCN)	<i>Please provide a response to the concerns raised by Wiltshire Council regarding GCN in their deadline 4 submission [REP4-091], reference EB1.7.</i> In response to Wiltshire Council's comments, the DLL team are aware that the IACPC only relates to the CRC. As stated above, it is understood that Natural England has previously sought further information on mitigation for impacts to GCN at the Solar PV Sites. In our view, further concerns raised by Wiltshire Council require the Applicant to clarify their mitigation strategy and whether they intend to apply for a licence for other areas of the site. Natural England's DLL team are unable to advise whether a licence is required for the Solar PV Sites, as this is a matter for the Applicant to determine. The DLL team can only advise on the extent of land included within a DLL enquiry. If other areas of habitat could	The Applicant notes Natural England's comment. For clarity, the Applicant does not intend to submit a DLL enquiry for land at the Solar PV Sites, and the mitigation strategy relating to great crested newts (GCN) presented in Method Statement 12 of the Outline EPMS [REP5-081] presents a precautionary non-licensed approach to works at the Solar PV Sites which is considered suitably proportionate and robust by the Applicant. The Applicant also refers to its response to Natural England representation NE-071 (pages 539 to 540) in the Applicant's Response to Relevant Representations (Part 1) [PDA-009], submitted at Procedural Deadline A. That response signposted the sections of the Outline EPMS [REP5-081] that provide further detail on the measures proposed to avoid impacts on GCN within the Solar PV Sites. Further detail on this matter is provided in the Applicant's response to Question

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			be impacted, it is the Applicant's decision whether to rely on a DLL approach, an alternative licensing route or non-licensed approaches where these are lawful and appropriate. As set out above, Natural England has raised concerns regarding potential impacts to protected species, including great crested newts, at the Solar PV Sites and this matter remains under discussion. If the Applicant wishes to extend the DLL IACPC coverage to the Solar PV Sites or submit a new enquiry, discussions should be held with the DLL team.	EB2.4 in the Applicant's Response to the Examining Authority's Second Written Questions [REP5-097] submitted at Deadline 5. The Applicant has subsequently sought confirmation from Natural England regarding its position on protected species matters, including GCN, through requests for further correspondence. At the time of submitting this response, no response has been received from Natural England to these requests.
NE-004	Ecology and Biodiversity	EB2.8 – Barn Owls / Nesting Birds / Overwintering Birds	<i>Please provide comment on the applicant's approach to avian species including barn owls, nesting birds and overwintering birds with respect to survey methodology and results, or lack thereof. Specifically, the ExA request that you consider the applicant's approach in the CRC of assuming the presence of species, as opposed to undertaking species surveys. You are also asked to consider the merits of the applicant's approach in the control documents</i>	The Applicant notes Natural England's comment.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<i>relating to avian species. In providing your response you are invited to review the contents of the applicant's Statement of Common Ground (SoCG) with Wiltshire Council [REP4-063] sections 3.5.18 and 3.5.19.</i> Natural England has reviewed the Applicant's approach to barn owls, nesting birds and overwintering birds, including the use of precautionary assumptions within parts of the Cable Route Corridor.	
NE-005	Ecology and Biodiversity	EB2.8 – Barn Owls / Nesting Birds / Overwintering Birds	A precautionary assumption of species presence can be a legitimate assessment approach where sufficient information is available to identify suitable habitat and likely ecological constraints, and where this is supported by appropriately targeted avoidance and mitigation measures. However, for birds, the acceptability of such an approach is particularly dependent upon the quality of the underlying evidence base.	The Applicant notes Natural England's comment. The Applicant agrees that the appropriateness of a precautionary assumption of species presence is dependent upon the availability and quality of the underlying evidence base, However, it is also necessary to consider the proportionality of such an approach, having regard to the potential for impacts on the species concerned and the scale, nature and duration of the proposed works.
NE-006	Ecology and Biodiversity	EB2.8 – Barn Owls / Nesting Birds /	Therefore, assuming the presence of widespread species within the CRC and providing generic mitigation designed to avoid impacts (eg	The Applicant notes Natural England's comment. Assumptions relating to the assemblage of breeding and wintering birds have

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		Overwintering Birds	through timing of works) or mitigate (eg through provision of habitat enhancement measures such as the provision of skylark nesting plots during the nesting season) might be acceptable. However, an approach that assumes rarer species are not present based solely on their perceived rarity in the locality and without sufficient survey effort would not be considered precautionary.	been informed by existing bird survey data for the Solar PV Sites, which are similar in character to the Cable Route Corridor, together with relevant desk study information and baseline habitat information collected through surveys across the Scheme. Where suitable habitat is present within the Cable Route Corridor (as identified through baseline habitat surveys), bird species have been assumed to be present on a precautionary basis. No species have been excluded from consideration on the basis of rarity where suitable habitat exists. Furthermore, habitats within the Cable Route Corridor have been assessed on their suitability to support breeding and wintering birds, with a particular consideration for their potential to support Schedule 1 bird species. It is the Applicant's view that this approach, together with the avoidance and mitigation measures set out within the Outline EPMS [REP5-081], is appropriately precautionary, particularly given the temporary nature of the proposed works within the Cable Route

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Corridor. Such measures include sensitive timing of works as far as reasonably practicable, pre-commencement checks, temporary habitat degradation / dissuasion to reduce the suitability of impacted habitat in the short-term, and installation of suitable buffer zones should active nests be identified.
NE-007	Ecology and Biodiversity	EB2.8 – Barn Owls / Nesting Birds / Overwintering Birds	Unlike other protected species, there is generally no licensing route available to authorise impacts to wild birds arising from development activities. As a result, the primary means of ensuring legal compliance and ecological impact avoidance is through the identification of potential risks in advance and the implementation of appropriate non-licensed avoidance and mitigation measures.	The Applicant notes Natural England's comment. The ecological avoidance and mitigation measures relating to breeding and wintering birds are set out within the Outline EPMS [REP5-081] . The preparation, approval and implementation of the detailed EPMS, substantially in accordance with the Outline EPMS [REP5-081] , are secured through Requirement 8 in Schedule 2 of the Draft DCO [REP5-012] .
NE-008	Ecology and Biodiversity	EB2.8 – Barn Owls / Nesting Birds / Overwintering Birds	Natural England would therefore stress that the assessment of impacts to birds should be supported by survey effort proportionate to the habitats present, the potential for rare species and the nature of the predicted impacts. Survey information plays a key role in informing the	The Applicant notes Natural England's comment and maintains that the assessment of impacts to birds presented in ES Volume 1, Chapter 9: Ecology and Biodiversity [REP4-010] is based on a suitably precautionary and proportionate survey and assessment methodology, and that the associated

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			design of mitigation, identifying sensitive locations and periods, and ensuring that avoidance measures are appropriately targeted.	avoidance and mitigation measures set out within the Outline EPMS [REP5-081] are sufficiently robust. The Applicant notes that Natural England has not raised any concerns regarding breeding and wintering birds to date, including through successive iterations of the Statement of Common Ground (SoCG). Furthermore, the ecological protection measures set out in the Outline EPMS [REP5-081] are recorded as 'Agreed' within the SoCG. The Applicant recognises that Natural England's comments are typically focused on matters within its regulatory remit, including protected species subject to licensing and features associated with designated nature conservation sites. In the absence of concerns raised by Natural England in relation to breeding and wintering birds and having regard to the agreed position recorded in the SoCG, the Applicant considers that the proposed ecological protection measures are appropriate to protect habitats and species during construction, including breeding and wintering birds.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Accordingly, the Applicant considers that no further survey work or additional mitigation in respect of breeding or wintering birds is necessary or proportionate.
NE-009	Ecology and Biodiversity	EB2.8 – Barn Owls / Nesting Birds / Overwintering Birds	For barn owls, nesting birds and overwintering birds, the principal consideration should be whether sufficient information has been collected to inform the mitigation strategy and whether the proposed control documents provide a robust framework for avoiding adverse effects during construction and operation.	The Applicant notes this comment and refers to the Statement of Common Ground with Natural England [REP4-064] in which the survey methodology and proposed avoidance and mitigation measures for breeding and wintering birds have been marked as 'Agreed'. The Applicant recognises that Natural England's comments are typically focused on matters within its regulatory remit, including protected species subject to licensing and features associated with designated nature conservation sites. In the absence of concerns raised by Natural England in relation to breeding and wintering birds and having regard to the agreed position recorded in the SoCG, the Applicant considers that the proposed ecological protection measures are appropriate to protect habitats and species during construction, including breeding and wintering birds.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
NE-010	Ecology and Biodiversity	EB2.8 – Barn Owls / Nesting Birds / Overwintering Birds	Generally, Natural England would caution against over-reliance on the assumption of species presence as a substitute for survey effort where survey information is necessary to understand likely impacts. Rather, assumption can be an appropriate precautionary tool where the level of ecological uncertainty is low and where avoidance and mitigation measures can be designed on a sufficiently precautionary basis.	The Applicant agrees that assumptions of species presence should not generally be relied upon as a substitute for survey effort where survey information is necessary to understand likely impacts. However, the Applicant considers that, in the circumstances of the Cable Route Corridor, the use of precautionary assumptions is appropriate and proportionate, having regard to the temporary and short term nature of works, the extent of the available survey information, and the measures proposed to avoid and minimise impacts on avian species. The assessment presented in ES Volume 1, Chapter 9: Ecology and Biodiversity [REP4-010] has been informed by the existing bird survey data for the Solar PV Sites, which are similar in character to the Cable Route Corridor, together with relevant desk study information and baseline habitat information collected through surveys across the Scheme. Where the presence of a species or its use of a habitat could not be conclusively established, the Applicant has adopted

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				a precautionary approach where appropriate rather than assuming absence. Such assumptions have been considered within the assessment of potential effects and, where relevant, have informed the proposed avoidance and mitigation measures. The Applicant considers that the circumstances described by Natural England are met in this case, in that the level of ecological uncertainty is sufficiently understood and the proposed avoidance and mitigation measures can be implemented on a precautionary basis. In particular, the measures secured through the Outline EPMS [REP5-081] provide an appropriate framework for managing potential effects on avian species during construction, including where the presence of species has been assumed. Such measures include sensitive timing of works as far as reasonably practicable, pre-commencement checks, temporary habitat degradation / dissuasion to reduce the suitability of impacted habitat in the short-term, and

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				installation of suitable buffer zones should active nests be identified. The Applicant therefore considers that the approach adopted does not represent an over-reliance on assumptions in place of necessary survey effort. Rather, precautionary assumptions have been used where appropriate to ensure that potential effects are not underestimated and to inform suitably precautionary mitigation. On this basis, the Applicant considers that the assessment is proportionate to the potential impacts of all elements of the Scheme, particularly considering the temporary and short-term nature of works within the Cable Route Corridor, and that no further survey effort is necessary to inform the assessment or the mitigation measures proposed.
NE-011	Ecology and Biodiversity	EB2.8 – Barn Owls / Nesting Birds / Overwintering Birds	The acceptability of the Applicant's approach will depend on their demonstrating that the available survey information is sufficient to inform the proposed mitigation and that the avoidance and mitigation measures secured through the control documents are capable of preventing adverse effects on bird	The Applicant notes Natural England's comment and refers to the detailed relevant responses to NE-004 to NE-010 above. Overall, having regard to the assessment presented in ES Volume 1, Chapter 9: Ecology and Biodiversity [REP4-010], the Applicant considers that the proposed survey, assessment, avoidance and mitigation measures are

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			populations. The proposals are not, however, something that Natural England's Wildlife Licensing Service can offer detailed commentary on, given the lack of a licensable route for addressing such impacts.	sufficient to address potential impacts to breeding and wintering birds. In particular, the measures secured through the Outline EPMS [REP5-081] provide an appropriate framework for protecting habitats and species during construction, including through measures designed to avoid or minimise potential impacts to avian species.
NE-012	Ecology and Biodiversity	EB2.14 – Mitigation Hierarchy	<i>Should the applicant agree to the above avoidance measure to protect ground nesting birds and other assumed presence of protected species do you consider that this would avoid any Likely Significant Effects (LSE) and meet with the terms of the mitigation hierarchy? If not, please provide details.</i> Natural England agree that the proposed avoidance measure for protected species whereby presence is assumed would meet the terms of the mitigation hierarchy. Natural England also support the approach to out of season works for assumed presence protected species.	The Applicant welcomes Natural England's comment and refers to the Applicant's response to Question EB2.14 in the Applicant's Response to the Examining Authority's Second Written Questions [REP5-097] submitted at Deadline 5. The Applicant maintains that the ecological assessment and mitigation strategy has been developed in accordance with the mitigation hierarchy.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
NE-013	Ecology and Biodiversity	EB2.14 – Mitigation Hierarchy	As mentioned in the ExA question, with regards to dormice Natural England agree with the two-stage approach to hedgerow clearance during seasonal timings to avoid impacts on breeding dormice. Dormice surveys can be unreliable as they are very mobile species and their nests are temporary, therefore it is difficult to rely on surveys to avoid impacts during hedgerow removal. An agreed method statement for the removal of dormice habitat is more effective at avoiding impacts.	The Applicant welcomes Natural England's comment and refers to Method Statement 13 of the Outline EPMS [REP5-081] which details the measures required to be implemented to avoid impacts on dormice during removal of sections of hedgerow. The Applicant also refers to the Statement of Common Ground with Natural England, within which the approach to consideration of dormice during hedgerow removal has been marked as 'Agreed'.
NE-014	Ecology and Biodiversity	EB2.14 – Mitigation Hierarchy	For protected species with permanent structures, such as badger setts and bat roosts, these should be checked and known setts or roosts avoided from the cable route. It is noted in the Outline Ecological Protection and Mitigation Strategy that some unavoidable tree losses may occur along the cable route corridor. Natural England advise that trees with known bat roosts are avoided from the cable route and their impacts minimised to ensure functionality of roosts is maintained. We note that any trees to be impacted by the works will be	The Applicant notes Natural England's comment. sets out requirements of pre-commencement checks for badger setts and bat roosts in Method Statements 5 and 8. Trees within the Cable Route Corridor have been assessed for their potential to support roosting bats, with details of these surveys provided in ES Volume 3, Appendix 9-3: Bat Survey Report [APP-200] . A total of 29 trees were identified as having high bat roosting potential; loss of these trees will be avoided as far as is reasonably practicable during detailed design and micro-siting of the cable route. However,

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			inspected for bat roosting by a qualified ecologist in advance. This approach is welcome however in order to meet the mitigation hierarchy, trees along the cable route corridor should be surveyed for their roosting potential and any trees with high roosting potential should not be impacted by the works.	should loss of these trees be unavoidable, further surveys will be undertaken in line with best practice survey guidelines to update the assessment of roosting potential for each tree potentially impacts, confirm the presence or likely absence of roosts, determine whether and additional avoidance or mitigation is required, and inform the requirement for necessary licences sought from Natural England, if required as a last resort. The Applicant considers that this approach accords with the mitigation hierarchy, with avoidance of impacts through detailed design and micro-siting prioritised wherever reasonably practicable, followed by further survey and appropriate mitigation where impacts cannot be avoided. The measures set out in the Outline EPMS [REP5-081] therefore provide an appropriate and precautionary framework for managing potential impacts on bats during construction.
NE-015	Ecology and Biodiversity	HRA2.1 – Bath and Bradford on Avon Bats	<i>Considering Wiltshire Council's ongoing concerns [REP4-061] that targeted bat activity surveys should</i>	The Applicant welcomes Natural England's comment. Hedgerows have been identified within the Cable Route Corridor where removal is likely to be

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		Special Area of Conservation (SAC)	<i>have been undertaken within the CRC, can Natural England confirm:</i> <i>That it is satisfied that the current survey information provides sufficient evidence to assess the effects of the CRC works on Annex II bat species associated with the Bath and Bradford-on-Avon Bats SAC?</i> Natural England can confirm that it is satisfied that the approach to bat surveys within the Cable Route Corridor is reasonable given the temporary nature of impacts on habitats and the reinstatement of habitats post-construction. It is our view that a maximum 10m temporary hedgerow gap would be unlikely to have an adverse effect on the commuting behaviour of bat species, including Annex II species. We note Wiltshire Council's comments regarding hedgerow removal in their SoCG with the applicant and agree that all hedgerow removal areas should be clearly marked in the relevant submitted documentation.	required, as shown on the Hedgerow Removal Plan included within Annex A of the Outline EPMS [REP5-081]. The exact locations of hedgerow removal within the Cable Route Corridor will be determined at detailed design stage and during cable micro-siting.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
NE-016	Ecology and Biodiversity	HRA2.1 – Bath and Bradford on Avon Bats Special Area of Conservation (SAC)	<i>Whether targeted bat activity surveys within the CRC would be likely to have materially influenced the conclusions of the HRA?</i> Given the agreed avoidance and mitigation measures, Natural England does not consider that targeted bat activity surveys within the CRC would have a material influence on the conclusions of the HRA.	The Applicant welcomes Natural England's comment.
NE-017	Ecology and Biodiversity	LV2.1 – Time Limited Enhancements	<i>The applicant's stated in its response to ExQ1 LSF1.1 [REP3-128] that there are no significant permanent effects on agricultural land, as all land will be returned to its original use and condition as far as practicable following decommissioning. The creation of wildflower meadows within fields A1, C1, C6, C8, C9 and B12 and the creation of wildflower meadow verges in A11, A12 and C10 are relied on by the applicant as beneficial effects to further the purposes of the Cotswolds National Landscape (CNL). The ExA understands that these enhancement measures are therefore time limited and removed at decommissioning.</i>	The Applicant welcomes Natural England's comment.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<i>The parties are asked to comment on whether a time limited enhancement can be relied on to seek to further the purpose of conserving and enhancing the natural beauty of the national landscape under section (s) 85 of the Countryside and Rights of Way Act 2000 (as amended) (CRoW Act)?</i> Natural England advises that the habitat creation measures proposed as part of the scheme are in themselves highly significant. Although the proposed wildflower meadows and verges lie outside the Cotswolds National Landscape (CNL), they would strengthen ecological connectivity between habitats within the CNL and those within its setting. The substantial increase in species-rich grassland in close proximity to the CNL would also enhance the resilience of grassland habitats and their associated species assemblages within the CNL over time as they mature. However, newly created species-rich grasslands such as those proposed can take many	

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			decades to achieve their full ecological potential, potentially exceeding the operational lifetime of the solar farm. This is reflected in the CNL Management Plan, which identifies lowland calcareous grassland as an irreplaceable habitat. Natural England is therefore satisfied that the creation of permanent species rich grassland habitats at scale close to the CNL would make an important contribution to meeting the legal duty to seek to further the purpose of conserving and enhancing the natural beauty of the CNL.	
NE-018	Ecology and Biodiversity	LV2.1 – Time Limited Enhancements	However, if the ExA's understanding is that these wildflower meadows are to be removed on decommissioning, then the ecological benefits arising from their creation would be lost and therefore the contribution they would make to fulfilling the 'seek to further' duty would only be temporary and much reduced in scope. Further, although substantive temporary ecological benefits would still result, ultimately it would fail to further the purpose of conserving and enhancing the natural beauty in so far as at the	The Applicant notes Natural England's comment and refers to its response LV2.1 in The Applicant's Response to the Examining Authority's Second Written Questions [REP5-097] Whilst the species-rich grassland proposed within the Solar PV Sites may not be retained indefinitely under the Development Consent Order which is time limited, following decommissioning, the Applicant does not agree that this means the habitat creation measures fail to further the purpose of conserving and enhancing the natural beauty of the

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			end of the scheme the CNL would be no better off when compared to the pre-development baseline. It is therefore difficult to justify how the creation of species rich grasslands on a temporary basis can be regarded as fully meeting the duty to further the purpose of conserving and enhancing the natural beauty of the CNL.	CNL during the operational lifetime of the Scheme. The creation and management of species-rich grassland would deliver substantial ecological benefits over the duration of the Scheme, including enhanced habitat diversity, increased botanical interest, and improved opportunities for a range of wildlife species. These benefits would be secured and maintained for a significant period and would represent a notable enhancement relative to the existing agricultural baseline. The Applicant further notes that the Scheme has been designed as, and seeks consent for, a temporary development, with decommissioning providing for the restoration of the land at the end of the operational period. The removal of temporary ecological enhancements at that stage would not result in the CNL being in a materially worse condition than the pre-development baseline. Rather, the Scheme would provide a substantial period during which ecological value

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				and within the affected area would be enhanced beyond existing conditions. The Applicant therefore considers that the contribution of the species-rich grassland to conserving and enhancing the natural beauty of the CNL should be assessed having regard to the benefits delivered throughout the operational lifetime of the Scheme. Whilst those benefits are temporary in nature, they are nevertheless substantive and contribute positively to the purpose of conserving and enhancing the natural beauty of the CNL for the duration of the Scheme's operation. The Applicant considers that a time-limited enhancement can be relied upon to seek to further the purpose of conserving and enhancing the natural beauty of the CNL under section 85 of the CROW Act as there is no specific requirement within the wording of the Act or supporting DEFRA guidance for enhancements to be permanent.
NE-019	Ecology and Biodiversity	LV2.1 – Time Limited	Natural England also questions whether it is appropriate for a solar	The Applicant refers its response above to NE-018 and to its response LV2.1 in

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		Enhancements	farm consent to predetermine how habitats created through the scheme should be treated at the end of the operational period.	The Applicant's Response to the Examining Authority's Second Written Questions [REP5-097]. Following decommissioning the land would be returned to the landowner as quickly as is practicable. Landowners have indicated that they are amenable to considering the continuation of any necessary environmental schemes or protective measures in the future, where required, to facilitate the continued use of these fields based on their enhancement measures associated with the Scheme.
NE-020	Ecology and Biodiversity	LV2.1 – Time Limited Enhancements	Permanent species-rich grasslands are a rare and valuable habitat resource. Should the proposed habitat creation measures be successfully implemented, the resulting grasslands may achieve a condition and ecological significance sufficient to qualify as Priority Habitat (Habitat of Principal Importance under Section 41 of the Natural Environment and Rural Communities Act 2006). Further, under the current legislative framework, proposals to convert more than 2 hectares of permanent grassland that has been in	The Applicant notes Natural England's comment and acknowledges the potential future ecological value of proposed species-rich grasslands at the Solar PV Sites in Paragraph 9.11.3 of ES Volume 1, Chapter 9: Ecology and Biodiversity [REP4-010] . An Extended UKHabitat Classification Survey (or equivalent) will be conducted at the Solar PV Sites no more than 12 months prior to decommissioning to identify ecological constraints and opportunities, including potential presence of Priority Habitats, as set out within ES Volume 1 Chapter 9: Ecology and Biodiversity

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			place for over 15 years back to an arable use would require assessment under the Environmental Impact Assessment (Agriculture) (England) (No. 2) Regulations 2006. The loss of such a substantial area of permanent grassland such as that envisaged under the proposals would presently be regarded as a highly significant adverse effect on biodiversity interests.	[REP4-010] and the Outline Decommissioning Strategy [REP5-075] . Where habitats are identified as being of particular value for biodiversity, they may be retained rather than reverted to their original agricultural use. Ecological constraints, including presence of ecologically valuable habitats, will be subject to appropriate avoidance, mitigation and/or compensatory measures in line with prevailing guidance to avoidance or minimise potential significant adverse effects resulting from the decommissioning phase as far as is reasonably practicable.
NE-021	Ecology and Biodiversity	LV2.1 – Time Limited Enhancements	In this context, it would be unsafe to assume, at the point of consent, that the habitats created by the scheme should be reverted to an arable use after the operation phase of the development. Such a decision would be taken without full information on the quality of the habitats involved or their relative importance at the time of decommissioning. The future conversion or management of such habitats should instead be determined in accordance with the	The Applicant notes Natural England's comment and refers to the relevant response provided to NE-020 above.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			policy and legislative framework in place at that time, having regard to their ecological condition and conservation significance of the habitats that have developed over the lifetime of the scheme.	
NE-022	Ecology and Biodiversity	LV2.1 – Time Limited Enhancements	<i>If enhancements are removed at decommissioning, would that then be considered a harm to the purposes of the Cotswolds National Landscape at decommissioning?</i> The answer to the question is entirely dependent on which baseline the removal of the wildflower meadows is compared to. If the current baseline is used for comparison, the removal of the wildflower meadows (and returning the land to a more explicitly agricultural use) would be equivalent to the current baseline. In this context, the removal of the wildflower meadows would not be considered as a harm, although by the same measure the temporary habitats would do little to further the purpose of conserving and enhancing the natural beauty of the CNL.	The Applicant notes Natural England's comment and refers to the relevant response provided to NE-018 above in relation to the benefits provided by proposed habitats in comparison to existing baseline in the context of the temporary nature of the Scheme.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
NE-023	Ecology and Biodiversity	LV2.1 – Time Limited Enhancements	However, when compared to the baseline just prior to decommissioning, the removal of such a large extent of well-established wildflower meadows would be a highly significant loss to biodiversity interests in its own right and such a large scale loss within the setting of the CNL would be considered as harmful to the purposes of conserving and enhancing the natural beauty of the CNL, due to the adverse effect on the ecological connectivity and habitat resilience within and adjacent to the CNL.	The Applicant notes Natural England's comment and refers to the relevant response provided to NE-020 above in relation to the potential ecological impacts of removal of species-rich grasslands on decommissioning of the Scheme. The Applicant reaffirms its position that rather than the removal of the enhancements being harmful to the setting of the CNL, the removal of the enhancements would constitute a return to the current baseline position.
NE-024	Ecology and Biodiversity Landscape and Visual	LV2.2 – Furthering the Purposes of the Cotswolds National Landscape	<i>The ExA notes that the SoCG between the applicant and Natural England [REP4-063] states Natural England's position that the enhancement measures detailed in the applicant's Assessment of Effects on the CNL and its Special Qualities [APP-197] aid in demonstrating that the scheme will further the purposes of the National Landscape.</i> <i>Further to question LV2.1 above regarding the consideration of time</i>	The Applicant welcomes Natural England's comments. The Applicant considers that a time-limited enhancement can be relied upon to seek to further the purpose of conserving and enhancing the natural beauty of the CNL under section 85 of the CROW Act as there is no specific requirement within the wording of the Act or supporting DEFRA guidance for enhancements to be permanent. The Applicant notes that the CNLB and

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<i>limited enhancements, do Natural England consider that the proposed development demonstrates that enough has been done to fulfil the duty to seek to further the purpose of conserving and enhancing the natural beauty of the national landscape under s85 of the CRow Act?</i> Natural England is satisfied that, provided the ecological enhancements delivered by the scheme within the setting of the CNL are retained following decommissioning, the agreed measures would help meet the statutory duty under Section 85 of the CRow Act to further the purposes of conserving and enhancing the natural beauty of the national landscape during the operational phase of the development and beyond.	Wiltshire Council agree with that position.
NE-025	Transport and Access Landscape and Visual	LV2.2 – Furthering the Purposes of the Cotswolds National Landscape	Natural England is however aware that the Cotswolds National Landscape Board (CNLB) has raised concerns about the increase in traffic movements on roads within – and /or along the boundary of – the CNL that would result from the construction	Environmental Management and Assessment's Guidelines on Environmental Assessment of Traffic and Movement explains at para 4.38 that in order to undertake an assessment, the landscape expert will not need detailed traffic data, but will

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			and decommissioning phases of the development. Natural England agrees with the CNLB that increases in traffic movements, particularly HGVs, is likely to have an adverse effect on the relative tranquillity of the CNL, which is one of the area's special qualities, albeit for a temporary period. This issue would be particularly significant if (i) traffic movements and / or (ii) HGV movements were to increase by 10% or more. This 10% threshold is derived from the Institution of Environmental Management and Assessment's Guidelines on Environmental Assessment of Traffic and Movement and is referred to in the CNLB Tranquillity Position Statement.	require a clear description, readily understood by a non-expert reader, of what the changes to the traffic would include (for example, type of vehicles, frequency, duration, and traffic volume). The Applicant confirms that the Tranquillity Assessment - Effects of Construction Traffic on the Cotswolds National Landscape [REP5-099] was submitted into examination at Deadline 5.
NE-026	Transport and Access Landscape and Visual	LV2.2 – Furthering the Purposes of the Cotswolds National Landscape	Natural England advises the applicant should therefore provide a robust justification for routing traffic through the CNL with alternatives used wherever possible. The justification should set out why the proposed route through the CNL is the most appropriate option in light of the likely impacts on the special qualities of the CNL. Consideration should be given	The Applicant has directly addressed this point within Construction Routes in the Cotswold National Landscape Technical Note [REP1-131] and respectfully directs NE to this document. Further to the Technical Note on Tranquillity, the Applicant has submitted Tranquillity Assessment – Effects of

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			to whether the applicant has taken all reasonably practicable steps to (i) avoid and (ii) mitigate these impacts. If temporary impacts on the tranquillity of the CNL cannot be avoided by rerouting or in other ways reducing traffic volume then further consideration should be given to what additional measures might be employed to ensure the scheme meets its duty to further the purposes of the National Landscape with respect to tranquillity during the construction and decommissioning period.	Construction Traffic on the Cotswolds National Landscape [REP5-099] at Deadline 5.
NE-027	Landscape and Visual	LV2.5 – Setting of the Cotswolds National Landscape	<i>Natural England is asked if it agrees with the applicant's response to ExQ1 LV1.9 [REP3-128] (Annex E) where it defined the setting of the Cotswolds National Landscape in spatial terms? If not, Natural England is asked to define in spatial terms the extent of the area outside of the boundary of the National Landscape that it considers forms its setting?</i> Natural England does not agree with the applicant's definition of the setting	The Applicant notes these comments and responds in more detail below.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			of the Cotswolds National Landscape in spatial terms. When considering this question, it is important to clarify that the setting of the Cotswolds National Landscape (CNL) is not one, fixed spatial area. What constitutes the setting will vary from one development to another. However, Natural England acknowledges that there is potentially scope to define the setting of the CNL, in spatial terms, in relation to a particular development. Natural England's response is provided in this context.	
NE-028	Landscape and Visual	LV2.5 – Setting of the Cotswolds National Landscape	The Applicant's Response to the Examining Authority's First Written Questions addresses the issue of the setting of the Cotswolds National Landscape in response to question LV1.9, on pages 389-390 of their response, and in Annex E, on pages 603-606 of their response. Their response to question LV1.9 quotes a couple of sections of the Cotswolds National Landscape Board's (CNLB) Position Statement	The Applicant notes these comments and responds in more detail below.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			on Development in the Setting of the Cotswolds AONB,1 including the Position Statement's definition of 'setting'. It then states: • In consideration of the above and with reference Volume 3, Appendix 8.6: Assessment of Effects on the Cotswolds National Landscape and its Special Qualities Appendix 8-62 [APP-197] the applicant has prepared a plan showing the Spatial Extent of Setting of the CNL which is attached. However, the applicant does not specify the methodology that was used for identifying the spatial extent of the setting of the CNL. As such, it is not possible for Natural England to state that it agrees with the applicant's definition of the setting of the CNL.	
NE-029	Landscape and Visual	Setting relating to visual impacts	Setting relating to visual impacts One of the quotes that the applicant has used from the CNLB's Position Statement focuses on visual impacts. As such, the area which the applicant has identified as being within the	The Applicant has identified the setting of the CNL to be defined by the area within which development and land management proposals, by virtue of their nature, size, scale, siting materials or design can be considered to have an impact, positive or negative, on the

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			setting of the CNL, presumably, relates primarily to those sections of the proposed development (including associated infrastructure) that would be visible from the CNL. Clarification is required as to whether this assumption is correct and, if not, what other factors have been taken into consideration. All parts of the development that would be visible from the CNL should be included in the setting.	landscape, scenic beauty and special qualities of the CNL.
NE-030	Landscape and Visual	Setting relating to visual impacts	Most of the area's that the applicant has identified as being within the setting of the CNL are contiguous with the CNL. However, there is one section (B12), as shown on page 605 of the applicant's response, where this is not the case. In this instance, there is a gap between the CNL and the area that the applicant considers to be within the setting of the CNL. Where there is a gap between the CNL and parts of the development that would be visible from the CNL, the intervening land should also be included in the setting (i.e. the setting should not just be treated as the land within the order limits).	The Applicant has limited its description of the setting of the CNL to land within the Order Limits proposed for solar infrastructure. This is not to say that the setting of the CNL is wholly contained to these areas, however the Applicant has sought to identify those areas of the Lime Down Scheme that it considers to be within the setting of the CNL.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
NE-031	Landscape and Visual	Setting relating to visual impacts	Even where the proposed development is contiguous with the CNL, there may be locations further afield within the CNL from where the development would be visible. Again, any intervening land, outside of the CNL, between these viewpoints and the development (i.e. the order limits) should be included in the setting.	The Applicant notes these comments and responds in more detail below.
NE-032	Landscape and Visual	Setting relating to visual impacts	Consideration should also be given to locations where the proposed development (including associated infrastructure) would impact on views looking towards the CNL from viewpoints outside the CNL. It is not clear whether this has been done in the applicant's mapping of the CNL setting.	The Applicant has considered both views to and from the CNL. An example of the Applicants consideration of this issue is demonstrated by the removal of Fields C2, C3 and C4 from the Application and the avoidance of panels within Field C1 and C6 where the Applicant has sought to maintain views towards St Gile's Church at Alderton from PRoW WT LUCK 35 (TP077) which is located outside of the Order Limits but from which views of the church within the CNL are possible. Another example is from PRoW WT SHER 15 (TP027) within Field A11 where panels have been avoided to maintain views into the CNL and of the Church of the Holy Cross in Sherston. Both examples demonstrate where the Applicant has recognised the

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				importance of key views to features or waymarks within the CNL and responded appropriately through the design and layout of the Scheme.
NE-033	Landscape and Visual	Setting relating to landscape character	Visual impacts are a key consideration when seeking to define the setting of the CNL, in spatial terms, in relation to a particular development. However, as outlined in the CNLB Position Statement on Development in the Setting of the Cotswolds AONB, it also relates to impacts on topics such as landscape. The Government's 'Natural Environment' planning practice guidance states: <i>Land within the setting of these areas often makes an important contribution to maintaining their natural beauty, and where poorly located or designed development can do significant harm. <u>This is especially the case ... where the landscape character of land within and adjoining the designated area is complementary.</u> Development within the settings of these areas will</i>	The Applicant welcomes NEs confirmation that Visual impacts are a key consideration when seeking to define the setting of the CNL. The Applicant disagrees with NEs statement that the character of the landscape adjoining the CNL is complementary to that of the character of the landscape within the CNL itself. This is evidenced by the Landscape Character Assessment for North Wiltshire which identifies the Hullavington Lowlands as a separate character area to those within the CNL – noting that all of the LD Scheme is located within the Hullavington Lowlands Landscape Character Area. This is further expanded upon in the Applicants assessment of effects on the Limestone Lowlands contained within the Limestone Lowlands Character Assessment [REP5-103].

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<i>therefore need sensitive handling that takes these potential impacts into account.³ (N.B. Underlining added for emphasis).</i> In this instance, the landscape character within the CNL and adjoining the CNL is complementary and the currently undeveloped nature of the land outside the CNL, in this location also makes an important contribution to the natural beauty of the CNL. <i>³ Ministry for Housing, Communities and Local Government (2016) Natural Environment (link). Landscape. Paragraph 042.</i>	The Applicants position is that there is a distinct difference in the character of the landscape within the CNL and that within the Scheme, evidenced through the difference in key features such as lack of dry-stone walls, condition, field pattern and land use.
NE-034	Landscape and Visual	Setting relating to landscape character	For example, in this location, the land within and adjoining the CNL, including all of the Lime Down site, forms part of Landscape Character Type 16 (Limestone Lowland), in the Wiltshire Landscape Character Assessment⁴. ⁴ https://www.wiltshire.gov.uk/planning-landscape-conservation. Wiltshire	The Applicant notes these comments and responds in more detail below in its response to NE-036.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<i>Landscape Character Assessment Final Report.</i>	
NE-035	Landscape and Visual	Setting relating to landscape character	The land within and adjoining the CNL (including most of the Lime Down site), in this location, also forms part of National Character Area 107 (Cotswolds).	The Applicant notes these comments and responds in more detail below in its response to NE-036.
NE-036	Landscape and Visual	Setting relating to landscape character	In this regard, it could be argued that the whole of the Lime Down site (i.e. the whole of the order limits) 5, together with the land between the CNL and the Lime Down site, is within the setting of the CNL as it forms part of the same landscape character type (i.e. LCT 16 (Limestone Lowlands). At the very least, the setting should be considered to include those parts of LCT 16 (Limestone Lowlands), outside the CNL, that lie between the CNL boundary and the Lime Down site, as well as those parts of LCT 16 within the site that are visible from the CNL. <i>5 Or at least the section that is covered by National Character Area 107.</i>	The Applicant notes that LCT 16 Limestone Lowlands Landscape Character Type covers a large swathe of north west Wiltshire. The area extends from Bradford-on-Avon in the south to the Kemble Airfield in the far north. The county border constrains the area to the north and west. The boundary to the east is a less distinct transition, occurring with the change in underlying geology from limestone to clay. There is only one character area within the Limestone Lowland Landscape Type, 16A: Malmesbury-Corsham Limestone Lowlands. Given the low level nature of the proposed solar development, and that setting as confirmed by NE above is considered to be related directly to the development in question, the Applicant

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				respectfully disagrees with NE on this point.
NE-037	Landscape and Visual	Setting relating to landscape character	Field patterns are an important part of landscape character. Therefore, if only part of the development within a field would be visible from the CNL, the whole of the field should be considered to be within the setting of the CNL (i.e. the spatially mapped setting should not end in the middle of a field).	The Applicant notes these comments and responds in more detail below in its response to NE-039 to NE-042.
NE-038	Landscape and Visual	Other factors that relate to the setting of the CNL	Other relevant factors include: • The relative tranquillity of the CNL, which is one of the CNL's special qualities. • The dark skies of the CNL, which is one of the CNL's special qualities. • Ecological connectivity.	The Applicant notes these comments and responds in more detail below in its response to NE-039 to -042.
NE-039	Landscape and Visual	Other factors that relate to the setting of the CNL	With regards to tranquillity, the spatially mapped setting should include the area where increased noise levels, resulting from the proposed development (including the construction phase), would be experienced. This should include the area between the noise source and the CNL boundary.	The Applicant confirms that the Tranquillity Assessment - Effects of Construction Traffic on the Cotswolds National Landscape [REP5-099] was submitted into examination at Deadline 5.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
NE-040	Landscape and Visual	Other factors that relate to the setting of the CNL	With regards to dark skies, the proposed development (particularly the construction phase) could result in some degree of sky glow or could introduce lit elements into what would otherwise be a relatively dark night-time landscape, as perceived from viewpoints within the CNL or along its boundary. This should be factored in when spatially mapping the setting of the CNL.	The Applicant directs NE to confirmation from the CNLB that there is sufficient information in the control documents to provide assurance that significant impacts upon the dark skies of the CNL will be mitigated. The Applicant has committed to engage with the CNLB as a Statutory Consultee for aspects of the Detailed CEMP and OEMP within Lime Down A - C.
NE-041	Landscape and Visual	Other factors that relate to the setting of the CNL	With regards to ecological connectivity, the spatial mapping of the setting should include any ecological connectivity between the CNL and the Lime Down site (including areas within the site that form part of this connectivity). This should include the entirety of the fields in which wildflower meadows and wildflower margins are proposed.	The Applicant directs NE to the LEMPs which include proposals for wildflower meadows and margins within the avoidance areas along the edge of the Scheme within the setting of the CNL. The Applicant directs NE to the most recent changes surrounding the removal of the southern section of Field A1, where following a meeting with a representative from the CNLB on the 12 th August 2026 the Applicant has agreed to remove panels from the southern section of the field. The removal of panels from A1 results in the removal of potential Significant Effects to receptors on the edge of the National

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Landscape aligning with the position taken to remove panels from Field C9 (also at the request of the CNLB). It has been agreed between the Applicant and the representative from the CNLB that the proposed woodland belt dividing the field would no longer be included allowing for the whole of Field A1 to be bought forward as wildflower meadow to provide additional positive enhancement within the setting of the CNL. A historic hedgerow is proposed to be reinstated along the northern boundary of Field A2 to provide mitigation of views of panels within Field A2, with panels in Field A2 shifted to the south to accommodate the required buffers from the new hedgerow in this location.
NE-042	Landscape and Visual	Setting – construction phase / operational phase	Setting – construction phase / operational phase The proposed development is likely to have different impacts during the construction phase compared to the operational phase. For example,	The Applicant has identified the setting of the CNL to be defined by the area within which development and land management proposals, by virtue of their nature, size, scale, siting materials or design can be considered to have an

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			there are likely to be more vehicle movements, more noise, more lighting and, potentially, large machinery (which could be more visible than the solar panels themselves), such as cranes, during the construction phase. As such, the setting of the CNL, in relation to this particular development, could potentially be larger during the construction phase than during the operational phase. On this basis, it may be appropriate to define the setting of the CNL separately, in spatial terms, for the construction phase and operational phase. If just one spatial definition of the setting is used, this should address both the construction phase and the operations phase, not just the operational phase.	impact, positive or negative, on the landscape, scenic beauty and special qualities of the CNL. In identifying the setting the Applicant has been minded to the different phases of the development process, eg construction, operation and decommissioning.
NE-043	Landscape and Visual	LV2.6 – Effects to the Cotswolds National Landscape and its	<i>The ExA notes that the SoCG between the applicant and Natural England [REP4-063] states Natural England's position that the proposed development is unlikely to result in significant adverse impacts to the CNL when considered alone. Natural</i>	The Applicant notes this comment and directs to its response to LV2.2 above.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		Special Qualities	<i>England's attention is drawn to the submissions from the CNLB at D3 [REP3-153 and REP3-154] in which the CNLB concludes that the proposed development would have a net adverse effect on the special qualities of the National Landscape.</i> <i>Natural England is asked to comment on whether it agrees with the CNLB's position or the applicant's position on the special qualities of the CNL?</i> Natural England understands that the special quality of most concern for the CNLB in relation to the proposed solar scheme is that of tranquillity. It is understood that the effects of construction traffic through the CNL during construction and decommissioning are likely to have the most significant impact on tranquillity. Please refer to our comments in response to LV2.2 on this matter.	
NE-044	Landscape and Visual	LV2.6 – Effects to the Cotswolds National	We also understand that a further assessment of the impacts on tranquillity is to be provided by the applicant. Natural England request	The Applicant confirms that the Tranquillity Assessment - Effects of Construction Traffic on the Cotswolds National Landscape

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		Landscape and its Special Qualities	access to this report to assess whether the conclusions are reasonable.	[REP5-099] was submitted into examination at Deadline 5.
NE-045	Landscape and Visual	LV2.6 – Effects to the Cotswolds National Landscape and its Special Qualities	Based on the applicant's assessment of the potential effects of the proposed development on the special qualities of the National Landscape and the CNLB comments from ExA Second Written Questions, Natural England consider that the scheme is unlikely to result in significant adverse impacts on the remaining special qualities.	The Applicant welcomes this comment.
NE-046	Landscape and Visual	LV2.6 – Effects to the Cotswolds National Landscape and its Special Qualities	<i>Natural England is also asked to confirm if it considers that the applicant has demonstrated that there would not be cumulative effects on the National Landscape that would increase effects identified when considering the project alone?</i> Natural England understands that the applicant hasn't identified any development sites which will have a cumulative effect on the CNL or its setting in its cumulative assessment. Therefore, no further information is requested on this matter.	The Applicant welcomes NEs confirmation that other than Special Quality – Tranquillity (the tranquillity of the area away from major sources of inappropriate noise, development, visual clutter and pollution), no other Special Qualities would be significantly impacted by the Scheme. The Applicant confirms that the Tranquillity Assessment - Effects of Construction Traffic on the Cotswolds National Landscape [REP5-099] was submitted into examination at Deadline 5.

The Applicant's Response to Submissions Received at Deadline 5

EXAM/9.69

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				The Applicant notes NEs confirmation of no further information regarding Cumulative Assessments is required.

3.5 National Highways

Table 3-7 National Highways: Response to the ExA's Second Written Questions

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
NH-001	Description and DCO Process	Detrunked Plots	1 Introduction 1.1 This is a response by National Highways Limited ("NH") to the Examining Authority's second written questions and requests for information (ExQ2) issued on Monday 27 July 2026. Since the response provides a general update on outstanding issues NH does not intend to submit separate submissions responding to the Applicant's submissions made at Deadline 4. 1.2 The only other point of note from the Deadline 4 submissions, and that is not covered by ExQ2, is the Applicant states it has amended the Book of Reference to delete plots which have been de-trunked and to note that for the Side Roads Order Plots, NH's interest is only the subsoil. However, from	The Applicant acknowledges National Highways comments and confirms all plots identified as requiring change by National Highways have been updated and can be viewed within Revision 4 of the Book of Reference submitted in August.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			NH's reading of the Book of Reference, the Detrunked plots have not been removed entirely as NH would expect (see plots 13-05, 13-06, 13-08, 13-09, 13-12, 13-013, 13-014, 13-016, 20-001, 20-002, 20-003) and not all the side road order plots have been updated to refer to subsoil only (21-003, 21-004, 21.006 and 21-007).	
NH-002	Description and DCO Process	Protective Provisions	2 Response to ExAQ2 <i>DCO2.1 Residual Issues with the dDCO and Management Plans The dDCO is an important document and the ExA is under a duty to provide the SoS with a recommended version of the DCO. This is because the SoS is the decision maker. Therefore, even if the ExA were to recommend to the SoS that development consent should not be granted, the ExA must still append a recommended version of the DCO, thus it is important that the ExA is able to put forward the best DCO that it can.</i>	The Applicant notes the response from National Highways and is in the final stages of negotiations with National Highways regarding the draft Side Agreement and still anticipates this will be agreed prior to the close of Examination. The Applicant has updated the protective provisions at Deadline 6 to clarify the provision of information relating to hedgerow and tree removal and replacement.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<i>The dDCO has been revised four times during the examination to date. A proportion of what has been requested by interested parties has been included in the Order, another proportion has been addressed through the updating of associated management plans, and other elements the applicant has resisted with reasons. While the position of many interested parties and/or statutory undertakers may be that development consent should not be granted, without prejudice to your position, you are invited to:</i> <i>1) Outline any remaining or residual issues that you have with any articles, requirements or schedules of the dDCO, set out why the applicant has not yet resolved your concerns or why you are not content with the applicant's justification, and define what remedy or solutions you are seeking (including suggested redrafting if applicable) to address your concerns, and explain (make your case) why the applicant, the ExA</i>	

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<i>and the SoS should consider such amendments to the dDCO. Statutory Undertakers are also alerted to ExQ2 DCO2.23 which specifically relates to protected provisions.</i> <i>2) Outline any remaining or residual issues that you have with any of the management plans/ documents listed below, set out why the applicant has not yet resolved your concerns or why you are not content with the applicant's justification, and define what remedy or solutions or amendments you are seeking to address your concerns within the drafting of the relevant management plan(s)/ document(s):</i> <i>Outline Construction Environmental Management Plan (Latest Version, Revision 5 [REP4-049])</i> <i>• Outline Operational Environmental Management Plan (Latest Version, Revision 5 [REP4-051])</i> <i>• Outline Decommissioning Strategy (Latest Version, Revision 3 [REP3-096])</i>	

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			• <i>Outline Soil Resources Management Plan (Latest Version, Revision 2 [REP3-098])</i> • <i>Outline Site Waste Management Plan (Latest Version, Revision 2 [REP1-102])</i> • <i>Outline Public Rights of Way and Permissive Paths Management Plan (Latest Version, Revision 1 [APP-282])</i> • <i>Outline Landscape and Ecological Management Plan (Latest Version, Revision 2 [REP3-100])</i> • <i>Outline Ecological Protection and Mitigation Strategy (Latest Version, Revision 4 [REP4-055])</i> • <i>Outline Skills, Supply Chain and Employment Plan (Latest Version, Revision 1 [APP-285])</i> • <i>Outline Battery Safety Management Plan (Latest Version, Revision 3 [REP3-106])</i> • <i>Outline Construction Traffic Management Plan (Latest Version, Revision 4 [REP4-057])</i> • <i>Outline Archaeological Mitigation Strategy (Latest Version, Revision 1 [APP-230])</i>	

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			• <i>Outline Drainage Strategy (Latest Version, Revision 4, [REP4-021, REP4-023, REP4-025, REP4-027, REP4-029, REP4-031, REP4-033, REP4-035])</i> • <i>Outline Water Resources Strategy (Latest Version, Revision 1 [APP-290])</i> 1) On the dDCO the Applicant and NH have agreed additional details to be provided within the protective provisions for NH within Part 5 of Schedule 15 requiring details of any hedgerows and trees that are required to be removed or anticipated to be impacted by the cable or road works, details of any replacement hedgerows and trees and details of tree and hedgerow protective fencing. The changes required are the insertion of the following wording into the definition of detailed design information for both the road works and cable works:	

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<i>"where relevant, details of any hedgerows and trees that are required to be removed or anticipated to be impacted by the [cable][road] works, details of any replacement hedgerows and trees and details of tree and hedgerow protective fencing;"</i>	
NH-003	Description and DCO Process	Changes to Articles	There are further changes to the list of articles that only should be exercised with NH's consent and which should be added to paragraph 53(3) and the rationale for these is explained in DCO2:23 below: • article 11 (construction and maintenance of altered streets); • article 25 (private rights); • article 33 (statutory undertakers); • article 34 (Apparatus and rights of statutory undertakers in closed or restricted streets); and • article 38 (Application of landlord and tenant law). Within ExQ2 the Examining Authority has noted National Highways'	Please see response to NH-002 above.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			other requests: The inclusion of trees reference N/TPO7 in Schedule 12 and the addition of a definition of relevant highway authority in Article 2.	
NH-004	Description and DCO Process	Requirements	In respect of Requirements: Requirement 3, NH maintains its position that National Highways should be given an opportunity to review any variations to the approved documents and plans to ensure that any changes do not adversely impact the SRN. This is in the interest of maintaining the safe and efficient operation of the SRN Inclusion of drafting in red would address National Highways' concern. "Requirement 3 (1) The undertaker may submit any amendments to any approved document to the relevant planning authority for approval in consultation with National Highways and, following approval, the relevant approved document is to be taken to include the	Please see response to NH-002 above.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			amendments approved under this paragraph."	
NH-005	Description and DCO Process	Requirements	Requirement 5 needs to be expanded to include reference to works no 5a to ensure that it specifically includes the cable crossing works across the M4 that will also require the approval of National Highways prior to the commencement of those works. In addition, the works must be in accordance with DMRB standards. The inclusion of drafting in red would address National Highways' concern. "Requirement 5 5. No part of Work Nos. 1, 2 or 3 or 5a may commence until details of— (a) the layout; (b) scale; (c) proposed finished ground levels; (d) external appearance; (e) hard surfacing materials; and (f) vehicular and pedestrian access, parking and circulation areas, relating to that part have been submitted and approved by the	Please see response to NH-002 above.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			relevant planning authority for that part. (5) Works No 5a must be carried out in accordance with The Design Manual for Roads and Bridges (DMRB) Chapter CD622 (Managing Geotechnical Risk).	
NH-006	Transport and Access	OEMP	2) On the management plans the Applicant has agreed to insert the following wording into the Operational Environmental Management Plan: <i>"The Applicant will engage with National Highways where any of the operational activities are proposed within close proximity or adjacent to the Strategic Road Network (SRN) or that could have an impact on the SRN including (without limitation) replacement activities. The Applicant will also consult National Highways if there are any changes or amendments to the operational environmental management plan that relate to operational activities within close proximity or adjacent to the Strategic Road Network (SRN) or that could have an impact on</i>	The Applicant has added a requirement to consult with National Highways in respect of the Outline OEMP [REP5-073] .

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
NH-007	Ecology and Biodiversity	OEPMS	Similar wording is also to be included in the Outline Ecological Protection and Mitigation Strategy: <i>"The Applicant will engage with National Highways in relation to those parts of the ecological protection and mitigation strategy which relate to land within close proximity or adjacent to the Strategic Road Network (SRN) or that could have an impact on the SRN. The Applicant will also consult National Highways if there are any changes or amendments to the ecological protection and mitigation strategy which relates to land within close proximity or adjacent to the Strategic Road Network (SRN) or that could have an impact on the SRN."</i>	The Applicant added a requirement to consult with National Highways in respect of the Outline EPMS [REP5-081] at Deadline 5.
NH-008	Transport and Access	CTMP	With those insertions (and noting the ExA's addition requested to the Outline Construction Traffic Management Plan (ExQ2 TT2.4) NH has no further issues on the management plans/ documents listed.	Please refer to the Applicant's Response to Second Written Questions [REP5-097] at TT2.4, which explains why the Applicant does not consider a change to the Outline CTMP is required on this point.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
NH-009	Description and DCO Process	Protective Provisions	<i>DCO2.27 Protected Provisions for National Highways</i> <i>In response to ISH4 Action Point 9 [REP4-087] the applicant provided a summary of negotiations with statutory undertakers on protected provisions. The ExA notes the applicant's statement that it is confident that protected provisions with National Highways will be agreed prior to the close of the examination. However, National Highways in its deadline 4 submission [REP4-098] states that whilst National Highways is content in principle with the protected provisions and Side Agreement reflecting the position agreed at Green Hill, National Highways has made it clear to the Applicant that there are scheme specifics that need to be agreed before NH is in a position to formally agree the PP's. Following NH's in principal approval, progress with the Applicant on requirements has been minimal (ref NH-007).</i>	Please see response to NH-002 above.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<i>Notwithstanding ExQ2 DCO2.15 and DCO2.23 above, the ExA would welcome an honest and realistic position from the applicant and National Highways on the likelihood of agreeing protected provisions for Lime Down before the anticipated close of this examination on 21 October 2026, particularly noting the absence of any updates to the SoCG since deadline 2 [REP2-030].</i> NH can confirm that the protective provisions and side agreement that are in discussion with the Applicant are largely agreed subject to the changes highlighted in the response to ExQ2 DCO2.1.above. NH needs, however, to be satisfied that all its concerns have been addressed so that NH is certain that no further changes to the protective provisions are required. An update on NH's outstanding concerns is set out below and based on that update NH is highly confident that the protective provisions will be capable of being agreed in advance at the anticipated close of this examination on 21	

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			October 2026. Updates to the Statement of Common Ground are being progressed.	
NH-010	Description and DCO Process	Requirements	By way of update: On the requirements where NH has sought to be a consultee and the Applicant has resisted this i.e.: R7 – landscape and ecological management plan R8 – ecological protection and mitigation strategy R10 (1) and (2) – fencing and other means of enclosure R11 – Surface and foul water drainage R13 – construction environmental management plan R14 – operational environmental management plan there is now agreement that NH's concerns will be addressed through updates to the relevant outline management plans as set out in NH's response to EXQ2 DCO2.1 above. NH's comments on Requirement 3 and 5 remain.	The Applicant added a definition of 'relevant highway authority' to the Draft DCO [REP3-005] submitted into Examination at Deadline 3. National Highways, as 'relevant highway authority' will be consulted on the discharge of: - Requirement 15 (construction traffic management plan (CTMP)) - Requirement 16 (public rights of way and permissive paths) - Requirement 20 (decommissioning and restoration). NH must also be consulted in respect of measures in the detailed Construction Environmental Management Plan (CEMP) where these are located in the vicinity of the SRN, to ensure no adverse effects are caused to the SRN. This requirement is included in the Outline CEMP [REP5-071], and provides proportionate consultation on

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				matters close to the SRN. The Applicant added similar provisions to an updated Outline OEMP [REP5-073] in respect of replacement activities. In addition, the Applicant added a requirement to consult with National Highways in respect of the Outline EPMS [REP5-081] at Deadline 5. The Applicant has included updated wording at Schedule 16 (Procedure for the discharge of requirements) to the Draft DCO [REP5-012] which requires that, in respect of an application to amend an approved document under Requirement 3, any named consultees must also be consulted in relation to the approval of that amended document. This followed discussions between the Applicant and National Highways. As such, National Highways will be consulted on any amendments to the final CTMP, public rights of way and permissive paths management plan and decommissioning strategy (pursuant to Requirements 15, 16 and 20 respectively).

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
NH-011	Construction and Decommissioning	Works 5a	On the geotechnical specification for directional drilling in relation to Works 5a, NH can confirm that the Applicant's submission at Deadline 4 responding to NH's Deadline 3 submission is correct i.e. <i>"comments and documentation for the CD622 M4 HDD crossing have been accepted by National Highways, and the Applicant is currently on finalising the submission pack for formal acceptance."</i>	The Applicant notes this comment.
NH-012	Description and DCO Process	Book of Reference	This just leaves an outstanding Information Request relating to several plots being included in the Book of Reference as a consequence of drainage and gully apparatus, easements, and conveyances. In relation to these plots, NH's position is that the additional information requested is still required to enable NH to understand the impact of any interference with drainage and gully apparatus, easements, and conveyances. In this regard the shapefiles, which the Applicant has agreed to provide, are awaited.	The Applicant acknowledges the information request and will provide the utility data for National Highways assessment prior to Deadline 7, and any relevant changes will be included in the Book of Reference submitted at Deadline 7.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
NH-014	Description and DCO Process	Protective Provisions	<i>DCO2.23 Status and Proposed Revisions</i> <i>As per the examination timetable, all Statutory Undertakers and Wiltshire Council are requested to submit their proposed version of protective provisions that they wish to see included for their benefit in the dDCO but have not been agreed by the applicant.</i> <i>Please also set out why you are not content with the applicant's version in Schedule 15 of Revision 4 of the dDCO [REP4-004], and explain why the ExA and Secretary of State should prefer your suggested drafting.</i> Please see response to DCO2.1 above in terms of the amendments required to the protective provisions for the benefit of NH.	Please see response to NH-002 above.
NH-015	Description and DCO Process	Protective Provisions	In terms of the justification for the additional articles to be inserted into paragraph 53(3), as explained in NH's Written Representation [REP1-154] :	Please see response to NH-002 above.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			Article 11 (construction and maintenance of altered streets): NH do not agree to deemed adoption and the Applicant would need to comply with the adoption and maintenance provisions included in NH's standard proposed protective provisions. The undertaker should not be able to absolve itself from responsibility in the way proposed by the article. The applicant should be required to obtain NH's consent in the event the activities affect the strategic road network or any land NH has an interest in.	
NH-016	Description and DCO Process	Article 25	Article 25 (private rights) NH objects to the power to compulsory acquire rights/private rights without its consent. NH must have control over operations on its network for safety purposes. The Applicant should be required to obtain NH's consent in the event any access or works under this article affect the SRN or any land in which NH has an interest.	Please see response to NH-002 above.
NH-017	Description and DCO Process	Article 33	Article 33 (statutory undertakers) NH maintains that the Applicant should be required to obtain NH's consent in the event the activities	Please see response to NH-002 above.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			affect the SRN or any land in which NH has an interest.	
NH-018	Description and DCO Process	Article 34	Article 34 (Apparatus and Rights of Statutory Undertakers in Closed or Restricted Streets): This article cross-refers to articles 8, 10, 11 and 12. NH's requires further information to assess the impact of the scheme on its interests in relation to those articles. The Applicant should obtain NH's consent before exercising any powers that affect the SRN. information to assess the impact of the scheme on its interests in relation to those articles. The Applicant should obtain NH's consent before exercising any powers that affect the SRN; and	Please see response to NH-002 above.
NH-019	Description and DCO Process	Article 38	Article 38 (Application of Landlord and Tenant Law): NH does not have sufficient information to assess whether this article is likely to affect its interests.	Please see response to NH-002 above.

3.6 National Grid Electricity Transmission PLC (NGET)

Table 3-8 National Grid: Response to the ExA's Second Written Questions

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
NGET-001	Description and DCO Process	Protective Provisions	In its submission at Deadline 3 [REP3-148] , NGET confirmed that if protective provisions are not agreed by Deadline 5 NGET would provide a version of protective provisions it requires to be included in the Order. The form of protective provisions are not yet agreed and so NGET's preferred form of protective provisions are appended to this document.	The Applicant awaits comments from NGET on a draft side agreement and protective provisions that it provided on 12 June 2026. NGET has provided comments on protective provisions to the Applicant on 7 August 2026. The Applicant awaits comments from NGET on the draft side agreement and intends to provide a further update on protective provisions once it receives comments on the side agreement.

3.7 Avon Fire and Rescue Service

Table 3-9 Avon Fire and Rescue Service: Any further information requested by the ExA

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
AFRS-001	Other Environmental Matters - Major Accidents and Disasters	BESS fire safety	AF&RS acknowledges the national policy supporting renewable energy but holds no views on Wiltshire County Council's climate strategy, local policies or the suitability of a development/location. As neighbours in this case to the development our interest is limited to ensuring sufficient access in the event of an emergency, be it either during construction or operation, people safety, plus mitigation for environmental damage to the landscape, biodiversity, and air. As such minimum legislated widths and road access needs to be applied and a good water supply should be readily available at scene or upon request, to deal with a B.E.S.S. fire. The degree of container separation and other measures required to avoid thermal runaway, appropriate arrangements to deliver huge amounts of cooling water, firefighter safety and the environmental impact of thousands of	The Applicant notes AF&RSs response regarding fire safety. With regards to access in the event of an emergency, the BESS site is located within a seven-minute journey of the Strategic Road Network and is accessible to emergency vehicles. A separate emergency access to the BESS site is also provided in accordance with guidance set out by the National Fire Chiefs Council. An Outline Battery Safety Management Plan (BSMP) [REP3-106] has been prepared for the Scheme using guidance from Dorset and Wiltshire Fire and Rescue Service and incorporating recommendations of the National Fire Chiefs Council. The Outline BSMP [REP3-106] ensures that risks associated with battery storage are appropriately mitigated. The Outline BSMP [REP3-106] includes details around minimum road widths (6m) for emergency access and also firefighting water requirements.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			gallons of contaminated water must be considered and accounted for.	Furthermore, at Deadline 3 the Applicant produced 9.8 Firewater Containment and Drainage Strategy - Lime Down D Battery Energy Storage System [REP3-118] which provides the approach to the containment, isolation, management and disposal of firefighting water, suppression water and associated incident runoff within the BESS.

3.8 Dorset and Wiltshire Fire and Rescue Service

Table 3-10 Dorset and Wiltshire Fire and Rescue Service: Response to the ExA's Second Written Questions

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
DWFRS-001	Other Environmental Matters	Water Resourcing	Dorset and Wiltshire Fire and Rescue Service are requested to consider the applicant's response to the Examining Authority's (ExA's) ExQ1 specifically AQ1.3 [REP3-128], and in addition to doing so provide a response to the following: <i>1. During a thermal runaway event advise where would the secondary water source come from once the on-site water storage units are empty.</i> As is the case with all other fire incident types, the Fire and Rescue Service (FRS) has access to water supplies from the hydrant network or other supply provided by water undertakers or other persons in line with the duties and powers conferred or imposed under Section 38-42 of the Fire and Rescue Services Act 2004. DWFRS would implement appropriate actions to transport water	The Applicant notes this comment. As stated in the Applicant's Response to AQ1.3, the firefighting water requirement will be fully assessed at detailed design based upon a comprehensive review of the fire and explosion test data for the selected BESS system by an independent Fire Protection Engineer. The required on-site firefighting water provision will be agreed with the Fire and Rescue Service. The Applicant will provide sufficient firefighting water on site for the credible design fire scenario, established through the selected BESS system test data and consequence modelling, in accordance with the applicable NFCC Guidance and in consultation with DWFRS. On this basis, the Applicant considers it extremely unlikely that a secondary water source would be required.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			via fire appliances or pumps as required, including use of additional equipment supplied under Section 13/16 arrangements or National Resilience measures.	Where further firefighting or cooling water is nevertheless required, the detailed BSMP will identify the response arrangements available to DWFRS. Where appropriate and confirmed as suitable for the firefighting response, this may include recirculation and reuse of firefighting water already captured within the isolated BESS drainage and containment system. This provides a practical means of extending the available firefighting water supply without introducing an additional volume of water to the containment system. If an additional external water source is ultimately required, DWFRS has confirmed that it has access to secondary supplies through hydrants and other sources and can transport water using fire appliances or pumps as required. The final containment system will be sized to accommodate the on-site firefighting water volume established for the credible design fire scenario, together with the applicable concurrent rainfall allowance, without uncontrolled

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				discharge to ground or surface water. The permanent drainage and containment system is therefore designed around the defined on-site firefighting water and rainfall requirements and is not sized for an undefined additional volume of externally supplied water. Any requirement for secondary water would be addressed through the detailed BSMP and emergency response arrangements. The Applicant is in discussion with the Environment Agency to establish their preferred strategy to minimise pollution risks in the unlikely scenario that all firefighting water on site has been discharged from the hydrant network.
DWFRS-002	Other Environmental Matters	Availability of Appliances	2) <i>Provide detail on how many fire appliances the fire service would have available at any one time in the likely event of a fire at either a single or multiple containers and would this be sufficient to deal with any thermal runaway event.</i>	The Applicant notes this comment.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			Availability of appliances at any given time cannot be accurately determined. Normal mobilising arrangements would provide operational cover from adjacent station areas with options to enhance response from neighbouring FRS utilising Section 13/16 Fire and Rescue Services Act 2004 if required. National Resilience assets could also be called upon in the event of protracted deployment. UL9540A testing, along with other engineering controls should reduce the likelihood of fires involving multiple BESS containers. Firefighting tactics in the event of thermal runaway are predicated upon defensive protection of adjacent containers or infrastructure and at this time DWFRS are content that suitable arrangements are in place to deal with an incident of this nature.	
DWFRS-003	Other Environmental Matters	Emergency Access Routes	<i>3) Whether the fire service has had any discussions with the applicant and/ or local highway authority about emergency access routes to the BESS enclosure.</i>	The Applicant notes this comment and confirms that BESS site access requirements were agreed with D&WFRS.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			Access routes to the BESS compound were discussed with the applicant during initial design stages to align design with the recommendations of the NFCC planning guidance and Approved Document B to the Building Regs as far as possible. Aspects of road width, load bearing capacity and passing/turning places have been reiterated. No direct communication between DWFRS and the Highways Authority have taken place in respect of this development.	

3.9 Stop Lime Down

Table 3-11 Stop Lime Down: Comments on Deadline 4 Submissions

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
SLD-001	Landscape And Visual	Alternative Access to the PRoW of Way Network	SLD note the contents of this technical note, but does not agree with its assessment. SLD have already commented at length on the likely impacts of the scheme on the PROW network.	The Applicant notes this comment and is confident in its position that the Technical Note on Alternative Access to the Public Rights of Way Network [REP4-080] robustly supports the assessment outcomes of ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068] . This position is that the Scheme does not have a significant adverse effect on the local PROW network overall, and that there is no significant adverse effect on surrounding PROWs as a result of displacement. This is subject to the implementation of design and management measures as secured through the Design Principles and Parameters [REP4-043] , the Outline Landscape and Ecological Management Plan [REP5-079] and the Outline Public Right of Way and Permissive Paths Management Plan

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				[REP1-104] by Requirements 5, 7, and 16 of Schedule 2 to the Draft DCO [REP5-012] .
SLD-002	Landscape and Visual	PRoW – LVIA and acoustics	In particular, [REP1-169], SLD's Landscape and Visual Impact Report, includes an assessment of amenity effects during the lifetime of the Scheme and [REP1-179], SLD's Acoustic's Report addresses noise effects on the PROW network. Additionally, the layered map produced by SLD offers a helpful way of considering cumulative effects on individual PROWs [REP1-188].	The Applicant confirms that it has reviewed the layered map produced by SLD [REP1-188]. The Applicant notes this comment and is confident in the findings of the LVIA set out in ES Volume 1, Chapter 8: Landscape and Visual [REP3-025] which recognises the change to the visual amenity and associated adverse effects to users of those PROW that are located within the array itself or directly adjacent. The design of the Scheme has embedded buffers into the proposed layout, specifically a 15m offset to any proposed infrastructure on either side of any PROW. Where PROW directly cross the array, this creates a corridor with a minimum width of 30m wide between proposed fencelines through the array. There would then be a gap of 4m between the fence line and the proposed panels resulting in a

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				minimum total width of 38m between the panels where PRow cross the arrays.
SLD-003	Landscape and Visual	PRow – level of use	Useful evidence of many of the routes regular use has also been provided in SLD's Public Rights of Way Survey [REP1-187]. As discussed at the previous hearing, SLD does not agree with the Applicant's various statements that the PRow network is under utilised in areas. Many of these statements are based off single visits, as opposed to lived experience residing within the area.	The Applicant notes this comment, and is confident in its position that the Technical Note on Alternative Access to the Public Rights of Way Network [REP4-080] robustly supports the assessment outcomes of ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]. Whilst the Applicant recognises the extent of responses provided in SLD's Written Representation, Appendix Y (Lime Down Public Rights of Way Survey) [REP1-187], this does not necessarily oppose the Applicant's position that there is a high level of variation in the use of individual PRows within the local PRow network overall. Whilst site visits made by the Applicant have been on occasion and by different members of the Applicant team rather than continuously by the

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				same person, these nevertheless provide a good overarching understanding of the level of use of the routes affected by the Scheme.
SLD-004	Landscape and Visual	PRoW – camera survey methodology	Also in this regard, the SLD is aware that cameras were placed by the Applicant at various points (including around Ladyswood Farm). SLD has significant concerns about the locations chosen for those cameras given the typical walking routes undertaken by locals, and also the weather conditions when this analysis was undertaken. SLD will comment on the figures resulting if and when they are submitted to the Examination.	The Applicant has submitted the Highways Technical Note – Non-Motorised User Surveys [EN010168/EXAM/9.70] at Deadline 6 which presents the data collected from NMU survey cameras. It is noted that SLD has concerns regarding the survey and that comments will be provided.
SLD-005	Transport and Access	Abnormal Load Routes (ES Vol 2, Figure 13-5)	██████ notes that the alternative AIL route to Areas A and C that approaches from the south at Grittleton crossroads has been removed. All AIL vehicles would therefore need to make the left turn at Grittleton crossroads to enter Alderton Road.	The Applicant refers SLD to its response given to TT2.8 in the Applicant's Response to the Examining Authority's Second Written Questions [REP5-097] which considers the Grittleton crossroads AIL swept path.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				The Applicant can confirm that the AIL vehicle that will be utilised is specifically configured with a tractor unit at both the front and rear of the trailer. This arrangement provides significantly enhanced manoeuvrability. AILs require a special movement order and therefore, fall outside the DCO.
SLD-006	Transport and Access	Abnormal Load Routes (ES Vol 2, Figure 13-5)	██████ notes that this issue has been picked up at the ExA's Second Written Questions TT2.8 and will review the Applicant's response and respond when able.	The Applicant makes note of this comment. See TT2.8 of the Applicant's Response to the Examining Authority's Second Written Questions [REP5-097] .
SLD-007	Transport and Access	Abnormal Load Routes (ES Vol 2, Figure 13-5)	The point is made by the ExA that there is no swept path analysis showing how the AIL vehicle could make the left turn into Alderton Road and details are requested of a possible manoeuvre whereby the AIL vehicle turns right towards Yatton Keynell, the tractor unit unhitches, re-hitches to the rear of the trailer unit and continues north along Alderton Road.	The Applicant can confirm that a tractor unit is located at either end of the trailer. Swept path analysis was undertaken at Alderton Road and is shown in Drawing PL404 revision A in Annex H of ES Volume 3, Appendix 13-1 Transport Assessment [REP5-061] and Appendix E of the Outline CTMP [REP5-083] .

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
SLD-008	Transport and Access	Transport Assessment	The updated Transport Assessment includes the provision of new drawings PL302-308 in Annex I. SLD's comment on these drawings is set out in more detail below in its response to TT2.9. In summary, [REDACTED] has expressed doubt in respect of the dimensions presented in these plans. [REDACTED] undertook measurements at two sites and noted significant differences between the measurements presented and the measurements taken on site.	The Applicant's survey data was undertaken by experienced independent survey companies, using the most up-to-date and sophisticated Trimble Robotic surveying equipment, GPS Glonass receivers and Faro 3D scanners along with the latest data collection technologies available. The survey is carried out in accordance with BSENISO9001:2000. Unless the SLD survey has been undertaken with this level of accuracy, it is unlikely the measurements will match.
SLD-009	Transport and Access	Transport Assessment	[REDACTED] reported technical difficulties reviewing these plans, and this was part of the matters for discussion at the meeting between the experts on 3 August [REDACTED] will provide further information in respect of them when able, but repeats the concern regarding the measurements provided in the plans.	The Applicant makes note of this comment.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
SLD-010	Transport and Access	Outline CTMP – use of banksmen	The access drawings in Annex A indicate that banksmen would be used at 21 access points. The description of works in Tables 2 and 3 indicate that banksmen would be used at 9 access points. The Applicant needs to provide clarity because the use or otherwise of banksmen has important implications with regards to highway safety and the amount of roadside vegetation that would be lost to achieve visibility splays.	As confirmed in Paragraph 2.1.5 and 2.2.3 of the Outline CTMP [REP5-083] , the Applicant can confirm that banksmen will be provided at every access whenever construction vehicles are accessing or egressing the Site as they are a health and safety requirement for the contractor. Further detail of the works required at each access are set out in Tables 2 and 3 as stated by SLD.
SLD-011	Transport and Access	Outline CTMP – vegetation loss	The Applicant has yet to provide an estimate of the amount of roadside vegetation that would be lost through the need to achieve safe visibility splays.	Proposed hedgerow losses are set out within the Hedgerow Removal Plan in Annex A of the Outline EPMS [REP5-081] , specifying minimum and maximum extents of hedgerow removal at each location. This take into account requirements for loss of hedgerows to achieve safe visibility splays
SLD-012	Transport and Access	Outline CTMP – missing drawing	Drawing PL21-B (emergency access to Lime Down D from Hill Hayes Lane) is not provided in Annex A	Drawing PL215-B has been included in the submission at Deadline 6 in Appendix A of the Outline CTMP [EN010168/APP/7.22] which shows

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			although it is listed in Table 2 with a drawing reference number.	the emergency access to Lime Down D.
SLD-013	Transport and Access	Technical Note on Alternative Access to ProWs	The Technical Note fails to consider the potential adverse highway safety impacts on users of Footpaths HULL29 (joins western side of Bradfield Cottages south of railway) and HULL5 (joins eastern side of Bradfield Cottages north of railway line) during construction.	The Applicant has undertaken individual assessments of footpaths HULL5, and HULL29 in ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241], which specifically states "increased HGV traffic at road crossings" as a construction impact. The assessment of these footpaths draws on the assessment of ES Volume 1, Chapter 13: Transport and Access [REP4-014] to determine the extent of effects to users. The assessment confirms up to a medium-term temporary moderate-minor adverse to these routes during construction, which is not a significant effect. Furthermore, the Technical Note on Alternative Access to the Public Rights of Way Network [REP4-080] specifically considered the current and likely future use of the road at

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Broadfield Cottages as a dissuading factor to PROW usage of HULL2, HULL4, and HULL5 (see paragraph 2.3.8).
SLD-014	Transport and Access	Pedestrian exposure to HGVs	Users of these rights of way are required to walk along the section of Bradfield Cottages that is predicted to carry significant numbers of HGVs and has no footways and limited verges.	The Applicant is aware of the conditions for non-motorised users on this piece of the highway network and has used this understanding in its assessment of impacts in ES Volume 1, Chapter 13: Transport and Access [REP4-014] and ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068]. The Applicant acknowledges that the Scheme will increase HGV movements at this location, however, does not consider the quantum of additional HGVs at this location would significantly change the experience of fear and intimidation, or actual safety, to non-motorised users. A new NMU survey was undertaken on Bradfield Cottages the results have been submitted within the Highways Technical Note – Non-Motorised

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				User Surveys [EN010168/EXAM/9.70] at Deadline 6 and shows low numbers of pedestrian movements along this route.
SLD-015	Transport and Access	Applicant's Response to Submissions Received at Deadline 3 - HGV numbers assessment	SLD-006: It remains unclear whether the Applicant is suggesting that construction HGV numbers represent a worst case for the purposes of environmental assessment since it is suggested that the Final CTMP may identify higher flows.	The Applicant can confirm that the vehicle numbers that have been assessed represent a worst-case scenario.
SLD-016	Transport and Access	Council Post-hearing Submissions – passing bays	Paragraphs 4.15 to 4.18 refer to passing bays and spacing. Queries are raised about the adequacy of forward visibility between passing opportunities.	Revised drawings have been submitted at Deadline 6 which includes revisions to SP50, SP52, SP54 and SP55 in Annex K of the ES Volume 3 Appendix 13-1 Transport Assessment [EN010168/APP/6.3] (Revision 6).
SLD-017	Transport and Access	Council Post-hearing Submissions – forward visibility	The Applicant does not appear to have provided forward visibility measurements on the latest drawings that show the proposed works within the HIAs.	Intervisibility was included in previous drawings, however due to additional topographical survey being added revised drawings have been submitted in updated versions of the Outline CTMP [EN010168/APP/7.22] (Revision

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				6) and ES Volume 3 Appendix 13-1 Transport Assessment [EN010168/APP/6.3] (Revision 6) at Deadline 6, these also include intervisibility. Revised drawings have been submitted at Deadline 6 which includes revisions to SP50, SP52, SP54 and SP55 in Annex K of the ES Volume 3, Appendix 13-1 Transport Assessment [EN010168/APP/6.3] (Revision 6).
SLD-018	Transport and Access	Applicant's Response to Other Parties' Responses to ExAQ1 (TT1.7)– construction worker numbers	The Applicant attempts to justify the distribution of construction workers that have been split in proportion to the solar array areas. Assuming the peak number of construction workers (622) this would lead to 32.7% being assigned to Area D, equivalent to 203 workers.	The Applicant can confirm that worker trips were based on a breakdown provided by a contractor based on the draft layouts and programme. The peak worker trips in a month (622) were distributed to all sites proportionally based on areas. Resulting in 295 workers in A, B and C and 327 workers in D and E. A check was done to see if the daily peaks within any months exceeded these trips. It was found that they were lower with 289 workers in A, B and C and 313 in D and E.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				This peak worker was assumed to happen every day for the whole construction period which is clearly a huge overestimation.
SLD-019	Transport and Access	Applicant's Response to Other Parties' Responses to ExAQ1 (TT1.7) – construction worker numbers	The substation, BESS, Area D solar and cable route would all be constructed at the same time. However, [REDACTED] notes that the substation and BESS alone are likely to require 100 workers each (on the basis of the Applicant's other assumptions related to this issue) so the Applicant's argument that a worst case has been used does not appear justifiable.	As above, the peak worker number was assumed to happen every day for the whole construction period, so it is representative of a worst-case assumption.
SLD-020	Transport and Access	Applicant's Response to Other Parties' Responses to ExAQ1 (TT1.16) – construction vehicle movements	The ExA raises the point that a simple proportional allocation of construction vehicle movements is likely to under-estimate the number of movements through Grittleton because it provides access to major compounds. The Applicant has not responded to this point	The Applicant can confirm that worker trips were based on a breakdown provided by a contractor based on the draft layouts and programme. The peak worker trips in a month (622) were distributed to all sites proportionally based on areas. Resulting in 295 workers in A, B and C and 327 workers in D and E. A check was done to see if the daily peaks within any months

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				exceeded these trips. It was found that they were lower with 289 workers in A, B and C and 313 in D and E.
SLD-021	Transport and Access	Applicant's Response to Other Parties' Responses to ExAQ1 (TT1.18) – NMU Impacts	Reference is made (p. 244) to the January 2024 ATC surveys and it is stated that these identified 10 cycle movements per day. However, the ATC surveys that are attached to the TA do not identify cycle movements. This statement therefore appears incorrect and misleading.	Cycle movements were obtained from the survey company for the January surveys. Another NMU survey was undertaken end of July start of August 2026, and the results has been submitted at Deadline 6 in the form of a technical note named Highways Technical Note – Non-Motorised User Surveys [EN010168/EXAM/9.70]. The findings are consistent with previous surveys.
SLD-022	Transport and Access	Applicant's Response to Submissions Received at Deadline 3 (CNL-027) – effects of construction traffic	The Applicant responds to the following position expressed by the CNL: <i>"In conclusion, and notwithstanding the mitigation measures proposed by the Applicant to address the impacts of construction and decommissioning</i>	The Applicant notes this comment and confirms that the Tranquillity Assessment - Effects of Construction Traffic on the Cotswolds National Landscape [REP5-099] was submitted into examination at Deadline 4.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<i>traffic, the Board considers that by routing this significant amount of traffic through</i> <i>the CNL, the Scheme would give rise to a direct, major/moderate (significant)</i> <i>adverse effect on the tranquillity of the CNL, one of its special qualities. Whilst it</i> <i>is acknowledged that in EIA terms, this impact would be 'temporary' (i.e. not</i> <i>permanent), it would still last for several years and for its duration, the impact would be significant, direct and adverse."</i> It is noted that a Tranquillity Assessment will be produced by the Applicant at Deadline 5 which will respond to this statement in part. SLD will provide a response to the Tranquillity	

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			Assessment as soon as practicable.	
SLD-023	Transport and Access	Applicant's Response to Submissions Received at Deadline 3 (GDPR-001) – Equine concerns	The Applicant states that Alderton Road and the Fosse Way will be widened 'up to 6.0m'. This does not overcome the concern for horse riders since this widening is only at passing places and there are sections where the road is not wide enough to allow safe passing. Drivers are likely to attempt to pass rather than wait until a passing place is reached (or a horse reaches a passing place).	The Applicant makes note of this comment. As noted in TT2.5 of the Applicant's Response to the Examining Authority's Second Written Questions [REP5-097]. Further to submission at Deadline 5, details of the surface treatment for the widening areas is now included in the legend on the drawings and the description of works in Table 7 of the Outline CTMP [REP5-083] and Table 13-20 of the ES Volume 3, Appendix 13-1: Transport Assessment [REP5-061] has been updated at Deadline 5. The widened areas will be laid and finished with asphalt to base course, binder course and surface course to match the adjoining highway. As set out in Table 7 of the Outline CTMP [REP5-083] and Table 13-20 of the ES Volume 3, Appendix 13-1: Transport Assessment [REP5-061]

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				submitted at Deadline 5, the works are proposed to be temporary, as will any impacts of the construction phase of the scheme. The Applicant furthermore reaffirms that all construction workers and delivery drivers, will be briefed to adopt safe driving behaviour around non-motorised highway users. This is set out in the Outline CTMP [REP5-083] and any complaints or concerns can be directed to the Community Liaison Manager as secured through the Outline CEMP [REP5-071] by Requirement 13 of Schedule 2 to the Draft DCO [REP5-012].
SLD-024	Transport and Access	Hullavington Parish Council – Highway safety	The Hullavington Parish Council have emphasized a specific road safety concern at the junction of the Street, Hullavington and Norton Road. As described by the Parish Council, <i>"[the] road currently offers no refuge, footway, or safe passing place for vulnerable road users, creating dangerous conditions even</i>	Please refer to TT2.7 in the Applicant's Response to the Examining Authority's Second Written Questions [REP5-097] .

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<i>under current traffic volumes. The road is derestricted, we have a primary school on that end of the street and we now have an additional estate under construction at that junction with 71 new properties."</i> The Parish Council note that any increase in construction traffic associated with the solar development will materially worsen the conditions for road safety.	
SLD-025	Transport and Access	PRoW	████████ further notes that the development referred to Wiltshire Council planning application 20/10972/OUT) incorporates two public rights of way that cross the site and emerge onto Bradfield Cottages. The construction works will have deterred use of these rights of way recently but when the Scheme is complete not only are the new residents likely to use the rights of way to access Bradfield Cottages (cafe/walks) but the rights of way will	The Applicant is aware of application 20/10972/OUT having reviewed and considered it as part of the cumulative assessment provided within ES Volume 1, Chapter 21 Cumulative and In-Combination Effects [APP-073]. In the event the construction phases overlap, it is acknowledged that there is the potential for air quality, noise and socio-economic cumulative effects. In terms of traffic and transportation, TEMPro growth factor includes planned growth, therefore movements are already accounted for in future baseline – no significant

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			become more attractive for existing residents in the village.	cumulative effects are identified. Use of the PRow post construction is noted. Use and management of the PRow within the Order limits will be subject to the provisions of the Outline Public Right of Way and Permissive Paths Management Plan [REP1-105] .
SLD-026	Transport and Access	Steve Harvey Strava Data – Cyclist use	This document contains extracts from the Strava cycle database which provides evidence of cyclists that use the local highway network. It is interesting to note that the number of riders recorded on Bradfield Cottages in 2026 (967) represents 69% of the number recorded on the Fosse Way in 2026 (1,406). Strava only picks up those who use the app and only records a single journey for each rider. The numbers are therefore significantly below the actual number of riders on each of the routes. However, given the popularity of the Fosse Way for cyclists, the relatively high number recorded on Bradfield Cottages reinforces the concerns about	The Applicant is aware of the conditions for non-motorised users, including cyclists, on this piece of the highway network (past Bradfield Cottages), and has used this understanding in its assessment of impacts in ES Volume 1, Chapter 13: Transport and Access [REP4-014] and Chapter 16: Socio-Economics, Tourism and Recreation [APP-068] . The Applicant acknowledges that the Scheme will increase HGV movements at this location, however, does not consider the quantum of additional HGVs at this location would significantly change the experience of fear and intimidation, or actual safety, to non-motorised users such as cyclists. Please refer to TT2.7 in the

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			cyclists safety on this highly sensitive link.	Applicant's Response to the Examining Authority's Second Written Questions [REP5-097]. In addition, another NMU survey was undertaken at the end of July and start of August in 2026, and the results have been submitted at Deadline 6 in the form of a technical note titled Highways Technical Note – Non-Motorised User Surveys [EN010168/EXAM/9.70]. The findings are similar to previous surveys, which show the road past Bradfield Cottages has approximately 58-69% of the cycle traffic as appears on the Fosse Way southwest of Ladyswood (therefore is consistent with SLD's data from Strava). The survey (taken over the course of a week) shows that an average of 30 cyclists pass through this section during proposed delivery hours (0930-1630) during the weekdays, with 66 passing through on Saturday (0930-1230). The busiest peak hour (1000-1100 Saturday) saw 27 cyclists pass through. The busiest day for cyclists on

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				this section of road was Sunday, which will not see any construction movements. Proposed and existing passing places are available at various locations along the road past Bradfield Cottages to facilitate the passing of HGVs and cyclists when necessary. The road is also already associated with HGVs associated with the Old Railway Yard industrial estate. Where access to the site is taken, this would be managed by a banksman. There is a maximum distance of approximately 170 m between passing places of at least 5.5 m carriageway width. There is therefore no material impact on cyclists at this location.
SLD-027	Other Environmental Matters	Review of assessment guidance	Appendix B to this document is a report prepared by Straten CSL in response to the ExQ2 and includes an independent review of the Pager Power Guidance (V4) relied upon by the Applicant for its assessment.	The Applicant notes this report and has responded to individual matters below.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
SLD-028	Ecology and Biodiversity	ES Volume 1 Chapter 9 Ecology and Biodiversity – CRC hedgerow surveys	2.4.1 Paragraph 9.6.16 has been updated to note that hedgerow surveys were undertaken within the CRC between April and June 2025, wherein hedgerows were appraised against ecological criteria for determining whether they qualified as “important” under the Hedgerow Regulations 1997.	The Applicant notes Stop Lime Down's comment and confirms ES Volume 1, Chapter 9: Ecology and Biodiversity [REP4-010] was updated at paragraph 9.6.16 as stated at Deadline 4.
SLD-029	Ecology and Biodiversity	ES Volume 1 Chapter 9 Ecology and Biodiversity – Hedgerow Importance	2.4.2 [REP1-083] confirms that the overwhelming majority of hedgerows within the boundaries of the PV Sites have been defined by the applicant as species-rich and in good condition. CRC hedgerows showed similar traits and signs of good condition. The Applicant acknowledges the hedgerow network as being of District Importance.	The Applicant notes this comment.
SLD-030	Ecology and Biodiversity	ES Volume 1 Chapter 9 Ecology and Biodiversity – HDD use	Mr. Valori queries that, given the ecological value of the hedgerow and the Applicant's assumption of species presence, why the proposed avoidance areas are such a limited	The Applicant notes this comment. The Avoidance Areas identified for trenchless cable installation methods, such as horizontal directional drilling (HDD), within the Outline CEMP

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			fraction of its length. SLD appreciate that horizontal direct drilling is a significant expense, however the Applicant apparently purports to rely upon the availability of HDD to mitigate some of the harms to hedgerow within its Outline Construction Environmental Management Plan [REP4-050] and the Cable Route Construction Method Statement [REP4-040].	[REP5-071] and Appendix 3-2 Cable Route Construction Method Statement [REP5-045] , have been selected due to the presence of a number of sensitivities. The presence of hedgerows, in combination with other features such as woodland, streams, and infrastructure, have been used to determine Avoidance Areas, and therefore certain impacts to hedgerows in those discrete locations are anticipated to be avoided.
SLD-040	Ecology and Biodiversity	Written Summary of the Applicant's Oral Submissions and Responses at ISH3 and Responses to Action Points –	2.4.3 In relation to expected hedgerow losses, the Applicant has further clarified post hearing the exact reasoning for the choice of specific hedgerows to be included within the avoidance areas over others. Of the six hedgerow avoidance areas, six are due to these being in association with sensitive brooks and their surrounding woodland habitat, and two due to being associated with road/railside woodland strips. In other words, avoidance has been	The Applicant notes this comment and confirms this approach to hedgerow inclusion within Avoidance Areas.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		Hedgerow avoidance areas	driven by the hedgerow's association with sensitive off-site habitats, rather than the intrinsic ecological value of the individual hedgerow (as the majority of the hedges on site have been identified as ecologically important, under Hedgerow Regulation 1997 criteria). For all hedgerows outside of avoidance areas, the scheme has been designed with limiting the extent of removal as much as possible.	
SLD-041	Ecology and Biodiversity	Written Summary of the Applicant's Oral Submissions and Responses at ISH3 and Responses to Action	2.4.4 Mr. Valori further notes that all the listed hedgerows to be avoided correspond to sections where there is already an existing access limitation as well as an ecological factor (e.g. hedges associated with stream sections crossing the order limits, or a major road or railway line). Mr. Valori queries to what extent horizontal drilling would actually be an available option to avoid ecological impacts on	The Applicant notes this comment. As stated in the above comment SLD-040, the primary avoidance method applied to hedgerows within the Scheme has been through minimising the extent of hedgerow loss in each location as far as reasonably practicable. Minimising hedgerow loss within Scheme design will also act to minimise potential impacts to protected / notable species therein. Horizontal directional drilling (HDD) is proposed within key Avoidance Areas, as set out within the

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		Points – Hedgerow avoidance areas	hedgerow as well as species within hedgerow.	Outline CEMP [REP5-071] and Appendix 3-2 Cable Route Construction Method Statement [REP5-045] . Whilst additional use of HDD may be identified where particularly sensitive features are confirmed, the use of trenchless techniques such as HDD must be considered on a proportionate basis, taking account of engineering, environmental and cost considerations. In locations outside of identified Avoidance Areas, a range of impact avoidance measures will be applied in the first instance. In relation to hedgerows, these may include micro-siting of the cable route during detailed design to avoid ecologically valuable hedgerow trees, badger setts and other sensitive ecological features identified at the detailed design and pre-commencement stage. The Applicant considers that these avoidance measures, together with the mitigation provisions set out Outline EPMS [REP5-081] are sufficiently robust to

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				minimise potential impacts to hedgerows and protected / notable species present therein, where hedgerows lie outside of Avoidance Areas.
SLD-042	Ecology and Biodiversity	Written Summary of the Applicant's Oral Submissions and Responses at ISH3 and Responses to Action Points – Skylark mitigation	2.4.5 Within its post-hearing submissions, the Applicant states that that Table 3 of the Outline Operational Environmental Management Plan has been updated to address adaptive skylark mitigation (p. 47).	The Applicant notes this comment and confirms Table 3 of the Outline OEMP [REP4-051] was updated as stated at Deadline 4.
SLD-043	Ecology and Biodiversity	Written Summary of the Applicant's Oral	However, there has been no new information provided in relation to adaptive management. Rather it states at p. 20: " <i>The Outline LEMP [REP3-100] sets out the provision of</i>	The Applicant refers SLD to its response given to CH2.12 in the Applicant's Response to the Examining Authority's Second Written Questions [REP5-097] which

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		Submissions and Responses at ISH3 and Responses to Action Points – Skylark mitigation	<i>areas specifically designed to provide suitable habitat for ground-nesting birds, in particular skylark, and establishes the long-term management requirements for these areas. Section 1.4 of the Outline LEMP [REP3-100] also sets out an ecological monitoring strategy, which includes monitoring of bird populations at the Solar PV Sites, including within the ground-nesting bird mitigation areas, to enable comparison with baseline bird survey data. The findings of this ongoing monitoring will be used to assess the effectiveness of the ground-nesting bird mitigation areas and to identify whether any remedial or adaptive measures, such as changes to the management regime, are required if monitoring demonstrates that ground-nesting birds are not using the mitigation areas to the extent anticipated."</i>	provides detail on the Applicant's approach to adaptive management of mitigation. The Applicant confirms Table 3 of the Outline OEMP [REP4-051] was updated as stated at Deadline 4. Outline prescriptions for ecological monitoring are set out within the Outline Landscape and Ecological Management Plan (LEMP) [REP5-079], with further details to be provided within the detailed LEMP, secured via Requirement 7 in Schedule 2 of the Draft Development Consent Order [REP5-012]. The Applicant remains keen to discuss further details of the monitoring requirements, including monitoring methodologies, frequencies and reporting arrangements with Wiltshire Council and other relevant stakeholders, and any additional measures may be included within the detailed LEMP where appropriate, which is secured through Requirement 7 of Schedule 2 to the Draft

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Development Consent Order [REP5-012].
SLD-044	Ecology and Biodiversity	Written Summary of the Applicant's Oral Submissions and Responses at ISH3 and Responses to Action Points – Skylark mitigation	2.4.6 However, no new information has been provided in relation to how measures might be adapted. The oLEMP [REP3-100] states only that monitoring will be carried out more regularly during the first five years of operation so that remediation measures or changes in management can be applied to developing habitats (p. 36). No time period is mentioned for species specific monitoring. In relation to monitoring of bird populations, "monitoring of the bird populations across the Solar PV Sites, both within the array and potential mitigation areas, will be undertaken and compared to baseline bird survey data collected for the Scheme."	The Applicant notes this comment. Further details of monitoring and adaptive management of skylark mitigation habitats at the Solar PV Sites will be set out in within the detailed LEMP document (to be prepared in consultation with Wiltshire Council) in which a detailed ecological monitoring strategy will be provided. This is secured via Requirement 7 in Schedule 2 of the Draft Development Consent Order [REP5-012] . The Applicant considers the post-consent detailed design stage to be the appropriate point at which these measures are defined, as this will enable the mitigation strategy to be informed by the final approved design and prevailing site conditions at the time of implementation.
SLD-045	Ecology and Biodiversity	Written Summary of the	There is no further detail in respect of how frequent such monitoring will be, or how ecological management	The Applicant notes this comment. The most appropriate methods for adaptation of ecological management

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		Applicant's Oral Submissions and Responses at ISH3 and Responses to Action Points – Skylark mitigation	may be adapted in response to poor recovery by local bird populations (such as by, for example, increasing sight lines for skylark by lowering the height of boundary hedges).	will be informed by the results of monitoring surveys. The framework for this, including the proposed frequency of monitoring visits will be provided within the detailed Landscape and Ecological Management Plan document, secured via Requirement 7 in Schedule 2 of the Draft Development Consent Order [REP5-012] . The Applicant considers the post-consent detailed design stage to be the appropriate point at which these measures are defined, as this will enable the mitigation strategy to be informed by the final scheme design and site conditions.
SLD-046	Ecology and Biodiversity	Written Summary of the Applicant's Oral Submissions and Responses at	2.4.7 SLD notes that there is currently a discrepancy between the skylark territory uplift calculations and assumptions ([REP4-010] para 9.12.36) and the fields listed to be set aside or enhanced within the OLEMP ([REP4-010] para 1.3.140). While this inconsistency is not expected to result in an unexpected impact on skylark, as the oLEMP	The Applicant notes this comment and confirms that the discrepancy between the quantum of ground nesting bird mitigation habitat proposed will be corrected in an updated version of the Outline LEMP [EN010168/APP/7.18] (Revision 4) submitted at Deadline 6.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		ISH3 and Responses to Action Points – Skylark mitigation	reports an increase of 10ha of habitat to be enhanced relative to prior assumptions, the exact number of territories and uplift expected as a result of the present mitigation measures should be updated to better reflect the latest layout, skylark territory targets and for general clarity.	
SLD-047	Ecology and Biodiversity	Written Summary of the Applicant's Oral Submissions and Responses at ISH3 and Responses to Action Points – Skylark mitigation	2.4.8 SLD considers that there should be skylark specific monitoring secured within the OLEMP at more regular intervals.	The Applicant notes this comment. A full ecological monitoring strategy will be provided within the detailed Landscape and Ecological Management Plan, including appropriate timing of skylark monitoring, secured via Requirement 7 in Schedule 2 of the Draft DCO [REP5-012] . The Applicant considers the post-consent detailed design stage to be the appropriate point at which these measures are defined, as this will enable the mitigation strategy to be informed by the final scheme design and site conditions. This plan will include clear success criteria, monitoring requirements, and triggers

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				for the implementation of remedial measures, including specified habitat condition targets.
SLD-048	Ecology and Biodiversity	Written Summary of the Applicant's Oral Submissions and Responses at ISH3 and Responses to Action Points – Skylark mitigation	As accepted by the Applicant within their Chapter 9 of the ES, even after the successful implementation of the proposed mitigation measures, there would remain a residual displacement of approximately 71.5% of the baseline skylark. Given the extent of this significant adverse effect, close monitoring followed shortly by the necessary management interventions, if required, will be key to ensure that even this partial mitigation is successful.	The Applicant notes this comment and agrees that appropriate management and monitoring of proposed ground nesting bird mitigation habitats will be required to successfully deliver the proposed mitigation. Such measures will be secured within the detailed Landscape and Ecological Management Plan via Requirement 7 in Schedule 2 of the Draft DCO [REP5-012]. The Applicant also refers SLD to its response given to EB2.7 in the Applicant's Response to the Examining Authority's Second Written Questions [REP5-097] which provides additional detail on the long-term suitability of the ground-nesting bird mitigation areas.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
SLD-049	Ecology and Biodiversity	Written Summary of the Applicant's Oral Submissions and Responses at ISH3 and Responses to Action Points – Skylark mitigation	2.4.9 Among management factors to consider in the short term during the site's operational phase, it is worth factoring that there will be a time delay between the present condition of fields A11, A12, C10, C24 and C28 and their management targets as diverse wildflower meadows.	The Applicant notes this comment and notes there is an error in Table 7 of the Outline LEMP [REP5-079] . Fields A11, A12, C10 and C24 are proposed to be given to arable set-aside (as shown on ES Volume 3, Figure 3-4-1 to 3-4-5.2 Landscape and Ecology Mitigation Plan [REP5-039 to REP5-042]) and not wildflower meadows. Target habitat in these fields can be achieved immediately following completion of the last harvest of crop in each field. Fields A1, B12, C1 and C6 are however proposed to be given to wildflower meadow. A revised version of the Outline LEMP [EN010168/APP/7.18] (Revision 4) with this error corrected has been submitted at Deadline 6. Whilst it is acknowledged that there will be a delay between habitat creation and establishment of a diverse wildflower meadow grassland that meets the criteria for botanical species richness, suitable habitat structure for ground-nesting birds can be achieved from the

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				construction stage onwards. Vegetation structure and the provision of open sightlines are the principal factors influencing skylark nest-site selection, more so than sward composition. Through implementation of appropriate management to ensure suitable vegetation structure, as set out within the Outline LEMP [REP5-079] , wildflower meadow habitat will provide suitable nesting opportunities for skylark during the interim period, until the target habitat condition is achieved.
SLD-050	Ecology and Biodiversity	Written Summary of the Applicant's Oral Submissions and Responses at ISH3 and Responses to Action	Per in-built estimates within the BNG framework, the general assumption for the amount of time for a field or pasture to develop into a species-rich meadow is estimated between 10- 15 years of consistent management.	The Applicant notes this comment. The Statutory Biodiversity Net Gain (BNG) Metric indicates that the proposed species-rich neutral grassland habitat, established from a baseline of arable or agriculturally improved grassland, would typically require around 10 years to achieve its target habitat condition. However, this timescale primarily reflects the period required for soil nutrient levels to decline sufficiently, enabling a reduction in competitive grass and ruderal species and the

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		Points – Skylark mitigation		establishment of a more diverse assemblage of less competitive grasses and flowering plants. As explained in the response to SLD-049 above, this does not equate to the time required for the habitat to become suitable for nesting skylarks. Suitable nesting conditions are principally determined by vegetation structure and the availability of appropriate nesting and foraging opportunities, which can be achieved through appropriate habitat management well before the target botanical condition is attained.
SLD-051	Ecology and Biodiversity	Written Summary of the Applicant's Oral Submissions and Responses at ISH3 and Responses	While the present habitat will still allow for skylark to continue nesting within the fields as they gradually improve over time, it is expected that an actual increase in skylark territories will not start showing results until several years into the operational phase.	The Applicant notes this comment. The assessment of effects on ground nesting species such as skylark presented in ES Volume 1, Chapter 9: Ecology and Biodiversity [REP4-010] considers the potential effects across the entirety of the operational phase. Skylark populations and breeding occupancy within any given year can fluctuate considerably and is influenced by a range of factors that are beyond

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		to Action Points – Skylark mitigation		the Applicant's control. These include, but are not limited to, weather conditions, overwinter survival rates, and the land-use changes, cropping regimes and agricultural practices adopted within the wider surrounding landscape. Given that the proposed diverse wildflower meadow habitats will be managed to achieve their target condition during the operational phase, the proposed mitigation and consequent assessment of effects are considered to accurately reflect the potential impacts to skylark and ground nesting species across the lifetime of the Scheme.
SLD-052	Ecology and Biodiversity	Written Summary of the Applicant's Oral Submissions and Responses at	2.4.10 A greater degree of skylark displacement should therefore be assumed within the hay-cut meadow fields in the initial years following the development. This is worth noting, as initial estimates and calculations assumed set-aside low	The Applicant notes this comment but disagrees with the statement therein, as detailed in the relevant responses to SLD-049 to SLD-051 above.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		ISH3 and Responses to Action Points – Skylark mitigation	intensity fields to have a greater carrying capacity for skylark specifically.	
SLD-056	Ecology and Biodiversity	Written Summary of the Applicant's Oral Submissions and Responses at ISH3 and Responses to Action Points – Skylark mitigation	By contrast, the latest oLEMP currently shows a ~10ha decrease in the amount of these set-aside fields, with a 20ha increase in the proposed amount of hay-cut meadow grassland to be enhanced for skylark instead.	The Applicant notes this comment and confirms that the discrepancy between the quantum of ground nesting bird mitigation habitat proposed has been corrected in an updated version of the Outline LEMP [EN010168/APP/7.18] (Revision 4) submitted at Deadline 6 as per the response to SLD-049 above.
SLD-057	Ecology and Biodiversity	Written Summary of the Applicant's	2.4.11 With the above in mind, Mr Valori queries whether any additional measures will be implemented shortly following panel installation to	The Applicant notes this comment. No additional measures are proposed, as the ground nesting bird mitigation areas will provide suitable nesting

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		Oral Submissions and Responses at ISH3 and Responses to Action Points – Skylark mitigation	help bridge this 'gap' and delay, as well as how this will be accounted for when monitoring numbers of territories relative to the expected targets in the initial years.	opportunities following completion of construction and the proposed increases in carrying capacity will be delivered over time as the diverse grassland sward establishes. Proposed monitoring of ground nesting bird mitigation areas will have consideration for the anticipated habitat establishment and will ensure management is being undertaken in line with the Outline LEMP [REP5-079] to ensure successful delivery of ground nesting bird mitigation in the long-term.
SLD-058	Ecology and Biodiversity	Written Summary of the Applicant's Oral Submissions and Responses at ISH3 and Responses	Mr. Valori notes a general inconsistency in this approach, with habitat suitability of the ditches generally stated to be relatively low and unsuitable, with standard buffer widths being 8m for ditches not associated with hedgerows and culverting mitigation proceeding on a pre-clearance search basis, but also assuming presence of sensitive fauna due to the lack of species-specific surveys Mr Valori seeks	The Applicant notes this comment; however, it is not clear within Stop Lime Down's submission to which approach this comment refers. The Applicant assumes this comment relates to the approach to white-clawed crayfish survey and mitigation, despite Paragraph 2.4.11 of SLD's Responses to the ExA's second written questions (ExQ2) [REP5-130] initially referring to skylark, and has provided a response accordingly.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		to Action Points – Aquatic Invertebrates	clarification as to what scenarios and processes exactly would trigger a formal aquatic invertebrate re-survey over re-applying the current assumption of presence.	As set out within Method Statement 14 the Outline EPMS [REP5-081] , a pre-commencement inspection of ditches and watercourses will be undertaken by a suitably experienced and licensed ecologist to reassess the suitability of the habitat for white-clawed crayfish. Where suitable habitat is present that may be impacted in discrete locations for new temporary or permanent culverts, a targeted search for presence of white-clawed crayfish and field signs would be undertaken at these locations. Should white-clawed crayfish be identified, works in the area will not commence until the need for additional mitigation requirements, micro-siting of crossing points, and/or licensing has been evaluated and confirmed by the Ecological Clerk of Works.
SLD-059	Ecology and Biodiversity	Written Summary of the Applicant's Oral	2.4.12 In respect of buffers for watercourses, during SoCG discussions on 6	The Applicant notes this comment and confirms this matter was discussed between the parties on 06 August 2026.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		Submissions and Responses at ISH3 and Responses to Action Points – Aquatic Invertebrates	August 2026 the Applicant acknowledged that additional ecological surveys, such as an updated, white-clawed crayfish assessment, may be carried out ahead of works in response to a change in the siting of any features which could affect these watercourses, such as the proposed culverted ditch crossings.	
SLD-060	Ecology and Biodiversity	Written Summary of the Applicant's Oral Submissions and Responses at ISH3 and Responses to Action Points –	Mr Valori queries how these buffers will be implemented and adjusted, if at all, especially in a scenario where crayfish or other sensitive fauna are discovered during pre clearance searches. Will the wider buffer widths be automatically applied to all suitable wet ditches, or will these be widened (and culverts potentially re-sited) only in a scenario where crayfish are directly observed?	The Applicant notes this comment and refers to the response to SLD-058 above. Should white-clawed crayfish be identified during pre-commencement checks in discrete locations where they could be affected by watercourse crossing works, additional mitigation measures may be applied as set out in the response to SLD-058 above, to avoid adverse effects. The proposed buffer widths would not be amended, as a minimum 8 m buffer

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		Aquatic Invertebrates		is considered sufficient to avoid impacts on white-clawed crayfish. This species is typically associated with the watercourse channel and refugia therein and generally remains in close proximity to the water's edge. Consequently, the proposed buffer is considered adequate to protect the species from construction-related impacts.
SLD-061	Ecology and Biodiversity	SoCG with Natural England – Protected species surveys and licensing	2.4.13 Mr. Valori notes that Natural England has confirmed that the species licencing matters identified relating to dormice have been agreed, but has requested further more detailed surveys six months prior to the submission of a formal application to ensure the data remains current.	The Applicant notes this comment and confirms that Item 3.3.15 of the Statement of Common Ground with Natural England [REP4-063] relating to dormice is marked as 'Agreed' between the parties. The Applicant maintains that the assumption of dormouse presence in suitable habitat within the Order Limits and the avoidance and mitigation measures proposed within the Outline EPMS [REP5-081] are sufficiently precautionary to avoid potential adverse impacts to the species during construction. The Applicant does not

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				consider that completion of detailed surveys for dormice, in addition to the pre-clearance checks already prescribed within the Outline EPMS [REP5-081], would materially affect the conclusion of no significant adverse effects on the species, as set out within ES Volume 1, Chapter 9: Ecology and Biodiversity [REP4-010], or materially alter the proposed mitigation measures. The Applicant notes that Natural England are in agreement with this approach as set out under EB2.14 in their Responses to the ExA's Second Written Questions (ExQ2) [REP5-140].
SLD-062	Ecology and Biodiversity	SoCG with Natural England – Protected species surveys and licensing	Mr. Valori queries why up to date information is not sought for dormice or white-clawed crayfish as well, which may similarly require the securing of a licence as a result of works.	The Applicant notes this comment and refers to the response to SLD-061 above in relation to dormice. A similar approach has been taken for white-clawed crayfish whereby species presence has been assumed in areas of suitable habitat within the Order Limits. Suitably precautionary and

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				proportionate avoidance and mitigation measures, including pre-clearance checks for white-clawed crayfish, are set out within the Outline EMPS [REP5-081]. As for dormice above, the Applicant does not consider that completion of detailed surveys for white-clawed crayfish would materially alter the proposed mitigation measures. For both species, suitable provisions are included within the Outline EPMS [REP5-081] to facilitate applications for any necessary protected species licences during the construction phase, should these be required
SLD-063	Cultural Heritage	SoCG with Historic England - Designated heritage assets	2.5.1. SLD's heritage experts, Marrons, note that agreement has been reached with Historic England in respect of the Applicant's approach to safeguarding designated heritage assets.	The Applicant notes this comment
SLD-064	Cultural Heritage	SoCG with Historic England –	However, with regards to Bradfield Manor Farmhouse, Historic England have also acknowledged that in	The Applicant considers that while there may be some limited and filtered views during winter months when

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		Bradfield Manor Farmhouse	winter the screening would not be so effective so there would be less effective mitigation for long-range views.	vegetation is at its lowest, the proposed landscape mitigation is sufficient. In their response letter regarding the visualisations for Bradfield Manor in Written representations, and summaries for any exceeding 1500 words [REP1-152], Historic England stated <i>"The photo [used for the visualisations] was taken on the 22nd May 2025, and therefore this includes maximum vegetation screening. We advise that winter views may reveal more visibility of the development."</i> Historic England also stated <i>"We advise that there is potential for the harm to be minimised and mitigated through some additional planting along southern boundaries of the application site, which may potentially provide screening of the visible areas of D2 and D3, D5. It seems unlikely that D20 on rising topography would be able to be screened, but as this site is further from the Manor, the harm would be minimised."</i> The Applicant has followed this advice through set- back of panels

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				and reinforcement of hedgerows in the south of fields D2, D3 and D5 (see ES Volume 2 Figure 3-4-1 to 3-4-2 Landscape and Ecology Mitigation Plan [REP5-039]). The Applicant highlights that both Historic England and Wiltshire Council are in agreement to the assessment of harm and proposed mitigation for Bradfield Manor (see 8.5 Statement of Common Ground with Historic England [REP4-065], and Historic England and Wiltshire Council Responses to the ExA's second written questions (ExQ2) [REP5-125] and [REP5-112]).
SLD-065	Cultural Heritage	SoCG with Historic England – Level of harm	Clarity is sought in respect of whether Historic England also agrees with the level of harm found by the Applicant in their assessment (i.e. at the lower end of the scale of less than substantial harm). Marrons note that the Examiners Questions have raised this query of Historic England and Wiltshire Council at	Historic England agrees with the Applicant Assessment. Please see Historic England's response in Responses to the ExA's Second Written Questions (ExQ2) [REP5-097] : <i>"The NPPF does not define a range of harm within the broader definition of 'less than substantial harm', although we agree that the harm</i>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			CH2.10. SLD will comment on the response provided at Deadline 6.	<i>caused by the proposed development is likely to be at the lower end."</i>
SLD-066	Hydrology, Flood Risk and Drainage	ES Chapter 11 Hydrology, Flood Risk and Drainage Rev 4 – Panel design in flood zones	2.6.1. The updates provided (para 11.9.2) clarifies the position on panel size in flood zone areas. The Applicant has committed to maximum height above ground level of 4.5m for tracking panels and 3.5 m for fixed panels, as well as 0.6 m freeboard of the lowest edge of the panel above the design flood level.	The Applicant notes SLD's acknowledgement of the revised position. As confirmed in ES Volume 1 Chapter 11 Hydrology, Flood Risk and Drainage [REP4-012], the Flood Risk Assessment and Drainage Strategy suite [REP5-047 to REP5-060] and the Design Principles and Parameters [REP4-043], where Solar PV Panels are located within the design flood extent, the lowest leading edge of the panel will be positioned no less than 0.6 m above the design flood level, including the applicable climate change allowance. The maximum panel height parameters of 4.5 m for tracking panels and 3.5 m for fixed panels remain unchanged. The Environment Agency has confirmed its agreement with this freeboard approach.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
SLD-067	Hydrology, Flood Risk and Drainage	ES Chapter 11 Hydrology, Flood Risk and Drainage Rev 4 – Panel adjustments and micro-siting	This will be achieved by “adjustment to panel tilt, tracker operating range or panel micro-siting”. In other words, the tracking panels will not tilt so much, and the slope of the 3.5 m fixed panels will have to be less in these areas.	The Applicant does not agree with SLD's interpretation that the commitment necessarily means that tracking panels will operate at a reduced tilt or that fixed panels will require a reduced slope. Adjustment of panel tilt, tracker operating range and local micro-siting are available detailed design measures which may be used, individually or in combination, to ensure compliance with the committed 0.6 m freeboard while remaining within the maximum design parameters. The particular solution will depend upon the final technology, layout and modelled flood level at the relevant location.
SLD-068	Hydrology, Flood Risk and Drainage	ES Chapter 11 Hydrology, Flood Risk and Drainage Rev 4 – Definition of micro-siting	In discussions with Professor Skeffington, Arthian consultants have clarified that “micro-siting” means small adjustments in the position of the panels rather than building small hills to take them above the water level.	The Applicant confirms that, in this context, micro-siting means local adjustment of the position of Solar PV Panels within the assessed developable area. It does not mean raising ground levels or constructing localised mounds within the floodplain.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				The required flood resilience will be achieved through the siting and design of the infrastructure rather than land raising within the design flood extent.
SLD-069	Hydrology, Flood Risk and Drainage	FRA and ODS – Site-specific drainage strategies	2.6.2 At para 2.4.9, the Applicant notes that site-specific outline drainage strategies have been produced for each Solar PV Site where positively drained hardstanding or formal drainage is proposed.	The Applicant notes SLD's acknowledgement. Site-specific Outline Drainage Strategies are now provided for each Solar PV Site where positively drained hardstanding or formal drainage is proposed within the Flood Risk Assessment and Drainage Strategy suite [REP5-047 to REP5-060] .
SLD-070	Hydrology, Flood Risk and Drainage	FRA and ODS - Hardstanding runoff assessments	The Applicant has provided site specific FRAs which include an "outline" assessment of runoff from hardstanding areas– substations, the BESS, conversion units, and some access tracks. The runoff assessments are quantitative. This is a significant change, discussed under each site FRA.	The Applicant notes SLD's acknowledgement of the quantitative assessments now provided for the relevant positively drained hardstanding areas. The revisions provide further quantitative demonstration that a workable drainage solution, including the necessary flow control and attenuation, can be accommodated within the Scheme parameters. They do not represent a change to the

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				underlying drainage principle, which has consistently distinguished between formal impermeable infrastructure requiring positive drainage and the predominantly permeable Solar PV Panelled Areas. The purpose and conservative basis of the outline calculations are addressed further in the Applicant's response to FHW2.2a.
SLD-071	Hydrology, Flood Risk and Drainage	FRA and ODS - Watercourse buffer distances	2.6.3. Professor Skeffington notes that enhanced buffer distances around watercourses have been mentioned at para 3.2.1. An 8m buffer distance is retained for lower sensitivity ditches and watercourses where no higher "sensitivity criteria" are triggered.	The Applicant notes this comment. A minimum 8 m development-free buffer is retained for ditches and watercourses where no greater site-specific sensitivity applies, with wider buffers provided where required by ecological, species, designated-site or other relevant constraints. The Environment Agency confirmed in its Deadline 5 response that, following discussion with the Applicant and review of Appendix 9-8 Schedule of Protective Ecological Buffers [APP-205], it agrees with the Applicant's

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				proposal to maintain a minimum 8 m buffer from ditches.
SLD-072	Hydrology, Flood Risk and Drainage	FRA and ODS - Enhanced ecological and biosecurity buffers	Larger buffers are applied "where required by the ecological buffer criteria, protected or notable species interest, designated site proximity, biosecurity requirements or construction-phase pollution prevention controls." These buffers are 10m for relevant ecological criteria and 15m for staff, plant and vehicle washdown where required by the oEPMS.	The Applicant notes SLD's acknowledgement of the tiered buffer approach. The minimum 8 m watercourse buffer is supplemented by wider buffers where required by the applicable ecological or environmental control, including the criteria established within Appendix 9-8 Schedule of Protective Ecological Buffers [APP-205] and the Outline EPMS [REP5-081]. The 15 m separation referred to by SLD relates to particular construction and biosecurity activities where required and should not be interpreted as a uniform development buffer applying to every watercourse.
SLD-073	Hydrology, Flood Risk and Drainage	FRA and ODS - Implementation of buffers	SLD seeks clarification as to how these buffers will be implemented having regard to the Applicant's approach of assuming presence	The Applicant does not consider that the precautionary approach to ecological survey creates uncertainty as to how the buffers will be implemented.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			without conducting site-specific surveys.	The minimum 8 m watercourse buffer applies irrespective of whether a protected or notable species is subsequently recorded. Where a greater buffer is triggered by a known, assumed or subsequently confirmed ecological sensitivity, the greater distance will apply in accordance with Appendix 9-8 Schedule of Protective Ecological Buffers [APP-205] and Outline EPMS [REP5-081]. The precautionary assumption of presence therefore provides protection in the absence of further survey information rather than preventing the applicable buffer from being identified or secured. The Environment Agency has reviewed this approach and confirmed its agreement with the minimum 8 m watercourse buffer, alongside the proposed pre-commencement survey arrangements.
SLD-074	Hydrology, Flood Risk and Drainage	FRA and ODS - Lime Down A	2.6.4. The site-specific risk assessments have been updated to	The Applicant notes SLD's acknowledgement. Section 3 of ES Volume 3 Appendix 11-2: Flood Risk

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		drainage strategy	include an outline drainage strategy in section 3.	Assessment and Drainage Strategy Lime Down A [REP5-047] provides the site-specific outline drainage strategy and demonstrates that a feasible drainage solution can be accommodated within the assessed design envelope.
SLD-075	Hydrology, Flood Risk and Drainage	FRA and ODS - Solar panel runoff	2.6.5. Professor Skeffington notes that the Applicant maintains their position that the solar panel areas will not have an increase in runoff and do not need any additional drainage, given mitigation measures such as ensuring grass growth under the panels (paras 3.2.1-3.2.4).	The Applicant has substantively addressed the hydrological effects of Solar PV Panels in its response to FHW2.9 and does not repeat that technical response here. The Applicant recognises that Solar PV Panels redistribute rainfall locally, including potential concentration at panel edges and drip lines. However, local redistribution is not equivalent to an increase in catchment runoff. Whether redistributed rainfall becomes connected surface water runoff depends upon the receiving ground condition, including vegetation, soil structure, compaction, slope, microtopography and hydraulic connectivity.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Those mechanisms are addressed collectively through ES Volume 3 Appendix 11-1 to 11-8: Flood Risk Assessment and Drainage Strategy suite [REP4-021 and REP5-047 REP5-060], Outline CEMP [REP5-071], Outline SRMP [REP5-077], Outline LEMP [REP5-079], Outline EPMS [REP5-081] and Outline OEMP [REP5-073].
SLD-076	Hydrology, Flood Risk and Drainage	FRA and ODS - Solar panel runoff modelling	SLD maintains its position that there would be an increase in runoff as a consequence of panel runoff and drip lines. Modelling shows that this would occur at moderate rainfall rates for 4 of the 5 soil types (Appendix D).	The Applicant notes that SLD maintains its position. The Applicant has substantively addressed panel runoff, drip-line concentration and the circumstances in which those processes may become relevant to off-site flood risk in its response to FHW2.9. The Applicant does not dispute that localised concentrations of rainfall can occur beneath panel edges. However, modelling a local increase in rainfall input at a drip line does not in itself demonstrate an increase in runoff from a Solar PV Site or an increase in flood

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				risk to a downstream receptor. That requires a connected pathway to be established between the locally redistributed rainfall and a watercourse, mapped flow route or receptor. The final panel layout will therefore be considered against topography, soils, mapped flow routes, drainage features, watercourses and sensitive receptors, with the secured soil, vegetation, erosion and runoff controls applying throughout construction and operation. The Applicant does not consider that SLD's Appendix D alters the conclusions of the Scheme assessment.
SLD-077	Hydrology, Flood Risk and Drainage	FRA and ODS - Reliability of embedded mitigation	The embedded mitigation proposed is not sufficient or reliable as it relies upon vegetated ground cover being established and maintained and soil compaction being avoided or remediated.	The Applicant does not agree that the embedded mitigation relies upon uncontrolled assumptions. Vegetation condition and soil compaction are recognised as important controls on runoff and are therefore subject to secured management, inspection and corrective action through the Outline SRMP

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				[REP5-077], Outline CEMP [REP5-071], Outline OEMP [REP5-073] and associated landscape and ecological management measures. The monitoring and intervention arrangements, including identification of persistent bare ground, rutting, ponding, erosion, rilling, channelisation and deterioration in vegetation condition, are addressed in the Applicant's responses to FHW2.9, DCO2.1y and DCO2.1ae above and are not repeated here. The relationship between these measures and their securing mechanisms is consolidated within the Mitigation Route Map [REP5-102].
SLD-078	Hydrology, Flood Risk and Drainage	FRA and ODS - Grass cover beneath panels	SLD has serious doubts in respect of the ability to maintain a sufficient grass cover below the panels given the loss of light and water which the panels will cause.	The Applicant does not rely upon an assumption that uniformly dense grass cover will be maintained immediately beneath every part of every Solar PV Panel. The relevant hydrological objective is to maintain a stable, permeable and sufficiently vegetated ground surface

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				so that persistent bare ground, erosion or hydraulically connected preferential flow routes do not develop. The potential influence of panel shading and rainfall redistribution on vegetation is recognised within the management approach. Operational inspections will identify sparse or bare ground, vegetation decline, drip-line erosion, rilling or channelisation and require proportionate remedial action where necessary. This matter is substantively addressed in the Applicant's responses to FHW2.9 and DCO2.1ae.
SLD-079	Hydrology, Flood Risk and Drainage	FRA and ODS - Soil compaction	Likewise, as identified in SLD's Soil Report (Written Representation, Appendix K1 [REP1 184]), the panels are located in an area where soil compaction is a serious issue.	The Applicant agrees that soil compaction is an important potential runoff mechanism and this is expressly recognised in the Scheme assessment. It is not an unmitigated consequence of the Solar PV Panels themselves. The Outline SRMP [REP5-077] establishes the measures for avoiding, identifying and remediating soil compaction, including controls on

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				trafficking and soil handling, inspection of ground condition and remediation where compaction is identified. Operational monitoring also provides for investigation where indicators such as rutting, persistent ponding, erosion or vegetation deterioration suggest that soil structure may have been adversely affected. The matter is addressed comprehensively in the Applicant's responses to FHW2.9 and DCO2.1ae and is not repeated further here.
SLD-080	Hydrology, Flood Risk and Drainage	FRA and ODS - Hardstanding runoff in Area A	2.6.6. The Applicant accepts that there is a potential to increase runoff as a consequence of hardstanding (at para 3.3.3). Professor Skeffington agrees. The hardstanding in Area A is the substation, substation access track, and 9 conversion units, a total of 7154 m ² .	The Applicant notes that SLD agrees that formal hardstanding has the potential to alter runoff. For this reason, ES Volume 3 Appendix 11-2 Flood Risk Assessment and Drainage Strategy Lime Down A [REP5-047] treats positively drained hardstanding separately from the Solar PV Panelled Areas and provides quantitative runoff, flow-control and attenuation calculations for the relevant

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				infrastructure. The assessment demonstrates that the resulting runoff can be managed through a feasible SuDS arrangement without increasing flood risk elsewhere.
SLD-081	Hydrology, Flood Risk and Drainage	FRA and ODS - Infiltration and soil drainage	2.6.7 The FRA then assesses the scheme against the "drainage hierarchy" which gives the order of priority for disposing of excess water. The Applicant concludes that infiltration to the ground is not feasible, having regard to soilscape mapping of the majority of the site which shows the area as having "lime-rich loamy and clayey soils with impeded drainage."	The Applicant notes this comment. The drainage hierarchy has been considered within ES Volume 3 Appendix 11-2 Flood Risk Assessment and Drainage Strategy Lime Down A [REP5-047] The strategy does not rely upon infiltration as the primary means of disposing of runoff from the principal positively drained hardstanding where the available soil information indicates that this would not provide a sufficiently robust basis for the outline strategy. Controlled discharge to the existing surface water drainage network or receiving watercourse is therefore assessed, with attenuation provided before discharge. The precise SuDS components will be confirmed at detailed design, informed

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				by the final layout and site-specific ground conditions.
SLD-082	Hydrology, Flood Risk and Drainage	FRA and ODS – Drainage beneath panels	However, for the same reason, drainage would be impeded beneath the panels, leading to the excess runoff described in Appendix D.	The Applicant does not agree that the conclusion regarding infiltration drainage for positively drained hardstanding leads to the conclusion advanced by SLD for the Solar PV Panelled Areas. The existing permeability and drainage characteristics of the soils form part of both the pre-development and post-development conditions. Solar PV Panels do not convert those soils into a connected impermeable drainage catchment. The relevant potential change is the local redistribution of rainfall, and whether that redistribution becomes hydraulically connected to a watercourse or receptor. That issue is addressed in the Applicant's response to FHW2.9 and through the secured soil, vegetation, erosion and runoff controls. SLD's comparison therefore conflates two different drainage mechanisms. The

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Applicant does not consider that SLD's Appendix D alters the conclusions of the Scheme assessment.
SLD-083	Hydrology, Flood Risk and Drainage	FRA and ODS – Surface-water discharge	2.6.8. The Applicant concludes that discharge to an above-ground surface water body is the only option, and for Site A this is a land drain feeding into Norton Brook. Wiltshire policy requires them to demonstrate a 30% betterment on greenfield rates, requiring them to install some water retention features. The Applicant's preferred options are swales, detention basins and ponds for the substation and roads, and infiltration trenches for the conversion units. They calculate the storage volume required as 600 m ³ for the substation and 123 m ³ for the access road. A swale of 27 x 27 m and 1 m deep would be required for this volume. SLD would welcome clarification in respect of where these might be located.	The Applicant does not agree that the conclusion regarding infiltration drainage for positively drained hardstanding leads to the conclusion advanced by SLD for the Solar PV Panelled Areas. The existing permeability and drainage characteristics of the soils form part of both the pre-development and post-development conditions. Solar PV Panels do not convert those soils into a connected impermeable drainage catchment. The relevant potential change is the local redistribution of rainfall, and whether that redistribution becomes hydraulically connected to a watercourse or receptor. That issue is addressed in the Applicant's response to FHW2.9 and through the secured soil, vegetation, erosion and runoff controls. SLD's

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				comparison therefore conflates two different drainage mechanisms.
SLD-084	Hydrology, Flood Risk and Drainage	FRA and ODS – Firewater retention	2.6.9. A firewater retention facility is detailed for the substation. Professor Skeffington notes the comment at para 4.2.3 which states, <i>“the risk of flooding from all sources has been assessed and the flood risk is considered to be Negligible to Low and, therefore, does not require site-specific mitigation measures.”</i> This appears an odd statement, given the site-specific mitigation measures detailed within the drainage strategy. There appears to be no basis for the Applicant's assessment of <i>“negligible to low”</i> flood risk.	The statement that flood risk is Negligible to Low relates to the assessed risk of flooding to Lime Down A from the existing flood sources considered in the FRA. It does not mean that no drainage measures are required for new positively drained hardstanding. Lime Down A is located within Flood Zone 1, and the site-specific FRA considers the relevant fluvial, surface water and other flood mechanisms. The Outline Drainage Strategy separately assesses the effect of introducing formal hardstanding and provides attenuation, restricted discharge and water-quality controls to prevent the Scheme increasing flood risk elsewhere. There is therefore no inconsistency between the baseline flood-risk classification and the provision of a

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				site-specific drainage strategy for the proposed infrastructure.
SLD-085	Hydrology, Flood Risk and Drainage	FRA and ODS – Concrete foundations	2.6.10. Paragraph 4.2.4 further states <i>“The solar panels and other electrical infrastructure, including inverters, transformers, cabling and substations, which is to be sat on a concrete foundation/pad that will be mounted on frames and raised above ground level allowing flood water to flow freely underneath. Therefore, there will be no loss of floodplain volume as a result of the Scheme”</i>. There is no suggestion in Chapter 11 of the Applicant's ES (e.g. at [REP4-012] para 11.9.2 or elsewhere) that any equipment will be raised on a concrete pad which will be mounted on frames and raised above ground level to allow water to flow underneath. The Applicant should clarify the meaning of this sentence	The Applicant acknowledges that the sentence identified by SLD is imprecisely expressed. The intended distinction is that Solar PV Panels are mounted on raised support structures, while certain items of electrical infrastructure may be supported on concrete foundations or pads. The sentence should not be interpreted as stating that concrete foundations themselves will be mounted on raised frames. The relevant flood-risk principle remains that flood-sensitive infrastructure will be located outside areas of material flood risk where practicable and that infrastructure within the design flood extent will be appropriately resilient, while avoiding material obstruction of flood flows or loss of floodplain storage. The detailed approach is set out in ES Volume 1 Chapter 11: Hydrology, Flood Risk

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				and Drainage [REP4-012] and the relevant site-specific FRAs and Drainage Strategies in the Flood Risk Assessment and Drainage Strategy suite [REP5-047 to REP5-060] .
SLD-086	Hydrology, Flood Risk and Drainage	FRA and ODS – Surface water storage requirements and locations	<u>ES Appendix 11-6: Flood Risk Assessment and Outline Drainage Strategy– Lime Down D Rev 4 [REP4-032]</u> 2.6.11. Area D contains the BESS and 400 kV substation, and is the only area which previously had a quantitative assessment of flood risk for the BESS and a plan for alleviating it. This has now been extended to the whole of Area D. The conversion units will use infiltration trenches as on the other sites. The BESS will have a system for holding back water, restricting the flow to a maximum of 7.2 l s⁻¹, which will be discharged directly into the Gauze Brook (Table 4). This will require a retention volume of 4507 m³. The 400 kV substation, which is	The Applicant does not agree that the absence of fixed attenuation locations or dimensions represents a deficiency in ES Volume 3 Appendix 11-6 Flood Risk and Drainage Strategy Lime Down D [REP5-055]. The purpose of the outline drainage assessment is to demonstrate that a workable drainage solution can be accommodated within the Scheme parameters, not to prejudge the detailed drainage design before the final BESS and substation technology, equipment layout, finished levels and contributing catchments are known. Importantly, the attenuation volumes identified by SLD have been derived using deliberately conservative assumptions. The assessment treats the currently identified BESS and

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			in the same location, will have a similar but larger system, with a maximum discharge of 8.0 l s⁻¹, which will also be discharged directly into the Gauze Brook (Table 5). This will require a retention volume of 5112 m³. The nature and location of this retention storage is not specified either in the FRA or the Construction Environment Management Plan.	substation areas, based on the relevant indicative areas or maximum design parameters, as contributing hardstanding requiring controlled drainage. For Lime Down D, this includes an assessed BESS area of 37,021 m² and a 400 kV Substation area of 41,968 m². The assessment therefore assumes, for the purposes of demonstrating feasibility, that runoff from these full assessed areas requires formal management. In practice, the final equipment arrangement is unlikely to result in the entirety of each option area comprising positively drained impermeable hardstanding. The final arrangement will include equipment, buildings, gravelled and permeable surfaces, access areas and other infrastructure, with only those areas which actually require positive drainage contributing to the formal attenuation system. The final contributing impermeable area, and consequently the attenuation volume

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				required, is therefore likely to be lower once the detailed layout is known. The indicative storage volumes should also be considered in the context of the overall scale of the BESS and substation areas and the flexibility available within and around those areas to incorporate drainage features. The volumes are not considered onerous in the context of the development area available and do not indicate that a disproportionately large drainage feature would be required. Nor does the Outline Drainage Strategy assume that attenuation would be provided within a single tank or other hard-engineered feature. The Causeway Flow storage element is a nominal modelling unit used to calculate the indicative volume required. It is not a proposed drainage structure. The preferred approach is to use SuDS, which may include detention basins, ponds, swales, lined permeable surfacing, filter drains and

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				other appropriate features, either individually or in combination. These features can be distributed within and around the positively drained infrastructure and along the drainage conveyance route towards the controlled outfall. There is therefore considerable flexibility to integrate attenuation into the final drainage system rather than concentrating the entire calculated volume within a single structure. ES Volume 3 Appendix 11-6: Flood Risk and Drainage Strategy Lime Down D [REP5-055] expressly identifies a range of suitable SuDS components. Fixing the precise location, footprint and geometry of those features at this stage would not improve the assessment of flood risk. It would instead risk constraining the detailed drainage designer to an arrangement developed before the final technology, contributing catchments, levels and infrastructure layout are known. It could

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				also prevent the designer from developing a more efficient, integrated and multifunctional SuDS solution once those parameters are confirmed. The relevant environmental outcome is secured through the drainage principles, namely that runoff from the positively drained areas will be appropriately attenuated, discharge will be restricted in accordance with the committed betterment requirement, sufficient storage will be provided for the 1% AEP event including the applicable climate change allowance, and the Scheme will not increase flood risk elsewhere. The Applicant therefore considers that the outline assessment adopts an appropriately conservative basis and demonstrates substantial flexibility to accommodate the required attenuation. The final SuDS configuration, contributing areas and attenuation volumes will be recalculated and optimised through detailed drainage

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				design once the final Scheme parameters are known. This is the appropriate stage at which to determine the precise form and location of the drainage infrastructure. The basis and conservative nature of the outline assessment are also addressed in FHW2.2a and FHW2.2c.
SLD-087	Hydrology, Flood Risk and Drainage	FRA and ODS – Surface water storage requirements and locations	The volumes concerned would require (for instance) two tanks of around 70 m x 70 m x 1 m depth, which would occupy a not inconsiderable area. The document claims that it has shown that the requisite volumes can be accommodated on site, but there is no assessment of where or how such structures could be fitted in. The access road for the BESS/400 kV substation would require additional water storage of 1238 m ³ , though it is less clear where this would be, and discharge at a maximum of 2.0 l s ⁻¹ (Table 2). Area D also contains a 132 kV substation, which would require storage of 971	The Applicant does not agree with SLD's characterisation that the indicative attenuation requirements would necessitate two tanks of approximately 70 m by 70 m by 1 m. No such structures are proposed or assumed within ES Volume 3 Appendix 11-6: Flood Risk and Drainage Strategy Lime Down D [REP5-055]. That interpretation treats the indicative storage volume as both a fixed detailed-design requirement and a single hard-engineered storage feature. Neither assumption reflects the drainage strategy.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			m3 and discharge into a different part of the Gauze Brook at 3.7 l s-1 (Table 2).	As explained in SLD-086, the calculations have deliberately adopted conservative assumptions regarding the positively drained areas in order to demonstrate that a workable drainage solution remains feasible. Once the final BESS, substation and access arrangements are established, the actual contributing impermeable areas will be defined and the attenuation calculations refined accordingly. It is likely that the final storage requirement will be lower than the indicative outline volumes where parts of the assessed option areas remain permeable or do not drain to the formal drainage system. There is also no requirement for the attenuation associated with each infrastructure area to be provided as a single discrete structure. Storage can be distributed within and around the positively drained features and along the drainage conveyance route to the relevant outfall. A combination of SuDS components can collectively provide

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				the required storage and treatment while being integrated with the final infrastructure layout. The same principle applies to the indicative attenuation associated with the access infrastructure and 132 kV Substation. The calculated volumes demonstrate the order of storage that can be accommodated under the conservative outline assumptions. They do not prescribe separate tanks, ponds or other fixed features of those volumes. The Applicant considers that prescribing the precise location and geometry of attenuation at this stage would unnecessarily constrain detailed design. The final drainage designer should retain the flexibility to respond to the final contributing catchments, levels, infrastructure arrangement and available opportunities for multifunctional SuDS, while remaining within the drainage principles and

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				performance requirements already secured. The outline assessment therefore fulfils its intended purpose by demonstrating that a feasible drainage strategy can be delivered within the Scheme parameters. Final attenuation volumes, SuDS components and their locations will appropriately be confirmed through detailed drainage design.
SLD-089	Hydrology, Flood Risk and Drainage	Hydraulic Modelling Reports – Model scope and methodology	<u>9.32 Hydraulic Modelling Report [REP3-131]</u> and <u>9.53 Lime Down E2- Hydraulic Modelling Report [REP4-089]</u> 2.6.12. [REP3-131] was submitted at Deadline 3 and covers the Gauze Brook from the crossing of Hill Hayes Lane in Hullavington to just upstream of Corston, including the smaller northern branch which starts near Bradfield Wood. This affects Area D of the Scheme. [REP4-089] covers the Rodbourne Brook from Lower Stanton St Quinton to Rodbourne Bottom, affecting Area E2 of the Scheme.	The Applicant notes that SLD's description relates principally to earlier iterations of the hydraulic modelling. An updated Lime Down D - Hydraulic Modelling Report [REP5-095] has been submitted at Deadline 5 in response to the Environment Agency's review. The revised report incorporates the additional supporting FEH hydrological information requested by the Environment Agency and the extended detailed channel survey of Gauze Brook.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			These are the two areas of the Scheme where panel infrastructure is proposed to be built in EA Flood Zones 2 and 3. In the absence of an EA hydraulic model for these areas, models have been developed by Arthian on behalf of the Applicant. The modelling uses a 1D/2D commercial flood model (TUFLOW). A slightly earlier version is used for Area D than Area E2– this is unlikely to be significant. Topographic data is from an EA LIDAR survey in 2020 supplemented in the case of E2 by a detailed channel survey from a specialist company conducted in March 2026. Area D was also surveyed at the same time, but there is no mention of use of these data in the model. It is understood that the modelling is being revised after comments from the EA.	The Lime Down E2 - Hydraulic Modelling Report [REP4-089] has also been reviewed by the EA with comments provided directly to the Applicant via email on 12 August 2026; it is anticipated these comments will be uploaded by the EA as part of their Deadline 6 submissions. The comments provided via email confirm that the modelling approach, including the 1D/2D ESTRY-TUFLOW representation, hydrological methodology, model resolution and range of design events, is reasonable and appropriate for the assessment.
SLD-099	Hydrology, Flood Risk and Drainage	Hydraulic Modelling Reports – Consistency	2.6.13. The results output by the models differ between sites. The main text at both sites is concerned purely with flood depth. The	The Applicant notes this comment. The two hydraulic models have been developed for separate watercourses with different catchment characteristics,

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		of model outputs	Rodbourn Brook model also includes an appendix (Annex B) which reproduces a checklist from the Flood Estimation Handbook and reports peak flow rates for flood events of differing return periods. It is not clear why the sites have been treated differently, because this would be valuable information in both cases. The ExA also asked for a consistent approach here.	available data and assessment requirements and there is no requirement for the supporting reports to have an identical structure. Nevertheless, the Lime Down D - Hydraulic Modelling Report [REP5-095] has been updated at Deadline 5 and now contains the additional FEH hydrological information requested during the Environment Agency's review, thereby providing greater consistency in the supporting evidence. Both assessments provide the design-event hydrology and hydraulic outputs necessary to establish flood extents and depths and to inform the assessment of floodplain interaction and Scheme resilience.
SLD-100	Hydrology, Flood Risk and Drainage	Hydraulic Modelling Reports – Validation against flow gauge data	2.6.14. Models should always be checked against data where it is available, and this is a standard part of the Flood Estimation Handbook procedures. Flow gauge data are available for both the Gauze Brook and the Rodbourne Brook, but the	The Applicant agrees that observed flow data can provide useful supporting information where a gauging station and its records are suitable for the purpose. However, the existence of a downstream gauging record does not mean that it provides a direct

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			Applicant has not assessed their model outputs against the measured data. This can be conveniently accessed from the Government's Hydrology Data Explorer website at https://environment.data.gov.uk/hydrology/explore .	calibration or validation dataset for a model without consideration of the station location, contributing catchment, rating quality and suitability of the high-flow record. In relation to Lime Down E2, the Environment Agency has reviewed the hydrological assessment and treats the relevant catchment as ungauged for flood-estimation purposes. It has confirmed that the FEH Statistical method adopted by the Applicant is reasonable. For Lime Down D, the supporting FEH hydrological calculation record has been provided within the updated Lime Down D - Hydraulic Modelling Report [REP5-095] submitted at Deadline 5, in response to the Environment Agency's review. The Applicant therefore does not agree that the absence of the direct comparison proposed by SLD demonstrates a deficiency in the design hydrology.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
SLD-101	Hydrology, Flood Risk and Drainage	Hydraulic Modelling Reports – Underestimation of peak flows	For the Rodbourne Brook, the gauging station is at Startley, ID 530120 at Grid Reference ST9401283156. In the Hydraulic Modelling Report for the Rodbourne Brook ([REP4-089] Annex B para 2.4), the Applicant appears to have confused this station with the nearby station on the Gauze Brook (see below). The station does not appear in the National River Flow Archive and there is a note to say that the data are affected by weed growth. Nevertheless, there are 30 years of data with a few gaps. The Applicant's analysis ([REP4-089] Annex B para 6.5) suggests that a flood peak with a 30-year return period should be 9.31 m ³ s ⁻¹ . In other words, a peak of this size should occur once every 30 years on average. The data show that there were 27 peaks in excess of this value in the 30 years since 1996. This suggests that the maximum	The Applicant does not agree that the comparison presented by SLD demonstrates that the modelled peak flows for Rodbourne Brook are seriously underestimated. SLD itself notes limitations associated with the Startley record, including that the station does not form part of the National River Flow Archive dataset referred to and that the record is affected by weed growth. A direct comparison between individual rated flow values from a monitoring station and FEH design-event estimates cannot be interpreted as a return-period analysis without establishing the suitability of the high-flow rating, data quality, catchment correspondence and the statistical basis of the observations being compared. The Environment Agency has independently reviewed the hydrological methodology used for Lime Down E2 and considers the FEH Statistical method and resulting design

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			flood peak for the Rodbourne Brook is being seriously underestimated.	flows reasonable. The Applicant therefore considers the regulator's technical review to provide the appropriate basis for the assessment.
SLD-102	Hydrology, Flood Risk and Drainage	Hydraulic Modelling Reports - Flow gauge data and modelled peak flows	2.6.15. For the Gauze Brook, the gauging site is called Rodbourne, ID530140 at Grid Reference ST9373184031. The site is approximately 1.25 km downstream of the Applicant's hydrological modelling area, increasing the catchment area by about 5%. It is a higher quality site than Startley, and although primarily designed to monitor low flows, higher flows are estimated from measured river level data from the gauge by the Environment Agency. The Applicant does not provide output peak flows from the Gauze Brook Modelling Report, but input flows are provided ([REP3-131] Table 3).	The Applicant notes the presence of the Rodbourne gauging site downstream of the Gauze Brook model extent. As SLD acknowledges, the gauge is downstream of the modelled catchment and therefore represents a larger contributing area. It is also primarily a low-flow monitoring site. The existence of this record does not provide a direct like-for-like comparison with the design flows applied at the upstream model boundaries. The updated Lime Down D - Hydraulic Modelling Report [REP5-095] submitted at Deadline 5, provides the supporting FEH hydrological assessment requested by the Environment Agency and has been submitted to enable the regulator to complete its review.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
SLD-103	Hydrology, Flood Risk and Drainage	Hydraulic Modelling Reports - Underestimation of peak flows	The 30-year return period input flow is given as 10.1 m³s⁻¹ – in other words this flow should be exceeded once every 30 years on average. The data show that this output flow was exceeded at least 25 times in the last 30 years. The highest flow was Storm Bert in November 2024. Storm Bert was approximately a 1% AEP event which should have a flow peak of 13.5 m³s⁻¹ according to Table 3. The observed flow peak for Storm Bert was 31.58 m³s⁻¹. This evidence, coupled with the observed flooding extent during Storm Bert being greater than the Applicant's modelling suggests it should be [REP1-176], indicates that the Applicant needs to revise their models so the results are more in line with the observed data. The Applicant should also publish modelled peak flow rates at the very least from the Area D modelling so it is possible to start to assess the risk of flooding off-site.	The Applicant does not agree that the comparison presented by SLD establishes that the Gauze Brook model underestimates design flood flows. The 31.58 m³/s value referred to by SLD relates to a rated flow estimate at a downstream gauging location, whereas the design flows cited from the hydraulic model apply to defined upstream model inflows and a different contributing catchment. Direct comparison of those values does not constitute a like-for-like flood frequency analysis and does not account for the suitability and uncertainty of the high-flow rating. Similarly, characterising Storm Bert as a particular AEP event requires an appropriate hydrological analysis and cannot be established solely by comparing an observed or rated peak with one model inflow. The Gauze Brook design hydrology has been revisited as part of the

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Environment Agency review and the supporting FEH calculation record is included in the updated Lime Down D - Hydraulic Modelling Report [REP5-095] submitted at Deadline 5. The separate Lime Down D - Natural Flood Management Viability Report [REP5-109] also uses the hydraulic model to assess downstream peak flows and flood conditions through Corston, demonstrating that the model is not limited to consideration of flood risk to Scheme infrastructure.
SLD-104	Hydrology, Flood Risk and Drainage	Hydraulic Modelling Reports – Sewage effluent contributions	2.6.16. The Applicant seems unaware that flow in the Gauze Brook is enhanced by sewage effluent from Grittleton, which is outside the Gauze Brook catchment area, and hence not included in input calculations. Though the volume of sewage as such will probably not be very material, the area has a problem with groundwater influx into foul drainage pipes which can increase	The Applicant notes the potential contribution identified by SLD. However, no quantified evidence has been provided to demonstrate that off-catchment sewage effluent or groundwater ingress to the foul sewer system makes a material contribution to the peak design-event flows relevant to the Gauze Brook hydraulic assessment. The design flood hydrology has been derived using established FEH

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			flows substantially. This is cited by Wessex Water as the main reason for the discharge of untreated sewage at Hullavington sewage treatment works, as the works becomes overwhelmed by the volume of input water. Wessex Water should be able to advise on the flows involved.	methods and has been subject to Environment Agency review. The Applicant does not consider that an unquantified continuous or intermittent contribution should be added to the design-event hydrographs in the absence of evidence that it materially affects the relevant flood peaks.
SLD-105	Hydrology, Flood Risk and Drainage	Hydraulic Modelling Reports – Dynamic modelling outputs	2.6.17. For both hydraulic modelling reports, the principal model output is the flood depth. Although the TUFLOW suite of models which were used can be characterised as dynamic models, dynamic results such as hydrographs, speed of onset (e.g. time to peak data), or flow velocities are not presented. This supports Stop Lime Down's contention in the Written Representation, Appendix F1 [REP1-174] that the Applicant's FRAs are concerned almost exclusively with the protection of	The Applicant does not agree that the hydraulic assessments are concerned almost exclusively with the protection of Scheme assets. The TUFLOW models are dynamic hydraulic models. The fact that flood depth and extent are the principal outputs presented within the site-specific FRA reporting reflects their relevance to the siting and resilience of infrastructure and the assessment of floodplain interaction. It does not mean that downstream hydraulic behaviour has not been considered.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			their own assets, and not with the risks of flooding off-site.	In particular, the Lime Down D - Natural Flood Management Viability Report [REP5-109] uses the Gauze Brook hydraulic model expressly to assess flood hydrographs, peak discharges and downstream flood conditions through Corston. The assessment demonstrates that the wider catchment response and downstream conveyance constraints govern existing flooding and directly evaluates the effect of potential interventions within Lime Down D on downstream flood risk.
SLD-106	Hydrology, Flood Risk and Drainage	Hydraulic Modelling Reports – Effects of the Scheme on off-site flooding	The modelling considers only the baseline case, and not how the Scheme would affect flooding either in terms of flood depth or flows off site. The Applicant relies on its claims that enhanced runoff from hardstanding areas will be adequately mitigated, and that there will be no enhanced runoff from panel areas given control of the ground conditions. Stop Lime Down	The Applicant does not agree that a separate with-development fluvial hydraulic model is required simply because limited Solar PV infrastructure is proposed within the modelled flood extent. The Environment Agency has expressly considered this matter in its Deadline 5 review of the Lime Down E2 model and confirmed that baseline-only modelling is appropriate because no

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			continues to dispute the second of these claims.	land raising is proposed within the modelled flood extents and the only Scheme elements within those extents are discrete Solar PV Panel supports. The Environment Agency considered the Applicant's volumetric displacement assessment adequate. The same assessment principle applies to the relevant panelled areas at Lime Down D. Formal hardstanding, including the BESS and substations, is separately assessed through the site-specific drainage strategy, while potential panel-related runoff mechanisms are comprehensively addressed in the Applicant's response to FHW2.9. There is therefore no basis for SLD's suggestion that the absence of a separate with-development fluvial model means that off-site flood risk has not been assessed.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
SLD-107	Hydrology, Flood Risk and Drainage	Water Crossing Schedule – Omission of Gauze Brook crossing	<u>9.38 Figure 9.9 Water Crossing Schedule [REP3-139]</u> 2.6.18. SLD are pleased to note that the Applicant has responded to its suggestion [REP2-051] of providing a map of the indicative watercourse crossing sites as [REP3-139]. They have not however responded to the point ([REP2-051] Appendix D para 15) that there is no crossing of the Gauze Brook in the original or revised Water Crossing Schedule [REP3-122], which is now obvious from the map. A crossing of the Gauze Brook will be essential to take power from the Area D and Area E 132 kV substations to the main 400 kV substation.	The Applicant does not agree that the absence of an explicit “Gauze Brook” label within the Watercourse Crossing Schedule demonstrates that the necessary crossing has not been considered. Appendix 9-9 Watercourse Crossing Schedule [REP3-122] and supporting figure Watercourse Crossing Schedule [REP3-139] form part of a wider crossing strategy. ES Volume 3 Appendix 11-1 Flood Risk Assessment and Drainage Strategy Covering Report [REP4-021] identifies the Main River crossings within the Main Site and the applicable crossing methodologies. In addition, the Scheme commitments expressly identify Gauze Brook as a watercourse across which cable installation will use HDD or another non-open-cut technique, with the cable installed a minimum of 5 m below the channel bed.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				The precise cable alignment remains subject to detailed design, but the environmental and construction principles governing any Gauze Brook crossing are therefore already identified and secured.
SLD-108	Hydrology, Flood Risk and Drainage	The Applicant's Response to Submissions Received at Deadline 4 - Sequential Test	<u>REP4-082– The Applicant's Response to Submissions Received at Deadline 4</u> 2.6.19. SLD-025: SLD maintains its position that the Sequential Test has been failed. The Applicant describes the situation in the second paragraph of its response: the Sequential Test is used to steer development to sites with the lowest risk of flooding– because there are sites with a lower risk, the Exception Test has to be used to justify going to Lime Down. The Applicant then describes how it uses the Exception Test, but the fact that it is using it at all demonstrates that the Sequential Test has been failed.	The Applicant does not agree with SLD's interpretation of the Sequential Test. The Sequential Test and Exception Test perform different functions. The application of the Exception Test where required for a particular development and flood-zone combination does not mean that the Sequential Test has "failed". The Exception Test is an additional policy test, not a remedial test that arises only following failure of the Sequential Test. The Scheme has applied the sequential approach both to the selection and design of the Scheme and internally to the siting of infrastructure. In particular, flood-sensitive infrastructure including the

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				BESS and substations has been located in Flood Zone 1, while the limited interaction of Solar PV Panels with higher-risk areas has been separately assessed for safety, resilience, floodplain conveyance and storage. The Sequential and Exception Tests are set out in the Planning Statement [REP3-081], and the Applicant's position remains as stated in its response to SLD-025 in the Applicant's Response to Submissions received at Deadline 3 [REP4-082].
SLD-109	Hydrology, Flood Risk and Drainage	Applicant's Response to Deadline 4 Submissions – Off-site flood risk assessment	2.6.20. SLD-026: The Applicant claims that its FRAs show that there will be no significant off-site flooding due to the Scheme. In fact, they do not assess off-site flooding at all, because to do so would require dynamic modelling which has not been provided (save for Areas D and E2). Even there, the modelling is used only to provide flood depths on	The Applicant has reviewed the content of SLD Appendix D and does not agree that the Flood Risk Assessments omit consideration of off-site flood risk or that dynamic modelling is a prerequisite for such an assessment across the Scheme. The site-specific FRAs expressly consider the potential impact of the Scheme on off-site flood risk. The

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			site and not dynamic parameters such as peak height and time to peak in the streams and rivers that drain the area. The claim that the Scheme will not increase off-site flooding is based on calculation of mitigation efficiency for impermeable surfaces coupled with the assumption that solar panels do not affect runoff. The latter assumption has been shown to be false by the modelling now described in SLD Appendix D.	assessment is mechanism-specific and proportionate. Formal hardstanding is positively drained, attenuated and discharged at restricted rates; panelled areas remain predominantly permeable and are subject to the soil, vegetation and runoff controls addressed in FHW2.9; and targeted dynamic hydraulic modelling has been undertaken where material fluvial interaction occurs at Lime Down D and Lime Down E2. The Environment Agency has agreed that site-wide fluvial hydraulic modelling is not required and that the targeted, proportionate assessment approach is appropriate. The Lime Down D - Natural Flood Management Viability Report [REP5-109] also directly considers downstream flood depths and flows through Corston. The Applicant therefore maintains its conclusion that the Scheme will not increase flood risk elsewhere.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
SLD-110	Hydrology, Flood Risk and Drainage	Applicant's Response to Deadline 4 Submissions – Storm Bert flooding photographs	2.6.21. SLD-027 and SLD-028: These points concern the photograph of extensive flooding in Area D due to Storm Bert, and the implications for the Applicant's flood modelling. On both these points, the Applicant provides lists of information which could never be determined from an image, and have never been claimed to do so by Stop Lime Down, such as rainfall return periods, antecedent conditions, blockage conditions.	The Applicant's previous response did not suggest that SLD had claimed that rainfall return period, antecedent conditions or blockage conditions could be determined from the photographs alone. Those factors were identified because they are necessary to understand the hydraulic significance of an observed flood and to compare that observation quantitatively with a particular modelled design event. A photograph can provide useful qualitative evidence that flooding occurred, but it does not by itself establish the flood level, complete flood extent, event probability, antecedent conditions or hydraulic controls operating at the time. The Applicant therefore maintains that the photographs cannot, without the supporting hydrological and surveyed information, demonstrate that the submitted model under-predicts the design flood extent.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
SLD-111	Hydrology, Flood Risk and Drainage	Applicant's Response to Deadline 4 Submissions – Photograph timing	2.6.22. The Applicant also states, at both SLD-027 and SLD-028, that "The photographs are oblique views taken during a storm event. They cannot be accurately or definitively located, time checked, or used to identify the flood extent." This is incorrect. All image files have embedded a hidden file of metadata called an EXIF file, which records information about the image depending on the technology used to take it. It can be accessed using a suitable program.	The Applicant notes SLD's clarification regarding EXIF metadata. Original digital image or video files may contain metadata recording capture time and location, although such metadata is not necessarily retained when files are extracted, converted, reproduced or submitted. Where intact metadata is available from an original source file, it may assist in establishing when and approximately where an image was captured. It does not, however, resolve the other limitations identified by the Applicant concerning the use of an oblique photograph as quantitative hydraulic model validation.
SLD-112	Hydrology, Flood Risk and Drainage	Applicant's Response to Deadline 4 Submissions – Photograph timing	The EXIF file for the original video used to produce the images in SLD's Written Representation, Appendix F1 [REP1-174], states that it was taken on 24.11.2024 at 15:26:11, more than 3 hours before the flood peak as stated in [REP1-174]. As the phone camera included a GPS, the	The Applicant notes the date, time and coordinates reported by SLD from the original video metadata and SLD's offer to provide the source file. Even if those metadata are verified, they establish only the reported capture time and location. They do not provide a surveyed flood level or complete

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			location was recorded as 51° 33' 9.00" N; 2° 7' 19.92" W; 73.401 m ASL. This is the location shown on Figs 3 and 4 in [REP 174]. The angles of view in the figures were determined from landmarks in the photographs: the fence line, West Park Wood and Bradfield Wood. The position of the photograph is thus known to the nearest metre, the time to the nearest second, and the only limitation on assessment of the flood extent is that it clearly extends outside the picture boundary. SLD would be happy to supply the video file to the ExA and the Applicant on request to verify the EXIF data. We recommend metadata2go as the access program.	flood boundary, nor do they establish rainfall return period, antecedent catchment conditions, downstream hydraulic controls or the peak discharge associated with the event. The stated GPS coordinates also do not, in themselves, demonstrate positional accuracy to the nearest metre. SLD further states that the image was captured more than three hours before the reported flood peak. It therefore does not represent the maximum flood condition for the event. The Applicant consequently maintains that the photographs are useful qualitative evidence of flooding during Storm Bert, but do not provide a quantitative basis for concluding that the design-event flood extent in the updated hydraulic model has been underestimated. The modelled assessment, supported by the updated hydrology and Environment Agency

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				review, remains the appropriate basis for determining design flood risk.
SLD-113	Hydrology, Flood Risk and Drainage	Applicant's Response to Deadline 4 Submissions – Storm Bert flood extent	2.6.23. The relevant point made by the Applicant is that "The Applicant does not agree that the photographs demonstrate that flood extents were greater than predicted by the Applicant's assessment". SLD continues to maintain that the photographs show exactly that. As described in SLD's Written Representation, Appendix F1 [REP1-174], Storm Bert was approximately a 1% AEP event which should correspond to Flood Zone 3. The photographs clearly show that the flood extent was greater than that predicted by the Applicant's modelling of this event as shown in ES Appendix 11-6: Flood Risk Assessment and Outline Drainage Strategy– Lime Down D Rev 4 [REP4-032]. Coupled with other evidence of underestimation (see Appendix D) it calls into question the Applicant's conclusions	The Applicant notes that SLD maintains its position but does not agree that the Storm Bert photographs demonstrate that the submitted hydraulic modelling underestimates the 1% AEP flood extent. SLD's comparison conflates the probability attributed to the wider storm event with the probability of the fluvial flow experienced within Gauze Brook. Characterising Storm Bert as approximately a 1% AEP event does not establish that Gauze Brook experienced a 1% AEP peak flow at Lime Down D. The response of an individual watercourse depends on the spatial and temporal distribution of rainfall, antecedent catchment conditions, catchment response and the resulting timing and magnitude of the river hydrograph. A direct equivalence between the reported rarity of the storm and the modelled 1%

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			from its FRAs, particularly concerning off-site flooding.	AEP fluvial event cannot therefore be assumed. There is also an important temporal distinction. SLD confirms in SLD-112 that the source video was recorded more than three hours before the reported flood peak. The imagery therefore represents conditions at a particular point during the event, rather than the maximum flood extent, and cannot appropriately be compared directly with the maximum spatial extent generated by the modelled 1% AEP design-event hydrograph. The Applicant acknowledges that the EXIF information identified by SLD may assist in establishing the reported time and location of the imagery. It does not, however, provide surveyed flood levels or a complete flood boundary, nor does it distinguish with certainty between fluvial flooding from Gauze Brook and any coincident local surface water or drainage response. The photographs remain useful qualitative evidence that

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				flooding occurred, but they do not provide a quantitative validation dataset from which the design-event flood extent can be redrawn. The hydraulic assessment should therefore be considered on the basis of the hydrological and hydraulic evidence supporting the model. The updated Lime Down D - Hydraulic Modelling Report [REP5-095] incorporates the additional FEH hydrological information and extended detailed channel survey requested through the Environment Agency's technical review. The separate assertions regarding gauged flows, design hydrology and off-site flood risk are addressed in SLD-100 to SLD-106. Taken together, the evidence presented by SLD does not demonstrate that the modelled 1% AEP flood extent has been underestimated or alter the conclusions of the Lime Down D FRA.
SLD-114	BESS Fires	FRA and ODS –	2.7.BESS Fires	As documented in the Applicant's Outline Battery Safety Management

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		Firewater containment arrangements	<u>REP4-032–ES Appendix 11-6: Flood Risk Assessment and Outline Drainage Strategy– Lime Down D Rev 4</u> 2.7.1. Appendix 11-6 also deals in outline with firewater retention (para 3.11), which is also covered by the documents Firewater Containment and Drainage Strategy– Lime Down D BESS [REP3-118], Firewater Containment and Drainage Strategy– Lime Down Substation [REP3-120] and the Outline Battery Safety Management Plan [REP3-106] submitted in the latest revision at Deadline 3. None of these documents have much detail. While principles are described in the documents, the nature and location of the water containment apparatus is not specified.	Plan (Outline BSMP) [REP3-106], Dorset & Wiltshire Fire and Rescue Service (D&WFRS) has approved the illustrative BESS area design (including a review of the illustrative site design plans) which fully complies with NFCC guidance and NFPA 855 (2026) safety requirements. Section 5.3.2 of the Outline BSMP [REP3-106] stipulates: The BESS Area will be designed to integrate firefighting designed to integrate pressure fed (pump driven) fire hydrants fed from water tanks. Hydrants will be located in consultation with D&WFRS to provide redundancy and safe operating distances for firefighters. They must be clearly marked with appropriate signage. They will be easily accessible to D&WFRS vehicles, and their siting should be considered as part of a risk

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				assessed approach that considers potential fire development / impacts. Outlets and connections should be agreed with D&WFRS, no BESS enclosure will be further than 90 m from a fire hydrant. The firefighting water requirement will be fully assessed at the detailed design stage based upon analysis of Large Scale Fire Testing (LSFT) of the BESS design plus any additional BESS fire and explosion test data by an independent Fire Protection Engineer, water storage volumes will be agreed with D&WFRS during detailed design. By definition, final BESS area design and drainage system design can only be finalised at the detailed design stage when a BESS system is selected, and full fire test data and

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				consequence modelling reports are available. The implementation of the Outline BSMP [REP3-106] is secured through a Requirement in Schedule 2 of the Draft DCO [REP5-012]. This stipulates that a detailed Battery Safety Management Plan will be submitted to and approved in consultation with D&WFRS, the Environment Agency (EA), and by the relevant planning authorities prior to the commencement of the works for the BESS. This plan will be substantially in accordance with the Outline BSMP [REP3-106]. The Applicant also notes that the containment approach is more developed than SLD suggests. ES Volume 3 Appendix 11-6: Flood Risk and Drainage Strategy Lime Down D [REP5-055] confirms that the BESS and substation drainage systems will be designed to be isolatable in the event of a fire or pollution incident, including the use of lined drainage

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				components where required, controlled outfalls and shut-off valves to prevent uncontrolled discharge to ground or surface water. Retained firewater will be held within the drainage system, sampled and tested, with the subsequent disposal route determined in consultation with the Environment Agency. The precise configuration and location of the containment infrastructure are appropriately reserved for detailed design because they depend upon the final BESS technology, fire testing data, firefighting water requirement, drainage catchments and final layout. The Environment Agency has already agreed the principle of an impermeable, sealed and isolatable drainage system and the approach to retained firewater disposal. The Applicant therefore does not consider that fixing the detailed containment arrangement at this stage would

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				provide any additional environmental certainty.
SLD-115	BESS Fires	FRA and ODS – Firefighting water storage and disposal	Firefighting water will be supplied in two tanks of 228 m3 each, with a pumped connection to fire hydrants located round the site. The potentially contaminated water will be collected and stored. It will only be released after analysis shows it is safe to do so, and if not will be tankered off the site to an “approved facility”. This would be a major operation. The water storage would be the same system described above, assessed assuming a concurrent 1 in 10 year rainfall event. Though the ExA queried whether this was enough, I think it is a defensible figure in terms of likely risk. This arrangement has apparently been agreed by the Dorset and Wiltshire Fire and Rescue Service (see below).	The Applicant notes that SLD considers the adopted concurrent 1 in 10-year rainfall event to provide a defensible basis for the firewater containment assessment. As set out in ES Volume 3 Appendix 11-6 Flood Risk and Drainage Strategy Lime Down D [REP5-055], potentially contaminated firewater will be retained within the isolatable drainage system, sampled and tested, and either appropriately discharged subject to the relevant approvals or removed by tanker to an appropriately permitted facility where required. The detailed containment volume and configuration will be confirmed through detailed design once the final BESS technology and firefighting water requirement are known. The overriding requirement is that contaminated firewater and the applicable concurrent rainfall volume can be contained

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				without uncontrolled discharge to ground or surface water.
SLD-116	BESS Fires	FRA and ODS – Adequacy of firefighting water supply and containment capacity	2.7.2. The volume of firefighting water would provide 4 hours at the recommended rate of 1900 l min ⁻¹ , though the Applicant points out this is reduced to 1500 l min ⁻¹ in the latest guidance. The main concern for SLD here is whether this would be sufficient time given the current evidence on the length of time BESS fires take to burn out, where would additional water would come from if more were needed (the ExA also questioned this), and whether the storage system could cope with this extra water. None of this is addressed in the current documents.	The Applicant's Outline BSMP [REP3-106] illustrative design includes two water tanks, each with approximately 228,000 litres of water which would provide 5 hours of continuous fire hose discharge at 1500 LPM. As stipulated in the Outline BSMP [REP3-106] (Section 5.3.2), the firefighting water requirement will be fully assessed at the detailed design stage based upon a comprehensive review of BESS fire and explosion test data for the selected BESS system by an independent Fire Protection Engineer and water storage volumes will be fully agreed with the Fire & Rescue Service. If firefighters are applying water fog or spray patterns to adjacent BESS enclosures or deploying defensive spray plates that form a water curtain between the affected enclosure and adjacent BESS these "boundary

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				cooling" tactics would likely be applied intermittently in 15-minute application periods with internal and external BESS temperature changes measured between application periods. This means that 456,000 litres of water provided in the illustrative design will last for far longer than a 5 hour duration. The Applicant confirms that firefighting water supply and pollution containment for the BESS agreed at the detailed design stage will be designed on the basis of credible incident scenarios, including the potential for multiple BESS enclosures to be involved, and is not limited to routine or minor events. The final agreed volume will ensure that secondary water supplies and further drainage capacity is not required for any credible BESS fire scenario. The final containment system will be sized to accommodate the firefighting water requirement established for the

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				credible design fire scenario, together with the applicable concurrent rainfall allowance. The drainage system will be sealed and isolatable, preventing uncontrolled discharge to ground or surface water and providing a closed containment loop within which retained firefighting water may also be recirculated or reused during the incident where appropriate. The Applicant therefore does not agree that additional firefighting water would necessarily create an unaccounted-for containment requirement, as both the required water supply and corresponding containment capacity will be established together through detailed design.
SLD-117	Climate	The Applicant's Response to Submissions Received at Deadline 3 - Climate Change	2.8.Climate <u>The Applicant's Response to Submissions Received at Deadline 3 [REP4-082]</u> 2.8.1. [SLD-062] In Appendix J2 of Stop Lime Down's WR, [AS-020] the Applicant was criticised for using	The Applicant confirms that historical Yeovilton data can be accessed via the active link, here: https://www.metoffice.gov.uk/pub/data/weather/uk/climate/stationdata/yeoviltondata.txt

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		Assessment rainfall data	rainfall from Yeovilton, 68 km distant from Lime Down, in its Climate Change Assessment in Chapter 7, leading to a substantial underestimation of rainfall, when there were at least 11 approved Met Office sites closer to Lime Down. The Applicant continues to cite a Met Office website as justification for this, and reproduces the url in [REP4-082] SLD-062. This website no longer exists, but was never appropriate in any case. Data can now be accessed via the Met Office climate data portal at https://climatedataportal.metoffice.gov.uk/ .	Cirencester data are not available from this site.
SLD-118	Climate	The Applicant's Response to Submissions Received at Deadline 3 - Consistency	Stop Lime Down notes that the Applicant uses Hadley Centre Gridded Rainfall data as rainfall input for the site hydrological risk assessments (Flood Risk Assessment and Outline Drainage Strategy Rev 4, Appendices 11-2 to 11-8; [REP4-024] to [REP4-036]). This was recommended in Appendix	The Applicant makes note of this comment. Historical Yeovilton meteorological data is used to inform the baseline situation only. The future baseline uses UKCP18 probabilistic projections for a 25 km ² grid square that encompasses the Scheme's location. The scenario that has been considered is for a 'high emissions

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		of rainfall data	J2 Table 1, and is an appropriate value to use, giving substantially higher rainfall than Yeovilton. This raises the question of whether the Climate Change Assessment in Chapter 7 is still based on the low value from Yeovilton, and what conclusions, if any, have been drawn from it.	scenario' (RCP8.5) - a pathway where greenhouse gas emissions continue to grow unmitigated, leading to a best estimate global average temperature rise of 4.3°C by 2100. This is therefore considered to be a precautionary scenario with regard to the likely future baseline. The Scheme has been designed, as far as practicable, with embedded mitigation to avoid and reduce impacts of and effects on Climate Change. Embedded Mitigation is detailed in ES Volume 3, Appendix 11-1: Flood Risk Assessment and Outline Drainage Strategy Covering Report [REP4-021], in which the FRA has informed. Surface water management has been considered in ES Volume 3, Appendix 11-1: Flood Risk Assessment and Outline Drainage Strategy Covering Report [REP4-021].

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
SLD-119	Climate	The Applicant's Response to Submissions Received at Deadline 3 - Shunt reactors and carbon accounting	2.8.2. Further, as a standalone point, SLD have noted the length of the CRC elsewhere in its submissions. SLD note that, in other schemes, significant CRCs have required shunt reactors as part of the development. From a carbon accounting perspective (among other issues), SLD would welcome clarity on whether this development requires shunt reactor(s).	The requirement for shunt reactors has been considered as part of the electrical design of the Scheme. Shunt reactors were not separately quantified within the greenhouse gas emissions assessment. If required as part of the final design, their embodied carbon would represent an additional source of emissions associated with the electrical infrastructure. Given the scale of the overall Scheme, this contribution is expected to be small relative to the other embodied carbon sources, including the photovoltaic modules, BESS and other major electrical infrastructure.
SLD-120	Soils, agriculture and ground conditions	Applicant's Response to Deadline 3 Submissions – Establishment and maintenance of vegetation	2.9. Soils, agriculture and ground conditions <u>The Applicant's Response to Submissions Received at Deadline 3 [REP4-082]</u> 2.9.1. The Applicant cites a study by Solar Energy UK in support of its contention that vegetation can establish and persist under solar	Grass beneath each row of solar panels will be subject to the same shading effects irrespective of the size of the solar farm. The Applicant is not able to comment on the specific volunteer-led management of community solar farms, however it is considered very likely that management of the grass would utilise techniques such as mowing and

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		beneath panels	panels, though they concede that vegetation cover is likely to be limited. The study does indeed show some encouraging results on establishment and biodiversity, but it is based on a sample of solar sites whose mean area is only 16 ha and mean electrical capacity 9 MW. Small community-owned sites often benefit from free volunteer labour. The logistical and financial commitments required to achieve similar results at Lime Down, which is 50 times larger, are grossly underestimated by the Applicant in their Outline LEMP [REP3-100].	grazing which respectively will or could be used within the Scheme.
SLD-121	Soils, agriculture and ground conditions	Farming and Food Security Technical Note – Effects on farming and food security	<u>REP4-079- Farming and Food Security Technical Note</u> 2.9.2. The Applicant has prepared a technical note on farming and food security within the solar PV sites. Within the document, the Applicant argues that the Scheme aligns with policy by favouring lower-grade land, that there will be “little to no change	The Applicant agrees with this comment.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			to the farming operations" and "the loss of the agricultural land use is not significant at a county scale." and will have a negligible practical impact on the affected farms' food output and represents a negligible effect on local and national food security overall.	
SLD-122	Soils, agriculture and ground conditions	Farming and Food Security Technical Note – Agricultural Land Classification	2.9.3. At paras 2.2.9-2.2.14 the Applicant suggests that because the ALC system is a qualitative scale and expected to be updated by 2028, that the conclusions which can be drawn in respect of food production are less reliable. However, the ALC system is an independent assessment of agricultural potential and the "only approved system for grading agricultural quality in England and Wales" (NPS EN 3, para 2.10.33). It remains the tool by which this scheme is required to be assessed (NPS EN-1 §5.11.34, NPS EN-3, para 2.10.29-2.10.30) and the Applicant is required to seek to	The Applicant agrees with this comment and reiterates that the ALC system is based upon conditions of the 1970's.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			minimise impacts on agricultural land by reference to the land classifications. (NPS EN-1, para 5.11.12).	
SLD-123	Soils, agriculture and ground conditions	Farming and Food Security Technical Note – Loss of BMV agricultural land	2.9.4. The Applicant has conducted their own ALC assessment which acknowledges that of the 720 hectares of agricultural land within the Solar PV Sites, 240.1 hectares of the land is BMV land ([REP1-064], para 1.3.38)– or 33% of the agricultural land. All of this land will be taken out of agricultural production during the lifetime of the Scheme.	The Applicant agrees with this comment.
SLD-124	Soils, agriculture and ground conditions	Farming and Food Security Technical Note – Landowner evidence and assessment methodology	2.9.5. The Technical Note relies on responses received from some landowners in respect of the effects of implementing the Scheme on the affected farm holdings. The questionnaire which was provided to landowners has not been shared, nor are the maps of the landholdings to support the statements which have been made. In any event, such	Maps of the full extents of the private property of each landowner are neither necessary nor pertinent to the assessment of effects within the Scheme boundaries. The questionnaire sought to establish the total area farmed by each holding, the crop rotations, any constraints or challenges to farming the land, and foreseeable changes to management of the

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			comments do not provide the Soils, agriculture and ground conditions objective and independent analysis of land quality and capability provided by assessment (i.e. the ALC assessment pursuant to MAFF Guidelines).	business arising from the presence of the Scheme. The structure of the questionnaire is reflected in the structure of the responses in the Farming and Food Security Technical Note [REP4-079]. The ALC guidelines are based on several assumptions including that "The grading does not necessarily reflect the current economic value of land, land use, range of crops, suitability for specific crops or level of yield." This information can only come from the landowners and farmers and provides a more detailed picture of the actual capability and constraints of the land.
SLD-125	Soils, agriculture and ground conditions	Farming and Food Security Technical Note – Agricultural land use and capability	2.9.6. Most of the responses focus on the current management of the landholding and the loss of agricultural production in the short-term. They conflate the current use of the land with its capability for the lifetime of the Scheme. For example, Landowners 1, 2, 4 and 5 note that	The Applicant notes that the existence or participation in an ELM scheme does not, in itself, alter the underlying agricultural land classification or inherent capability of the land. Reference to ELM scheme participation has been included to provide context regarding the current management of

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			some of the land is held under ELM agreements or within ELM schemes that are currently active. However, the existence of an ELM agreement is not evidence that the land lacks agricultural capability.	the affected holdings, where landowners have sought to increase farm business resilience by enrolling less productive land into ELM schemes. The Applicant is not able to comment on future government policy targeted towards farming subsidies.
SLD-126	Soils, agriculture and ground conditions	Farming and Food Security Technical Note – Effects on farming operations	2.9.7. Plainly, however the Scheme will have an impact on actual farming operations on the Solar PV Sites through the loss of farmable areas. The Applicant understands the loss of agricultural land for the production of animal feed and indirect effects on food production. For example, in respect of Landowner 4, there would clearly be indirect impacts on food production where the loss of land will affect the provision of feed for cattle on the holding.	Each landholding already accommodates fields that are not actively farmed but could be brought back into production. Although there will be a loss of farmable area within the Solar PV Sites, there will not necessarily be losses of farmable areas across the holdings in their entirety. The information attained for the tenanted land in the holding of Landowner 4 does not go into such detail as their level of self-sufficiency; it is unknown if they currently produce a surplus of feed they are able to sell or if their home-grown supply requires supplementing. Therefore, the exact effect on the provision of feed for the

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				cattle is not known but the Farming and Food Security Technical Note [REP4-079] assumes a worst-case and acknowledges that feed would need to be bought in. The tenanted holding does have land in ELM. There is potentially an opportunity for this land to be used to make up any deficits.
SLD-127	Soils, agriculture and ground conditions	Farming and Food Security Technical Note – Effects on farming operations	Additionally, SLD has received the following comment from a tenant farmer within the Solar PV Sites: <i>"My loss of approximately 85 acres of good cereal growing land, assuming that is all under winter wheat would result in a loss of approximately 250 tonnes at a value of £47,500 at today's prices. Add this to the other land in Rodbourne that is suitable for cereal growing and the figures would read at approximately 750 tonnes of wheat at a value of £142,500. Obviously, these arable fields are grown on rotation and sometimes would have a crop of maize, oats or grass for fodder. Most</i>	The Applicant notes these comments supplied to SLD build greatly on the requested information at CA1.27 of the Examining Authority's First Written Questions (ExQ1) [PD-010] and welcomes the more detailed information. The productivity of these land parcels for agricultural yields and their potential for alternative crops is recognised, as their high megawatt-per-hectare ratio for solar generation, however these comments highlight how the ALC grading and the land use are not intrinsically linked, and in terms of food security, how boosting the domestic supply of high-value produce could be

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<i>of the crops grown in the village would not go directly into the human food chain, unless a good crop of oats went for biscuits/porridge or a crop of milling was good enough for bread making. Rodbourne has always supported a lot of dairy and beef cattle so the majority of the food grown would be fed to the cattle for milk and meat. Just a note about my 85 acres grade 2 listed land. The sand over clay would have great potential for growing potatoes/ root vegetables. Land between Great Somerford and Startley which is very similar to mine is growing decent crops of commercial vegetables for human consumption."</i>	accommodated by farming existing under-utilised high-quality land to its full potential. As the comments allude to, there are other land parcels within the local area which can grow suitable commercial crops including vegetables. As set out in response to CA1.27 the Applicant's Response to the Examining Authority's First Written Questions [REP3-128] and to CA2.4 (BoR Plot numbers - 07-041, 07-042, 07-043, 07-044, 07-045) and CA2.7 of the Applicant's Response to the Examining Authority's Second Written Questions [REP5-097] discussions regarding engagement to establish compensation and surrender arrangements between the landowner and tenant, supported by the Applicant, have been offered with a view to voluntary agreements being achieved, as has been the case where agreements have already been

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				reached relating to other tenancy arrangements within the Schemes Order Limits. Any arrangements found to be agreeable between the parties would provide the tenant with the commercial opportunity to secure or farm alternative parcels in the local area where available, ensuring that those who wish to continue their agricultural practices can do so.
SLD-128	Soils, agriculture and ground conditions	Farming and Food Security Technical Note – Loss of agricultural production	2.9.8. Connectedly, it is unclear whether landowners are commenting upon the reasonable worst case for the loss of agriculture production. It appears landowners are commenting upon what they understand to be the effect on their land. For example, Landowner 1 also comments that farming operations <i>“are anticipated to be unaffected by the Scheme”</i> and as a result <i>“there will be no associated loss of food production or impact on food security.”</i> There is no assessment of what agricultural	The reasonable worst-case is that all of the agricultural land within the Solar PV Sites will be unavailable for food production for the full duration of the Scheme.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			production would be lost in a reasonable worst case scenario.	
SLD-129		Open Floor Hearing 2 – SLD evidence and experience of living with the Scheme	2.10. Open Floor Hearing 2 <u>REP4-088– Written Summary of the Oral Submissions at the Open Floor Hearing 2 and the Applicant's Responses</u> 2.10.1. SLD does not provide individual specific submissions in response to those included at DK-001 to DK-007. As will have been apparent from Mr. Kozelko's oral submissions, the position he set out relied upon the assessments and commentary of SLD's experts. That evidence should be considered when understanding the submissions that were made at the Open Floor Hearing. Ultimately, what this hearing provided an opportunity to do was to paint a picture of the experience of living with the Scheme. SLD maintains that that is	The Applicant notes this comment.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			what Mr. Kozelko presented by his three walks around the area.	

Table 3-12 Stop Lime Down: Response to the ExA's Second Written Questions

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
SLD1-001	Site Selection and Alternatives	Consistency	ALT2.1 Site Selection Process – Consistency Q1 <i>The applicant's Technical Note on Site Selection Assessment [REP2-043] sets out, in Table 4-1, areas of newly drawn Potential Development Areas (PDAs) with all constraints removed. However, it neglects to provide a figure for PDA 10 (the site subject of this application) on the basis that the document focuses on alternatives to the current site. However, the ExA requires Table 4-1 to be updated to include PDA 10 to provide an overall comparison between sites to ensure that a</i>	The Applicant has provided a response to the ExA's question in the Applicant's Response to the Examining Authority's Second Written Questions [REP5-097]. In addition, the Applicant has produced a response to SLD's Appendix E of its Deadline 5 submission including a further plan of PDA 10 as requested. Please see Applicant's Response to Stop Lime Down's Deadline 5 Submission Appendix E: Site Selection and Cable Route [EN010168/EXAM/9.73] submitted at Deadline 6.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<i>consistent site selection process was undertaken.</i> 3.1.1. SLD welcomes this question, which also mirrors its request at para 6.1.13 of [REP3-173]. SLD consider that it would also assist to have a map in a similar format to that at Figure 4-6 of [REP2- 043] so that some insight into the removals can be understood.	
SLD1-002	Cultural Heritage	Fosse Way	CH2.3 Direct Impacts to the Fosse Way <i>Wiltshire Council's response [REP2-046] to Stop Lime Down's concerns regarding the direct impacts on the Fosse Way stated that: "Wiltshire Council Archaeology Service (WCAS) considers that there is no direct impact on the Roman road itself, which has already been heavily impacted by modern road construction. Its relationship to the</i>	The Applicant agrees with WCAS that there would be no impact to the Roman Road as a result of the Scheme. The Applicant also concurs with WCAS that there is no visual relationship between the road and any archaeological sites.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<i>archaeological sites identified by the geophysical survey will remain unchanged if the solar farm is constructed, as the heritage assets to the southeast of the road are sub-surface features, so there will be no visual impact to their relationship, which is purely spatial. Those sites impacted by development will be preserved by record, knowledge which will add to understanding of the landscape."</i> <i>Stop Lime Down is asked to respond to this and confirm if it maintains that there would be a direct moderate adverse (significant) effect on the Fosse Way?</i> 3.1.2. SLD maintains its conclusion that there would be a moderate adverse (significant) effect on the	

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			Fosse Way. This is considered to be made up of three elements, which are a combination of direct and indirect impacts. These are:	
SLD1-003	Cultural Heritage	Fosse Way	The localised direct impacts upon any potential archaeological remains of the Fosse Way;	See response to SLD1-002, the Applicant and WCAS are in agreement that the Scheme would not cause any localised direct impacts to the Fosse Way.
SLD1-004	Cultural Heritage	Fosse Way	The direct impacts upon archaeological remains contemporary with the Fosse Way, beyond the limits of the no-dig zones set out by the Applicant; and	While Roman remains have been identified adjacent to the Road, the Applicant does not consider any potential impact to these remains as causing a consequential or associative impact to the Fosse Way.
SLD1-005	Landscape and Visual Cultural Heritage	Fosse Way	The indirect impacts through the loss of the spatial and visual relationship between the buried remains of the Fosse Way and cotemporary sites with the Proposed Development through the introduction of large-scale solar PV infrastructure. Marrons	The Applicant acknowledges Historic England GPA Note 3 regarding the setting of archaeological assets and that they can still be appreciated if the asset is "obscured or not readily visible."

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			highlight the following statement in Historic England's Good Practice Advice in Planning Note 3 in relation to the setting of buried remains: "Heritage assets that comprise only buried remains may not be readily appreciated by a casual observer. They nonetheless retain a presence in the landscape and, like other heritage assets, may have a setting ... the form of survival of an asset may influence the degree to which its setting contributes to significance and the weight placed on it, it does not necessarily follow that the contribution is nullified if the asset is obscured or not readily visible."	The Applicant considers the term contemporary to refer to Roman sites of a similar date to the construction of the Road, but for completeness will respond with reference to all archaeological sites identified in close proximity to the Road. While the Applicant acknowledges a level of spatial relation between the road and settlement activity adjacent to it, the Applicant does not agree with the assertion that indirect (setting) affects would be caused to the road through the introduction of solar PV panels and associated infrastructure between the Fosse Way and archaeological sites identified within the Scheme. The Applicant highlights that since its construction in the early Roman period, the Fosse Way has traversed a dynamic and

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				transient landscape between Exeter and Lincoln. Many settlements have developed adjacent to the Road as a result of the transport and communication links it provides. This includes the numerous former Roman settlements that survive only as buried archaeological sites along its route. The presence of archaeological remains adjacent to the Fosse Way does not create a dependent relationship. Rather such remains contribute to our wider understanding of archaeological settlement patterns with consideration to landscape features and wider research questions relating to the growth and decline of former human settlement and activity. As such the Applicant maintains its position that the Scheme

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				would not cause any impacts to the Fosse Way.
SLD1-006	Cultural Heritage	Impacts to Avil's Farmhouse	CH2.8 Avil's Farmhouse (Grade II) <i>The applicant [REP2-039], in response to Stop Lime Down's WR [REP1-167], states that it welcomes Stop Lime Down's conclusion of a negligible adverse effect on Avil's Farmhouse. As this would be an increased residual effect from the neutral effect reported in appendix 12-8 of the ES [APP-232], the applicant is asked to confirm if there would be 'less than substantial harm' to Avil's Farmhouse?</i> 3.1.3. Following the methodology and approach of the Applicant within their submission documents, a negligible adverse effect should	The Applicant's assessment concludes that there would be no harm to Grade II listed Avil's Farmhouse (NHLE 1022396). The Applicant notes SLD clarity that they consider there to be a negligible adverse effect should equate to less than substantial harm.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			equate to less than substantial harm.	
SLD1-007	Cultural Heritage	Impacts to Avil's Farmhouse	CH1.13 Noise Impacts <i>In response to Stop Lime Down's WR [REP1-167], it is noted that the applicant states [REP2-039] that the noise impact on built heritage assets has been assessed to not constitute a significant effect on health and quality of life. The applicant is asked whether the significance of effect on health or quality of life is an appropriate threshold for determining whether noise from the proposed development would have an adverse impact on the setting of heritage assets or whether noise can have a significant effect on the setting and understanding of a heritage asset without crossing the</i>	The Applicant concurs that it identified a negligible adverse effect to Townleaze Barn (HER: MWI65981).

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<i>threshold of significance for health or quality of life? In response, please provide references to any relevant guidance.</i> Wiltshire Council, Historic England and Stop Lime Down may also wish to comment on this matter 3.1.4. This approach was applied to Townleaze Barn (HER: MWI65981). For example, at Appendix 12- 8 (Cultural Heritage Impact Assessment Tables, Table 15, [APP-232]) the Applicant identifies a Negligible residual effect in relation to Townleaze Barn within the tabulated format. This is subsequently reported as less than substantial harm within Chapter 12 Cultural Heritage [APP064] and Table 16 of the Heritage Statement [APP-219].	

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
SLD1-008	Noise and Vibration	Noise Impacts on Heritage Assets	3.1.5. The Applicant has conflated the impact of noise on health and quality of life with the level of impact on the setting of a heritage asset. The significance of effect on health or quality of life is not an appropriate threshold for determining whether noise from the proposed development can have a significant effect on the setting of heritage assets. The two are not interconnected and there is separate and distinct guidance for each.	In its response to the Examining Authority's Second Written Questions [REP5-097] , the Applicant acknowledged that health or quality of life is not a threshold for determining whether noise from the Scheme would have an adverse effect on the setting of a heritage asset (see CH2.13 in Applicant's Response to the Examining Authority's Second Written Questions [REP5-097]).
SLD1-009	Noise and Vibration	Noise Impacts on Heritage Assets	3.1.6. This approach was confirmed by the Inspector in APP/X2600/W/24/3356489 (2025) who stated in relation to the PPG noise limits that; "These PPG limits relate to amenity, or nuisance noise, and this is different from the way in which heritage assets are experienced in their settings. The acoustic character of the area around a heritage asset also contributes to the surroundings	The Applicant refers SLD to its response to CH1.13 (see CH2.13 in Applicant's Response to the Examining Authority's Second Written Questions [REP5-097]) which states: " <i>When considering the assessment of harm to heritage assets as a result of indirect impacts, consideration has been given to changes in background noise where it has</i>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			within which the asset is experienced. In this context, the effect of noise has to be considered differently from nuisance noise." (para 32).	<i>the potential to alter the setting of an asset.</i> <i>Consideration has been given to the results of the noise assessment to aid in the identification of areas where there is a potential for an increase in noise levels as a result of the Scheme (for example modelling in ES Volume 3, Appendix 14-4: Noise Modelling [REP1-061]).</i> <i>A contributing factor when considering the setting of an asset is how a human receptor appreciates or experiences a heritage asset and the immediate environment it is located within. As such health or quality of life are not as such a threshold for determining whether noise from the Scheme would have an adverse effect on the setting of a heritage asset and the Applicant agrees that noise can affect</i>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				<i>heritage setting without causing a significant health or quality-of-life effect."</i>
SLD1-010	Noise and Vibration	Noise Impacts on Heritage Assets	3.1.7. The Inspector clearly states at para 33 that "although the noise levels would be within the guidelines set out in the PPG, changes to the noise climate in the vicinity of a heritage asset will have an effect on the way in which that asset is experienced."	See response to SLD1-009.
SLD1-011	Noise and Vibration	Noise Impacts on Heritage Assets	3.1.8. Therefore, it is not correct that because the noise impacts are below the significance thresholds set out by PPG that they would not have an adverse effect on the setting of heritage assets. The impact of the noise implications of the proposed development to the setting of the heritage asset must be considered separately. This assessment has been provided by Marrons who have concluded that the noise effects of the Scheme would have an impact on the	See response to SLD1-009. Following the meeting with the SLD heritage consultant on the 20 th July, the Applicant understands that SLD has identified a potential impact to the significance of the Grade I Listed Norton Manor (NHLE: 1023215) as a result of noise effect caused by the scheme that would impact the setting of the asset (see Statement of

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			setting of several heritage assets (as discussed in WR Appendix [REP1-171]). This Inspector decision is provided at Appendix E.	Common Ground with Stop Lime Down [REP5-090]. ES Volume 1 Chapter 12: Cultural Heritage [REP3-017] , supported by ES Volume 3 Appendix 12-1 Heritage Statement [APP-219] , identified that there would be no harm to the Grade I Listed Norton Manor (NHLE: 1023215) as a result of the Scheme.
SLD1-012	Noise and Vibration	Article 7	DCO2.6 <i>Article 7 - Defence to proceedings in respect of statutory nuisance</i> <i>ExQ1 DCO1.11 queried whether Article 7 was justified given the statement of the applicant in the Explanatory Memorandum that there is no statutory nuisance expected as a result of the authorised development. The applicant's response [REP3-128]</i>	Please refer to the Applicant's response to DCO2.6 in the Applicant's Response to the Examining Authority's Second Written Questions [REP5-097] .

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<i>stated that Section 158 of the Planning Act 2008 confers statutory authority for the carrying out of development or doing anything else authorised by the Order and that this acts as a defence in any criminal or civil proceedings for nuisance in the absence of any contrary provision in the Order. It added that nuisance from noise is not anticipated from the Scheme, and is not required to be managed through the Requirements. It is therefore very unlikely that the Applicant would need to rely upon the statutory defence conferred by section 158 of the Planning Act.</i> <i>The ExA seeks to understand from the applicant if there are any contradictions between Article 7 and the monitoring and mitigation measures included in Table 8 of the oOEMP [REP4-051], which</i>	

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<i>states that annual noise monitoring will be undertaken and the undertaker and relevant planning authority will then liaise in respect of any further maintenance or mitigation required to reduce levels at receptors back to those presented in the ES. Further, in the case of third-party complaints about noise, correction actions will be taken by the Environment Manager and recorded as outlined in Section 6.2.</i> 3.1.9. SLD agree with this query and have addressed it at para 3.1.88 of this note below.	
SLD1-013	Ecology and Biodiversity Arboriculture	Felling of trees	DCO2.11 Article 40 – Felling or lopping of trees and removal of hedgerows Q2	The Applicant welcomes the confirmation from Stop Lime Down that the power to remove hedgerows is constrained without the addition of “only”. This is consistent with the Applicant's view, as set out in response to DCO2.11 in the Applicant's

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<i>Stop Lime Down has suggested [REP3-173 and REP4-132] that the word 'only' should be inserted after the word 'remove' in Article 40(4), such that it would say: (4) The undertaker may, for the purposes of the authorised development or in connection with the authorised development and subject to paragraph (2), remove only the hedgerows specified in the table in Part 1 and the table in Part 2 of Schedule 12 (hedgerows to be removed) to the extent set out in the ecological protection and mitigation strategy approved pursuant to requirement 8 in Schedule 2 (requirements).</i> <u><i>Stop Lime Down:</i></u> <i>1) Stop Lime Down are requested to explain the necessity for this insertion.</i>	Response to the Examining Authority's Second Written Questions [REP5-097].

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<i>The Applicant and Wiltshire Council: 2) The applicant and Wiltshire Council are invited to comment on the implications (if any) of this suggested insertion.</i> 3.1.10. The intention of proposing "only" was to provide clarity in respect of the scope of the Applicant's power to remove hedgerow. SLD accept that it is not a necessary addition, however as the current language still constrains the Applicant's power to remove hedgerow by reference to compliance with the ecological protection and mitigation strategy	
SLD1-014	Ecology and Biodiversity	Felling of trees	3.1.11. SLD remain concerned in respect of the feasibility of the ECoW having the time, information and means necessary to make informed and effective routing	It is recognised by the Applicant that the EcoCoW will be responsible for effective implementation of construction-phase measures set out within

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
	Arboriculture		decisions, being already under significant external pressures.	the Outline EPMS [REP5-081]. The Applicant maintains that the Ecological Clerk of Works (EcoCoW) will be sufficiently equipped to effectively implement proposed avoidance and mitigation measures within the Cable Route Corridor, and avoid potential adverse impacts to protected and notable species during construction as far as is practicable and in line with the conclusions of the impact assessment presented in ES Volume 1, Chapter 9: Ecology and Biodiversity [REP4-010]. The avoidance and mitigation measures set out within the Outline EPMS [REP5-081] constitute standard industry practice, and potential for delays resulting from the presence of protected species is noted by the Applicant and is a widely recognised risk across construction schemes. The

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				appointed EcoCoW will be suitably qualified and experienced to effectively undertake the work described in the Outline EPMS [REP5-081] and will be supported by a team of ecologists on the Scheme rather than working in isolation. The construction programme will also include flexibility and make allowances for time and resources required for the EcoCoW to effectively undertake their given responsibilities, including to allow for protected species licence applications or implementation of additional avoidance measures, if necessary.
SLD1-015	Ecology and Biodiversity	Felling of trees	3.1.12. Likewise, SLD remain concerned that a much higher amount of hedgerow may be lost than initially indicated – and the controls in place to manage this. That might extend to securing a reasonable worst case within the	The Applicant notes this comment. Please refer to the Applicant's response to DCO2.10 in the Applicant's Response to the Examining Authority's Second Written Questions [REP5-097] which sets out how

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			DCO for the amount of hedgerow lost.	the provisions of the Draft DCO [REP5-012] and the management plans operate to control the extent of hedgerow removal to that assessed through the Rochdale Envelope approach.
SLD1-016	Construction and Decommissioning	Requirement 20- Decommissioning and Restoration	DCO2.17 Requirement 20 - Decommissioning and restoration Q1 <i>Notwithstanding Requirement 20(7) requiring the undertaker to notify the relevant planning authority within 28 days of any part of the authorised development permanently ceasing to be in commercial use, there is no legally enforceable requirement for that part (or parts) to be decommissioned and the land restored once it ceases to be used</i>	Please refer to the Applicant's response to DCO2.17 and DCO2.18 in the Applicant's Response to the Examining Authority's Second Written Questions [REP5-097] . The date of decommissioning is inherently tied to the cessation of commercial use of the relevant part of the Authorised Development, ensuring that the infrastructure is decommissioned and not left in a non-functioning state. The Applicant is confident that a failure to decommission would be a breach of Requirement 20 and therefore

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<i>for the purposes of electricity generation for commercial use. Rather, Requirement 20(1)(a) as currently drafted, links decommissioning to a 60-year time period after the initial date of final commissioning, rather than the point at which any relevant part ceases to be used for electricity generation for commercial use (which may be much earlier than 60 years). Please provide alternative drafting that would ensure that there is a legally enforceable requirement for the proposed development, or relevant part of it, to be decommissioned and the land restored following all or any part of the Order land ceasing to be used for the purposes of electricity generation for commercial use at any time, or explain why this is not reasonable/necessary. For the avoidance of doubt, the ExA is seeking to avoid a situation where an option</i>	enforceable under Part 8 of the Planning Act 2008.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<i>agreement on one part of the site expires after 40 years yet the infrastructure remains non-functional on the land for a further 20 years before decommissioning commences.</i> 3.1.13. SLD note this question and agree that this issue is required to be managed as (inter alia) it is not clear that Part 8 PA 2008 powers could be used in such a situation. In addition, SLD consider that this issue again draws into sharp relief the problems caused by a situation where piecemeal decommissioning is likely. Any answer to this question cannot resolve the broader issue that SLD has flagged elsewhere (e.g. at para 16.3.2 of [REP1-167] and para 2.1.3 of [REP2-051]) that such piecemeal decommissioning may lead to a version of the scheme likely to	

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			cause more significant adverse effects than that assessed	
SLD1-017	Construction and Decommissioning	Requirement 20- Decommissioning and Restoration	DCO2.19 Requirement 20 - Decommissioning and restoration Q3 <i>Wiltshire Council [REP4-092] suggests that Requirement 20 should include the requirement for a decommissioning phasing timetable and plan to be submitted to and approved by the planning authority, rather than just submitted to it. This would necessitate a revision to paragraphs (2), (3) and/ or (4).</i> <i>The Council also suggests that a new paragraph should be included in the Requirement indicating that the decommissioning report and certificate of completion should be</i>	Please refer to the Applicant's response to DCO2.19 in the Applicant's Response to the Examining Authority's Second Written Questions [REP5-097] which confirms that a timetable for decommissioning is already secured by, and must be approved under, Requirement 20.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<i>submitted to the local planning authority for approval. The ExA considers that there is merit in these suggestions and therefore requests the applicant's consideration of them, and a justification if it does not wish to take the insertions forward.</i> 3.1.14. SLD agree with the suggestion and also note that this provision would require approval of the timetable and plan. SLD note that such approval is not currently included in Schedule 2, Requirement 2(2) for a construction phasing plan and SLD (for the reasons explained again below in para 3.1.99) consider that approval for that phasing plan should be provided for also.	
SLD1-018	Ecology and Biodiversity	Brown Hares	EV2.6	The Applicant notes this comment and has responded to

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			Brown hare <i>In Stop Lime Down's WR Appendix E paragraph 39 [REP1-173] you state that brown hare enjoys open fields, but the applicant provides no mitigation, so you question the potential impact on brown hares. In the applicant's response to ExQ1 EB1.12 [REP3-128], it comments that the security fencing is large enough to allow the passage of brown hare. You are asked to consider if this resolves your concerns and if not, what further mitigation would you expect to avoid impact on brown hare. If your position is that there is no possible mitigation, then please provide an explanation.</i> 3.1.15. SLD's primary concern in relation to hare relates to the harms by exclusion from fields and	the relevant points in responses to SLD1-019 to SLD1-026 below.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			higher roadkill mortality due to inappropriate boundary fencing specifications as the main concern to hare for a development of this scale.	
SLD1-019	Ecology and Biodiversity	Brown Hares	The lack of detail during the early stages of the enquiry about exact mesh width and absence of precautionary gaps/wildlife gates along sections where fencing was present for long stretches at either side of a road left open a potential for significant long-term ecological impacts at the local scale for hares and several other medium-large terrestrial species	The Applicant notes this comment and confirms that additional specifications for fencing have been provided within the Outline EPMS [REP5-081] . The Applicant maintains that no significant residual adverse on terrestrial mammals is anticipated as a result of fencing installation at the Solar PV Sites, as set out within ES Volume 1, Chapter 9: Ecology and Biodiversity [REP4-010] .
SLD1-020	Ecology and Biodiversity	Brown Hares	3.1.16. As of June 2026, the Applicant has amended the Outline Ecological Protection and Mitigation Strategy to include additional controls by the EcoCoW to ensure minimum 100mm gaps are present along the base of all	The Applicant welcomes Stop Lime Down's comment.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			Solar PV fencing, whether through natural gaps in the ground or by intentionally raising sections of fencing ([REP4- 052] at para 3.5.5). SLD very much welcome the inclusion of these measures.	
SLD1-021	Ecology and Biodiversity	Brown Hares	However, wider gaps will be required, as 100mm may still represent a deterrent for larger, non-burrowing mammals, including hare, especially in the period shortly after installation or routine repairs where incidental, larger gaps from badger and rabbit will not have formed yet. Along roadsides, given the scale of the development these fencelines can be an extensive obstacle funnelling larger fauna along roadsides, even when accounting for deer exclusion requirements.	The Applicant notes this comment and maintains that the specified fencing will be permeable to hare and other terrestrial mammals (excluding deer) from the point of installation, as set out in the Applicant's Response to the Examining Authority's First Written Questions [REP3-128] , namely question EB1.12. Extensive monitoring of active solar farms has confirmed regular incidental presence of brown hare within solar arrays including on sites where standard mesh wire fencing, as specified for the Scheme, is present. These data are presented in Solar Habitat, a yearly

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				publication since 2023 by Solar Energy UK in collaboration with Lancaster University, Wychwood Biodiversity, and Clarkson and Woods.
SLD1-022	Ecology and Biodiversity	Brown Hares	3.1.17. In SLD's opinion, gaps proposed along the base of the deer fencing should be no less than 200mm, both in width and height; this would be closer in line with standard specifications used in commercial hedgehog gates (~ 150 x 150 mm) and badger gates (200/300 x 200/300 mm).	The Applicant notes this comment and maintains that proposed minimum 100m gaps will allow sufficient movement of terrestrial mammals, including adult brown hare and hedgehog (but excluding deer) while maintaining security requirements for fencing at the Solar PV Sites.
SLD1-023	Ecology and Biodiversity	Brown Hares	Where fencing cannot be raised sufficiently high to allow for these specifications, and natural undulations are insufficient, these can be created by cutting square gaps into the base of the mesh, excavating holes below the fenceline beforehand or, in more extreme cases, installing a badger gate or similar. These larger gaps	The Applicant notes this comment and maintains the position outlined in relevant responses SLD1-019 to SLD1-022 above.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			should be primarily concentrated along roadside sections. With this increase in size, and provided these gaps are implemented across the various solar PV field perimeters, SLD feel this measure would successfully mitigate potential impacts on hare and other medium-large terrestrial mammals.	
SLD1-024	Ecology and Biodiversity	Brown Hares	3.1.18. While the presently suggested 100mm raised gap will not entirely preclude access into the fields, particularly to burrowing mammals such as badger or rabbit, too small a gap may still act as a deterrent, particularly to terrestrial mammals such as otter, hedgehog and hare. While individuals, such as juveniles, may still squeeze through even smaller gaps, initial reactions will often be to follow the fenceline searching for a wider opening.	The Applicant notes this comment and maintains the position outlined in relevant responses SLD1-019 to SLD1-022 above. Furthermore, the proposed 100 mm gap represents a minimum clearance beneath the fence and is not intended to function as a fixed or uniform opening along its entire length. In practice, natural undulations in ground levels across the Solar PV Sites will result in numerous locations where the clearance beneath the fence exceeds 100 mm, thereby

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				providing additional opportunities for the movement of terrestrial mammal, notwithstanding the fact that, in the Applicant's view, 100mm is sufficient to allow the passage of terrestrial mammals. The 100 mm minimum gap has been specified to balance the need to maintain ecological connectivity with the operational and security requirements of the Scheme.
SLD1-025	Ecology and Biodiversity	Brown Hares	When fencing abuts roadside sections, this can create unintentional funnels with increased potential risk of mortality, particularly following initial installation or routine repairs of a section of fencing. For this reason, SLD's advisors advise this slight widening of the proposed gaps to be more in line with common practice.	As stated in the above relevant responses to SLD1-019 to SLD1-022, the Applicant maintains that perimeter fencing at the Solar PV Sites will not preclude the movement of brown hare within the Order Limits and will therefore not result in significant adverse effects on the species, as set out within ES Volume 1, Chapter 9: Ecology and Biodiversity [REP4-010] ,

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				including through potential increases in road mortality.
SLD1-026	Ecology and Biodiversity	Brown Hares	3.1.19. SLD's expert would still advise carrying out a more comprehensive hare population assessment prior to any works commencing as a matter of ecological best practice, considering the frequent lack of these important baseline data for such developments and to inform eventual longterm monitoring efforts, should the proposal proceed. This being said, additional surveys should be prioritized for species that were not surveyed at the initial impact assessment stage which are at higher risk of direct and indirect impacts than hare (e.g. dormouse, white-clawed crayfish).	The Applicant notes this comment. The Applicant does not intend to undertake population assessment surveys for brown hare; presence of the species has been incidentally confirmed within the Order Limits and extensive suitable habitat exists. The proposed mitigation measures set out within the Outline EPMS [REP5-081] are considered to be sufficiently precautionary to avoid potential adverse impacts on brown hare during construction, and proposed fence gaps are considered suitable to ensure brown hare are able to utilise the Solar PV Sites throughout the operational phase. The Applicant does not consider that completion of population assessment surveys for brown hare would materially affect the

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				conclusion of no significant adverse effects on the species, as set out within ES Volume 1, Chapter 9: Ecology and Biodiversity [REP4-010] . Brown hares are known to frequently be found using ground-mounted solar farms, as shown in data presented in Solar Habitat, a yearly publication since 2023 by Solar Energy UK in collaboration with Lancaster University, Wychwood Biodiversity, and Clarkson and Woods. Although research evidence is limited, it is speculated that solar farms typically provide optimal habitat for brown hares in the form of abundant foraging and sheltering features in the form of extensive grassland and panels respectively.
SLD1-027	Hydrology, Flood Risk and Drainage	Hydraulic Modelling	FHW2.3 Flood Risk Assessment – Hydraulic Modelling	The Applicant notes SLD's position but does not agree that the evidence presented provides a basis for extending Flood Zone

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<i>The EA, in its hearing submission [REP4-097], explains that for Lime Down D modelling there are unresolved issues regarding the data used and missing information and requests further information from the applicant. The applicant submitted at deadline 4 the hydraulic modelling report for Lime Down E2 [REP4-089].</i> <u><i>The Environment Agency:</i></u> <i>1) Can the EA confirm if all the required further information for Lime Down D modelling has been submitted?</i> <i>2) Can the EA please provide an update of the review of the</i>	3b beyond the functional floodplain identified by the updated hydraulic modelling. The Lime Down D - Hydraulic Modelling Report [REP5-095] includes the 3.33% AEP event specifically to inform consideration of the functional floodplain. The resulting extent should be considered spatially, based on the modelled area in which floodwater is expected to flow or be stored, rather than by applying Flood Zone 3b to whole field parcels. The implications of the 3.33% AEP modelling for Flood Zone 3b, the Sequential and Exception Tests and the Ordinary Watercourse between Fields D22 and D1 are addressed in FHW2.3a to FHW2.3c. The Applicant does not consider that SLD's submission changes those conclusions.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<i>hydraulic modelling for Lime Down E2 at deadline 5</i> <i>confirming if further information is required and highlighting any significant issues found?</i> <i>The LLFA:</i> <i>3) Considering the EA response to ExQ1 FWM1.4 (2) [REP3-146], the outputs from the applicant's Gauze Brook and Rodbourne Brook modelling which include the 3.33% AEP scenario and the evidence presented by the Stop Lime Down report [REP1-176], does this information support an extension to Flood Zone 3b in Lime Down D? If so, to which fields?</i> <i>4) If your response to question 3 is positive, please explain any potential impact on the sequential and exception tests results.</i>	

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<u>The LLFA:</u> <i>In your response to ExQ1 FHW1.12 [REP3-142] in relation to an ordinary watercourse running between the fields D22 and D1 you requested the applicant to:</i> <i>• Undertake targeted topographic and channel survey of the watercourse corridor.</i> <i>• Provide proportionate hydraulic assessment (or equivalent evidence) to define flood extents, depths, and flow routes.</i> <i>• Demonstrate that the layout maintains conveyance, including appropriate stand-offs and no obstruction of flow paths.</i> <i>• Confirm how the watercourse will be protected and managed.</i>	

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			• Address any consenting requirements for works affecting an ordinary watercourse. 5) Considering the modelling provided for Lime Down D and its review by the EA, is your response to ExQ1 FHW1.12 still relevant or do you consider that the available information and the applicant's existing commitments will suffice? 3.1.20. Stop Lime Down considers that there is a case for extending the Flood Zone 3b around the Gauze Brook upstream of Corston as explained in [REP1-176].	
SLD1-028	Hydrology, Flood Risk and Drainage	Hydraulic Modelling	Though Flood Zone 3b is defined by modelling and its extent will depend on the assumptions made, it is clear that the Applicant's latest modelling (ES Appendix 11-6: Flood Risk Assessment and Outline Drainage Strategy – Lime	The Applicant does not agree that the Storm Bert observations demonstrate that the 1% AEP modelled flood extent is underestimated or provide a basis for treating the whole of

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			Down D Rev 4 [REP4-032], Annex B) underestimates the flood extent observed during Storm Bert. Storm Bert was an approximately 1 % AEP event, and the flood extent should correspond to the appropriate figure in Annex B, but the flood extent is clearly underestimated there. There is thus a case for including the whole of Fields D13 and D14 as "Functional Floodplain" which would correspond well with the historical flood extent shown in ES Appendix 11-6: Flood Risk Assessment and Outline Drainage Strategy – Lime Down D Rev 4 [REP4-032], Figure 6.	Fields D13 and D14 as functional floodplain. As addressed in SLD-113, characterising Storm Bert as approximately a 1% AEP rainfall event does not establish that Gauze Brook experienced the modelled 1% AEP fluvial flow at Lime Down D. The photographs also represent conditions at a particular time during the event and do not provide surveyed flood levels or a complete flood boundary from which a design-event extent can be derived. The Lime Down D - Hydraulic Modelling Report [REP5-095] includes the 3.33% AEP event specifically to inform consideration of the functional floodplain. Flood Zone 3b should therefore be defined by the modelled areas in which water flows or is stored during that event, rather than by applying the

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				designation to whole field parcels because historic flooding has occurred within part of them. The Applicant therefore does not consider there is an evidential basis for designating the entirety of Fields D13 and D14 as functional floodplain. The implications of the updated modelling for Flood Zone 3b are addressed further in FHW2.3a.
SLD1-029	Hydrology, Flood Risk and Drainage	Freeboard Allowance	FHW2.4 Flood Risk Assessment – Freeboard Allowance <i>The applicant explained in its response to ExQ1 FHW1.5 [REP3-128] that the “Manning calculations (...) were used to compare the assessed 1% AEP plus climate change levels with the conservative 0.1% AEP surface water mapping used for context, to understand local drainage pathways and to inform the micro-siting of</i>	The applicant notes and welcomes this comment.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<i>infrastructure. (...) Manning calculations did not identify locations where the smaller ordinary watercourses or land drainage features would give rise to a significant flood risk to the Scheme, or where the Scheme would be likely to increase off-site flood risk through displacement of floodwater or interruption of existing flow routes. They also informed the micro-siting of infrastructure by helping to identify local flood flow pathways, indicative flood levels and areas where infrastructure should be avoided or managed through embedded mitigation. They were not intended to be a full dynamic hydraulic model of the catchments. The EA in its response to [REP3-146] agreed that the Manning Calculations had limitations but were useful to contextualise the 0.1% AEP extent of the Risk of Flooding from Surface Water</i>	

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<i>(RoFSW) mapping. RoFSW mapping was used by the applicant as a proxy to understand fluvial flood risk from smaller ordinary watercourses due to the lack of information available. The EA considered that the assessment was proportionate. To address any uncertainty arising from the assessment the EA requested from the applicant a commitment to ensure 0.6m freeboard above the design flood event for any solar PV panels placed in areas of flood risk.</i> <u>The LLFA:</u> <i>1) Considering your response to ExQ1 FHW1.5 [REP3-142] and the EA conclusions, can you please confirm agreement or otherwise with the EA conclusions regarding the Manning calculations and freeboard allowance commitment?</i>	

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<i>The Applicant: The applicant confirmed in [REP3-128] that “(...) sensitive electrical infrastructure within areas of modelled flood interaction will either be located outside the design flood extent or raised with a minimum 0.6 m freeboard above the design flood level, including climate change. For Solar PV Panels, sensitive electrical equipment mounted on the panels will also be set no less than 0.6 m above the design flood level, including climate change. The lowest leading edge of the panel itself is not sensitive electrical equipment and may sit lower, depending on the final fixed or tracker arrangement.”</i> <i>The EA required further clarity from the applicant regarding the freeboard applied to the lowest leading edge of the solar PV</i>	

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<i>panels above the design flood level to ensure operability during a flood event for both Lime Down D and Lime Down E2 [REP4-097].</i> <i>2) Can the applicant provide the clarity requested by the EA? Please also consider the design parameters and any potential Landscape and Visual impacts in your response.</i> <u><i>Stop Lime Down:</i></u> <i>3) Given your post hearing submission [REP4-132] please provide concise comments on the issues discussed above.</i> 3.1.21. SLD notes that the EA agreed the Mannings calculations were unrealistic, but justified using the EA's Risk of Surface Water Flooding (RoSWF) maps as a	

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			proxy for fluvial flood risk, rather than a direct model of water flows. Improved explanations of the Manning's calculations from both the Applicant and the EA were provided.	
SLD1-030	Hydrology, Flood Risk and Drainage	Freeboard Allowance	SLD continues to maintain that (a) before using model results for such assessments, they should be producing more credible results; (b) the Applicant has still not explained why the Manning's assessments in the FRA's show the 0.1% AEP results when the description in the text states the assessment is based on the 1% AEP event and (c) how the modelling translates into an overall assessment of "negligible to low". Paras 4.1.21 to 4.1.24 of [REP4-132] still apply.	The Applicant notes that SLD maintains its position. The matters raised have been addressed through the Applicant's responses to ExQ1 FHW1.5 and FHW2.4. The Manning calculations were not intended to provide detailed hydraulic modelling. They were used as a proportionate screening and sensitivity exercise for smaller Ordinary Watercourses and drainage features, with the conservative 0.1% AEP RoFSW mapping providing the wider flood extent and water-level context. The Environment Agency and LLFA have both accepted that this is a

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				proportionate approach for those features. Detailed hydraulic modelling has separately been undertaken where the nature of the floodplain interaction warrants it. For clarity, the references to the 0.1% AEP event within the Manning calculation outputs identify the EA RoFSW mapped water level used as the conservative reference condition. They do not mean that the Scheme's design flood assessment is based on the 0.1% AEP event. The design assessment considers the 1% AEP event including the applicable climate change allowance, with the Manning calculations used to understand the sensitivity of indicative water levels relative to the conservative mapped extent.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				The conclusion of Negligible to Low flood risk is also not derived from the Manning calculations in isolation. It reflects the overall FRA assessment of flood sources, the location and vulnerability of infrastructure, existing and proposed drainage pathways and the embedded mitigation and resilience measures. The Applicant therefore does not agree that the matters raised by SLD alter the conclusions of the FRA.
SLD1-032	Hydrology, Flood Risk and Drainage	Freeboard Allowance	3.1.22. Professor Skeffington agrees however that the RoFSW maps are a reasonable and proportionate proxy for flood risk in those areas missing more relevant information, with the caveat that the new maps appear to underestimate surface water flooding in the area. The Mannings calculations do not make Professor	The Applicant welcomes SLD's agreement that the RoFSW mapping provides a reasonable and proportionate proxy for flood risk where more detailed information is not available. The proportionality of the approach has also been accepted by the Environment Agency and LLFA and is addressed in FHW2.4. No further

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			Skeffington any more or less satisfied about this.	response is considered necessary.
SLD1-033	Hydrology, Flood Risk and Drainage	Freeboard Allowance	3.1.23. On the Freeboard Allowance, Professor Skeffington discussed SLD's concerns expressed in Section 4.1.18 of [REP-132] in a meeting with the Applicant and consultants Arthian on 22 June 2026. The Applicant also addressed the matter to some extent in their Response to Submissions Received at Deadline 3 [REP4-082] SLD-032.	The Applicant notes SLD's record of the discussion held with the Applicant and Arthian on 22 June 2026. The final freeboard position is confirmed in SLD1-034.
SLD1-034	Hydrology, Flood Risk and Drainage	Freeboard Allowance	Professor Skeffington's understanding was that the Applicant is prepared to commit to an absolute maximum height of 4.5 m above existing ground level for the tracking panels and 3.5 m above existing ground level for the fixed panels; that where the panel installations are elevated to provide the required 0.6 m freeboard in flood zone areas, this will be achieved by limiting the maximum	The Applicant confirms that the maximum Solar PV Panel heights remain 4.5 m above existing ground level for tracking panels and 3.5 m for fixed panels. Where Solar PV Panels are located within the design flood extent, the lowest leading edge will be positioned no less than 0.6 m above the applicable design flood level including

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			tilt of the tracking panels and the angle of the fixed panels; and that "micro-siting" means moving installations around on the existing ground surface rather than constructing elevated platforms in the flood plain areas. This ought to prevent the panels being more visually intrusive in the flood plain areas and the lower edge of the panels acting as a water flow barrier in flood situations. If the Applicant were to commit to this then SLD's concerns would be resolved.	climate change. Avoidance through micro-siting remains the preferred approach. Where necessary, panel height, tilt or tracker operating range may be adjusted through detailed design to achieve the required freeboard while remaining within the maximum design parameters. Where this cannot be achieved, Solar PV Panels will not be located in that area. The Applicant also confirms that micro-siting means local adjustment of panel positions on the existing ground surface. It does not involve construction of raised platforms or localised land raising within the floodplain. The Applicant therefore considers that the commitments sought by SLD are provided and notes SLD's confirmation that these measures would resolve its concerns.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
SLD1-035	Construction and Decommissioning	Water Management Plan	FHW2.8 Construction – Water Management Plan <i>The applicant in its rebuttal to Wiltshire Council's response to ExQ1 FHW1.9 [REP4-081] indicates that "The Water Management Plan forming part of the detailed CEMP will provide the phase-specific construction drainage and exceedance arrangements. It will identify:</i> <i>• the existing drainage features and overland flow routes relevant to the construction phase;</i> <i>• the proposed temporary drainage and runoff controls; • the routing of flows exceeding the capacity of temporary drainage measures;</i>	The Applicant does not agree that the absence of a separate standalone Water Management Plan at this stage represents a gap in the Scheme's environmental management framework. As addressed in FHW2.8a to FHW2.8c, water management is appropriately developed through the detailed management plan applicable to each phase because the activities, risks and controls differ materially between construction, operation and decommissioning. The Deadline 5 Outline CEMP [REP5-071], Outline OEMP [REP5-073] and Outline Decommissioning Strategy [REP5-075] have been updated to include dedicated sections explaining the relevant phase-specific water management

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			• <i>the interaction with compounds, haul routes, stockpiles, excavations and watercourse crossings; and</i> • <i>the measures required to maintain existing floodplain capacity and avoid diversion of flows towards sensitive receptors.”</i> <i>Some of the issues mentioned in the bullet points above are not included in the latest oCEMP [REP4-049].</i> <u><i>All parties:</i></u> <i>1) Given that the WMP is going to be an important management plan for the duration of this project (and also referred to in the oOEMP and the outline Decommissioning Strategy (oDS)) is it still adequate that it is approved through these documents, rather than being a standalone certified document?</i>	arrangements and their relationship with the wider environmental controls.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			2) If so, should it not have more overt relevance within the oCEMP, oOEMP and the oDS, possibly through the addition of a standalone section which explains its purpose, contents and links with other management plans, instead of being embedded in Table 5 of the outline management plans? 3) If a separate WMP that covers the lifetime of the development is the best way forward, please give reasons why. Please also include information regarding the approval mechanism and consultees. 4) As water management will be key for other topics such as soil and ecology, should it also be referenced in the oSRMP, oEPMS and other outline management plans/strategies? If so, please set out which ones and the reasons why	

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			3.1.24. Stop Lime Down agrees with the ExA's implication that, given the importance of the Water Management Plan not only during the construction phase but throughout the lifetime of the project, it is not acceptable that it does not currently exist.	
SLD1-036	Construction and Decommissioning	Water Management Plan	Embedding disconnected sections in the other outline management plans prevents regulatory bodies from seeing water problems as a whole and risks missing significant interactions with soils, ecology, construction techniques, maintenance and decommissioning. Enforcing a requirement for the other plans to adhere to the WMP, and setting out the principles of water management would ensure that water issues are not lost within the detail of the other plans, possibly not understood by specialists without expertise in those areas.	The Applicant does not agree that a separate lifetime Water Management Plan would provide a clearer or more effective management framework. The phase-specific approach avoids duplicating controls and allows the detailed water management measures to respond to the activities, design and site conditions relevant to construction, operation and decommissioning. The dedicated water management sections within the relevant outline plans, together with cross-references from the Outline SRMP [REP5-

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			These outline plans could then reference the WMP.	077] and Outline EPMS [REP5-081], provide the integration sought by SLD. The relationship between the measures, monitoring requirements and securing mechanisms is also consolidated through the Mitigation Route Map [REP5-102]. The Applicant therefore considers that water-related interactions are clearly identified without creating an additional overlapping management plan.
SLD1-037	Construction and Decommissioning	Water Management Plan	3.1.25. The approval mechanism should be the same as the other plans, consultees should clearly include water-related organisations such as the EA and LLFA, and the sewage operator (Wessex Water). Wiltshire Council should be a consultee to allow its ecology and transport functions access, and Natural England for ecological aspects.	The Applicant does not consider that a separate approval mechanism or additional blanket list of consultees is required. The phase-specific water management provisions will be approved through the existing DCO Requirements for the detailed CEMP, OEMP and Decommissioning Strategy. Consultation will occur in

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				accordance with those Requirements and the applicable statutory or regulatory regime, including with the relevant drainage or environmental authority where its functions are engaged. The Applicant does not consider it appropriate to prescribe consultation with every organisation identified by SLD for all water management matters irrespective of the activity or receptor concerned.
SLD1-038	Description and DCO Process	Re-powering	GCT2.4 Re-powering <i>Regarding the current policy direction of travel and the need for renewables going forward, on what basis should the ExA consider the proposed development to be 'temporary'?</i>	The Applicant notes this comment. Please see reference GCT2.4 in the Applicant's Response to the Examining Authority's Second Written Questions [REP5-097].

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<i>Whilst there is a decommissioning date (60 years) written into Requirement 20 of the dDCO, what is to stop the proposed development being re-powered? In such circumstances, would not the label of 'temporary' be misplaced in all ES assessments?</i> 3.1.26. SLD notes this question and addressed it in its planning submission at Section 5 [REP1-169].	
SLD1-039	Human Health	Mental Wellbeing	HW2.1 Mental Wellbeing <i>Stop Lime Down, in its comments on the applicant's responses to ExQ1 HW1.1 and HW1.3 [REP4-132], expressed concern that the applicant had not adequately</i>	The Applicant notes this comment and has responded to the points raised in the below. The Applicant confirms that discussions with Wiltshire Council regarding the Terms of Reference (ToR) for both the Community Liaison Group (CLG) and the wider communication strategy are active and ongoing. In fulfilment of this, the Applicant

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<i>addressed the potential mental health impacts associated with the proposed development. It requested further information on a communications strategy demonstrating how the recommendations contained within Suffolk County Council's Energy and Climate Adaptive Infrastructure Policy: Community Engagement and Wellbeing Supplementary Guidance Document (SGD) have been considered and incorporated into the applicant's approach.</i> <i>The ExA acknowledges the sensitivity of this matter and recognises the efforts made by the applicant to engage with mental health providers within and around the Order limits to mitigate potential mental health impacts. Nevertheless, the ExA considers that the SGD contains guidance of relevance to the post-consent phase and that its</i>	provided an example ToR to the Council on 4 August 2026 to serve as a baseline for further refinement, with a list of draft additions to the ToR set out based on the discussions and representations made to date.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<i>recommendations could usefully inform the development of a clear and structured communications strategy. This may have implications for the applicant's response to ExQ SE2.9, particularly in relation to the proposed role and function of the Community Liaison Group (CLG).</i> <u><i>Wiltshire Council and Stop Lime Down:</i></u> <i>In its response to ExQ1 HW1.1, the applicant questioned the appropriateness of relying on the SGD on the basis that it is not specifically directed at the post-consent stage. The applicant requested that Wiltshire Council identify those elements of the SGD it considers most relevant to the development of a communications strategy.</i>	

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			1) <i>Wiltshire Council and Stop Lime Down are therefore invited to identify the specific recommendations or principles within the SGD that they consider applicable to the post-consent phase and explain how these should be reflected within a communications strategy for Lime Down. Responses should also clarify their expectations regarding the purpose, scope and delivery of that strategy.</i> <u><i>The Applicant, Wiltshire Council and Stop Lime Down:</i></u> <i>Having regard to Stop Lime Down's deadline 4 submission [REP4-132], the ExA invites comments on how a communications strategy informed by the SGD could be secured, implemented and monitored. In particular: 2) Should responsibility for overseeing or supporting delivery of the</i>	

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<i>communications strategy form part of the CLG's role? If so, how could this be achieved in practice?</i> <i>3) How might such arrangements avoid placing additional burdens on volunteer representatives and Parish Councils?</i> <i>4) What mechanisms, if any, would be appropriate to secure implementation and monitoring of the strategy throughout the post-consent phase? In responding, parties should also have regard to ExQ2 SE2.9. Wiltshire Council and Stop Lime Down are welcome to provide comments on that question where relevant.</i> Question 1 3.1.27. Having regard to the Suffolk SGD, it is felt that the following principles are the most relevant:	

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
SLD1-040	Human Health	Mental Wellbeing	Extended community engagement: Providing communities with active, responsive communication channels so that emerging wellbeing risks can be flagged, recorded, and addressed without delay	The Applicant confirms that this would be established through the CLG itself, and through the engagement pursuant to the Stakeholder Communication Plan secured via section 2.15 of the Outline CEMP [REP5-071] by Requirement 13 of Schedule 2 of Schedule 2 to the Draft DCO [REP5-012] .
SLD1-041	Human Health	Mental Wellbeing	Safeguarding well-being: Regular reviews to ensure physical mitigation measures (such as noise barriers, dust control, and traffic routing) are successfully preventing the degradation of local living conditions. Promoters are also expected to look at community feedback through structured wellbeing lenses—such as the emotional needs frameworks highlighted by Suffolk Mind.	The Applicant confirms that monitoring of physical mitigation measures and mitigation procedures is secured through sections 3 and 6.1 of the Outline CEMP [REP5-071] and in section 6.14 of the Outline CTMP [REP5-083] by Requirements 13 and 15 respectively of Schedule 2 to the Draft DCO [REP5-012] . Community feedback will be collated by the Community Liaison Manager whose responsibility will be to ensure

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				that any issues or concerns are effectively addressed. This will be undertaken through a health and wellbeing lens with the CLG being able to provide signposting to mental health and wellbeing support services if required by community respondents.
SLD1-042	Human Health	Mental Wellbeing	Procedural fairness: Suffolk County Council's guidance emphasizes maintaining an auditable trail, utilizing "You Said, We Did" reports, and tracking engagement with "seldom-heard" groups. This guidance emphasizes accountability and transparency, which SLD agrees is important.	In respect of Suffolk County Council's guidance, the Applicant refers SLD to its response to HW2.1 in the Applicant's Response to the Examining Authority's Second Written Questions [REP5-097]. The Applicant has responded to Wiltshire Council's recommendations at 'HW2.1a' in Table 2-1 above. The Applicant confirms that discussions in relation to the provision and operation of the CLG are ongoing, with all updates recorded through the Statement

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				of Common Ground with Wiltshire Council [REP5-087].
SLD1-043	Human Health	Mental Wellbeing	3.1.28. A number of recommendations within the SGD were noted within SLD's Deadline 4 Submission [REP4-132]. Those relevant to the post-consent phase include:	The Applicant has responses to SLD's submissions at Section 4.5 and 4.6 of the Applicant's Response to Submissions Received at Deadline 4 [REP5-098] .
SLD1-044	Human Health	Mental Wellbeing	To establish a panel made up of a group of engaged individuals, who have the confidence of the communities they represent, and who can engage and work with the promoter, without prejudice to any objections they may have to the scheme	The Applicant has responded to Wiltshire Council's recommendations for the provision of the CLG at 'HW2.1a' in Table 2-1 above. The Applicant confirms that discussions in relation to the provision and operation of the CLG are ongoing, with all updates recorded through the Statement of Common Ground with Wiltshire Council [REP5-087] . The Applicant proposes to use the Lime Down project website to invite engaged individuals who wish to be members of the CLG to register their interest during

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				the decision-making phase of the DCO application (following the close of examination).
SLD1-045	Human Health	Mental Wellbeing	Delivering information regarding the infrastructure programmes to community leaders, supported by face-to-face conversations to ensure that community leaders can ask questions, and get responses, in a timely manner.	The Applicant confirms that the provision of Scheme information would be delivered through the Stakeholder Communication Plan secured via section 2.15 of the Outline CEMP [REP5-071] by Requirement 13 of Schedule 2 of Schedule 2 to the Draft DCO [REP5-012] . The CLG would then act as the contact point for which community feedback can be collated, considered, and where appropriate taken away by the Community Liaison Manager to action.
SLD1-046	Human Health	Mental Wellbeing	Consideration should be given to the funding of local mental health organisations, to enable them to mentor those who volunteer to undertake wellbeing support roles. This would ensure that volunteers receive appropriate training,	The Applicant has responded to Wiltshire Council's recommendations for the provision of the CLG at 'HW2.1a' in Table 2-1 above. The Applicant confirms that discussions in relation to the

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			support, and guidance, and would also reduce the feelings of isolation and overwhelm often described by community leaders in these roles.	provision and operation of the CLG are ongoing, with all updates recorded through the Statement of Common Ground with Wiltshire Council [REP5-087]. The Applicant confirms that signposting to mental health providers will be provided through the CLG. Funding for volunteer mental health first aid training or service providers could be supported through application to the Community Benefit Fund. A decision on funding provision would be made by an independent fund administrator, not the Applicant or Wiltshire Council.
SLD1-047	Human Health	Mental Wellbeing	Project promoters should invest in the development of community assets, as mitigation and enhancement. The identification of relevant assets should be	The Applicant confirms that the provision of a Community Benefit Fund is committed to separately to the DCO process. This provides a potential opportunity

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			undertaken in close collaboration with the community, and may include for example, proactively investing in supporting local community events, the enhancement of community buildings such as village halls or places of worship, or public spaces and community organisations, so supporting communities to continue to foster a sense of pride, allyship and belonging.	for the Scheme to help contribute towards funding for new or enhanced community infrastructure across the areas affected by the Scheme. Parish councils, community groups, and event organisers would be able to apply for said funding to support their own fundraising efforts. A decision on funding provision would be made by an independent fund administrator, not the Applicant or Wiltshire Council. This is standard practice for delivery of community funding for infrastructure projects.
SLD1-048	Human Health	Mental Wellbeing	Question 2 3.1.29. SLD understand that a commitment has been given by the Applicant to Wiltshire Council to provide a draft Terms of Reference to the CLG at the earliest opportunity to maximise benefit and engagement with community groups. SLD would welcome this	The Applicant confirms that discussions with Wiltshire Council regarding the Terms of Reference (ToR) for both the Community Liaison Group (CLG) and the wider communication strategy are active and ongoing. In fulfilment of this, the Applicant provided an example ToR to the Council on 4 August 2026 to

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			approach, as it is very important that the local community has input with any such strategy	serve as a baseline for further refinement, with a list of draft additions to the ToR set out based on the discussions and representations made to date.
SLD1-049	Human Health	Mental Wellbeing	3.1.30. SLD expects such a strategy will consider how updates to the local community will be given. Ideally the Applicant will manage a website with updates on traffic movements, road closures, interactive maps, construction updates, schedules of maintenance. The website could also give regular updates on noise assessments, dust assessments and environmental assessments.	The Applicant confirms that the provision of Scheme information would be delivered through the Stakeholder Communication Plan secured via section 2.15 of the Outline CEMP [REP5-071] by Requirement 13 of Schedule 2 of Schedule 2 to the Draft DCO [REP5-012]. The Applicant has confirmed with Wiltshire Council that it will upload all applications for the discharge of Requirements to its website where they can be viewed by stakeholders. The Applicant will consider how the project website can be continued to use for detailed project updates through agreement with Wiltshire Council

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				on the monitoring requirements pursuant to each of the relevant management plans secured by the Requirements in Schedule 2 of the Draft DCO [REP5-012] .
SLD1-050	Human Health	Mental Wellbeing	3.1.31. It is also important that the CLG continue to have a role after the construction phase. That will be particularly so at key points in the operational phase, and in the decommissioning phase (as is provided).	The Applicant refers to their response to question SE2.9 in The Applicant's Response to the Examining Authority's Second Written Questions [REP5-097] , which sets out how the Community Liaison Group is committed to being set up through the construction phase, peak replacement activities, and the decommissioning phase of the Scheme. During the operational lifetime of the Scheme through normal operations and maintenance work, a dedicated community contact point is secured through Table 12 of the Outline Operational Environmental Management Plan [REP5-073]

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				by Requirement 14 of Schedule 2 to the Draft DCO [REP5-012] .
SLD1-051	Human Health	Mental Wellbeing	3.1.32. Administrative support for the CLG should be provided by the Applicant. There also should be appropriate funding to support members of the CLG, in view of their time and responsibilities. While it is important that members of the CLG are not overburdened, SLD expects that regular monthly/bimonthly meetings will be appropriate during initial stages of the construction phase.	The Applicant notes this comment and refers to their response in The Applicant's Response to the Examining Authority's Second Written Questions [REP5-097] to ExQ HW2.1. The Applicant confirms that discussions in relation to the provision and operation of the CLG are ongoing, with all updates recorded through the Statement of Common Ground with Wiltshire Council [REP5-087] .
SLD1-052	Human Health	Mental Wellbeing	3.1.33. Consideration should also be given to having a separate CLG for the cable route during construction, so that councils local to it could be involved. This would also relieve the burden on CLG	The Applicant may consider how best to organise the CLG based on the number and breadth of its participants. This could be as a separate group for the Cable Route Corridor, a subgroup or focus group, or as a dedicated item in CLG meetings. Whilst the

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			members and parish councils near the solar PV sites.	Applicant understands the intention behind this comment, it is minded that it would not be keen to overly sperate or duplicate CLG roles or functionality given that matters in relation to transport and access, agriculture, construction compounds are likely to relevant to the entirety of the Order limits.
SLD1-053	Human Health	Mental Wellbeing	3.1.34. It is considered that the CLG should be consulted by the Applicant as part of the process of securing discharge of detailed design provisions. That is the best way that the local community can feel listened to in that process. The Applicant should present the views of the CLG to the Council when it seeks such discharge.	The Applicant maintains that Requirement 5 of the Draft DCO [REP5-012] establishes Wiltshire Council as the statutory body responsible for the approval of detailed design. While the Applicant intends to undertake informal consultation with the Council prior to submitting formal discharge applications, it has identified a mechanism whereby the progress of these discussions can be communicated to the Community Liaison Group (CLG)

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				to maintain technical transparency. However, the Applicant clarifies that the CLG functions primarily as an information forum for communicating the discharging of conditions rather than a formal consultee in the discharge process itself. The Scheme is already strictly controlled by the Works Plans [REP5-006] and the parameters set out in the Design Principles and Parameters [REP4-043]. The detailed design itself is subject to approval by the Council under Requirement 5 of the Draft DCO [REP5-012].
SLD1-054	Human Health	Mental Wellbeing	Question 3 3.1.35. The appointment and employment of a community liaison officer/manager by the Applicant is welcome. The appointment of a CLM could help to alleviate	The Applicant confirms the appointment of a Community Liaison Manager will be made by the Applicant, either as an employee of the Applicant or Undertaker, or as an independent appointment to fulfil the role of a 'relationship manager' as

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			pressures on volunteers and Parish Council members of the CLG. However, SLD suggests that that person might be employed by the Applicant.	described in the Suffolk SGD. This will be confirmed as part of the agreement of the Terms of Reference for the CLG pursuant to Requirement 4 of Schedule 2 to the Draft DCO [REP5-012].
SLD1-055	Human Health	Mental Wellbeing	3.1.36. The CLM should arrange the meetings for the CLG, be responsible for drafting in attendees and present the log of "you said we did" tracker" for accountability purposes. Their responsibility should also include taking notes of the meetings, circulating these and at the next meeting, presenting what has been completed.	The Applicant confirms that the role of the CLM will be as the lead administrator for the CLG, as set out in the Applicant's Response to the Examining Authority's Second Written Questions [REP5-097] (question HW1.2), and as secured at section 2.15 of the Outline CEMP [REP5-071] by Requirement 13 of Schedule 2 of Schedule 2 to the Draft DCO [REP5-012]. As such, it is envisaged that the CLM will be responsible (even if some actions are delegated) for organising meetings, providing minutes, circulation of information, and reporting.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				The Applicant confirms that discussions in relation to the provision and operation of the CLG are ongoing, with all updates recorded through the Statement of Common Ground with Wiltshire Council [REP5-087] .
SLD1-056	Human Health	Mental Wellbeing	3.1.37. The Applicant should also provide parish councillors and other members funded suitable training and support in respect of the project to carry out their duties.	The Applicant confirms that the duties of the CLG's members would be set out at the point CLG participated is opened via the project website. The extent to which training and additional funding is provided will be agreed with Wiltshire Council through the agreement of the CLG Terms of Reference, pursuant to Requirement 4 of Schedule 2 to the Draft DCO [REP5-012]. The Applicant confirms that discussions in relation to the provision and operation of the CLG are ongoing, with all updates recorded through the

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Statement of Common Ground with Wiltshire Council [REP5-087].
SLD1-057	Human Health	Mental Wellbeing	3.1.38. However, it is considered that the CLG should be properly independent, and SLD would welcome the appointing of an independent Chair or lead person paid for by the Applicant. That would allow confidence in the independence of that body.	The Applicant confirms that it is exploring if the independence of the CLG can be attained through the autonomy of the CLM, or through an independent group chair or vice-chair. The Applicant confirms that discussions in relation to the provision and operation of the CLG are ongoing, with all updates recorded through the Statement of Common Ground with Wiltshire Council [REP5-087].
SLD1-058	Human Health	Mental Wellbeing	Question 4 3.1.39. The CLM should set up and manage an enquiry line/inbox, log grievances and investigate issues with site managers and help implement fair solutions.	The Applicant confirms that the role of the CLM will be as the primary administrator for the CLG, and as the key communications link between the public and onsite Site Managers, for all enquiries and grievances, so that they can be duly acted

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				upon. This is secured through section 2.15 and Table 12 the Outline CEMP [REP5-071] by Requirement 13 of Schedule 2 of Schedule 2 to the Draft DCO [REP5-012] . This will also be set out in the CLG Terms of Reference be agreed pursuant to Requirement 4 of Schedule 2 to the Draft DCO [REP5-012] .
SLD1-059	Human Health	Mental Wellbeing	3.1.40. The SPD advises that developers adopt provisional Key performance Indicators for the monitoring and evaluation of engagement and community wellbeing. For example	In respect of Suffolk County Council's guidance, the Applicant refers SLD to its response to HW2.1 in the Applicant's Response to the Examining Authority's Second Written Questions [REP5-097]. The Applicant has responded to Wiltshire Council's recommendations at 'HW2.1a' in Table 2-1 above. The Applicant confirms that discussions in relation to the provision and operation of the CLG are ongoing, with all updates

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				recorded through the Statement of Common Ground with Wiltshire Council [REP5-087] .
SLD1-060	Human Health	Mental Wellbeing	3.1.41. Information is key for monitoring emotional wellbeing. The Applicant should consider conducting mental health audits during the construction phase.	The Applicant confirms that the provision of Scheme information would be delivered through Community Liaison Group to public representatives, and directly to public stakeholders (residents, businesses, charity groups) through the Stakeholder Communication Plan secured via section 2.15 of the Outline CEMP [REP5-071] by Requirement 13 of Schedule 2 of Schedule 2 to the Draft DCO [REP5-012]. The Applicant confirms that signposting to mental health providers will be provided on request, and given to the CLG members so that they can do the same. The Applicant confirms that discussions in relation to the

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				provision and operation of the CLG are ongoing, with all updates recorded through the Statement of Common Ground with Wiltshire Council [REP5-087] .
SLD1-061	Other Environmental Matters	Cumulative Green Glare	LV2.11 Aviation - Cumulative Green Glare <i>The Glint and Glare assessment submitted by Stop Lime Down [REP1-178] concludes that the RWY09 approach at Bowldown Farm and the RWY25 approach at Charlton Park each receive sustained cumulative green glare, in excess of 12,000 minutes from multiple contributing arrays. The applicant responded [REP2-039] that under the Sandia method and former Federal Aviation Administration guidance, there is no duration of green glare which is considered unacceptable from an aviation safety perspective, and the</i>	The Applicant notes SLD's reference to the duration of green glare but disagrees that this is significant, based on application of the FAA 2013 guidance and relevant project experience. The duration of glare towards a receptor is primarily considered as it influences the likelihood that the glare would be observed, rather than affecting the way in which glare is experienced. The duration of effect is therefore relevant if the glare could present a hazard (as a greater duration would result in a greater likelihood of the impact being perceived) but is less relevant where the glare falls below the

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<i>applicant therefore does not consider this to be a material cumulative effect. Furthermore, the applicant's Glint and Glare Study [APP-261] states that where solar reflections are of an intensity of 'low potential for temporary afterimage' (green glare), mitigation is not required.</i> <u><i>The Applicant:</i></u> <i>1) The applicant is asked to identify and submit extracts of relevant guidance supporting its position on this matter.</i> <u><i>Stop Lime Down:</i></u> <i>Stop Lime Down is asked to respond to the applicant on this and explain the following:</i> <i>2) What it considers is a correct assessment of the impact significance of the green glare on</i>	threshold at which it is likely to cause an issue for pilots. This threshold is typically set as 'yellow' glare, which is defined as glare which would produce an after-image of greater than one second, as determined through experimentation. There is no glare category below 'green' glare, and as such any reflection which falls below the one second of after-image is categorised in this manner whether it is just below the threshold or of a very low intensity where no after-image would occur. Summing the duration of all reflections is therefore not a useful metric for determining impact, as these reflections could be of a low intensity which would not cause any issues for pilots. The Applicant acknowledges that Bowldown Farm and Charlton

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<i>these approaches? Provide references to relevant guidance and submit this guidance into the examination.</i> <i>3) Whether it considers that mitigation measures could reduce the impact to an operationally accommodatable level or if the impact is a result of the overall scale, spread and layout of the proposed development?</i> 3.1.42. Please refer to Appendix B of this document which addresses the questions raised in ExQ2 in relation to glint and glare.	Park Airfields operate using visual flight procedures, but this does not mean that pilots are unable to observe any glare safely. The Applicant has adapted the Glint and Glare Assessment to typical procedures at general aviation airfields by including splayed approach paths and final sections of visual circuits, rather than just a straight 2-mile approach path which would be used for larger airports with commercial operations.
SLD1-062	Other Environmental Matters	Guidance	LV2.12 Road and Rail – Guidance <i>In response to Stop Lime Down's concerns [REP1-178] regarding the duration of yellow glare on road users and train drivers, the applicant [REP2-039] states that intensity of glare towards receptors</i>	The Applicant considers that field of view is the most relevant factor in determining impact upon road and rail receptors as this is the primary determinant of whether a reflection could cause a distraction. If a reflection is geometrically possible and visible

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<i>is not a relevant consideration under Pager Power's glint and glare guidance. Instead, reference is made to a driver's primary field-of-view to determine whether a driver is likely to be looking in the direction of solar reflections. At deadline 4 Stop Lime Down [REP4-132] questioned the use of guidance produced by the authors of the applicant's Glint and Glare Assessment [APP-261].</i> <u><i>The Applicant:</i></u> <i>1) The applicant is asked to provide justification of its use of Pager Power guidance and confirm if there is any other guidance available that supports its methodology regarding the assessment of the impact on road users and train drivers.</i>	within a driver's primary field of view, other relevant factors are considered to determine whether the glare is significant. These factors include the separation distance between the reflecting area and the receptor and the relative position of the Sun. The Applicant acknowledges that there is no formal guidance on the assessment of impacts towards road and rail receptors in the UK and is not aware of any guidance which has been formally adopted by National Highways.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			2) <i>The applicant is asked to submit the Pager Power guidance and other relevant guidance supporting its position.</i> <u>Stop Lime Down:</u> 3) <i>Stop lime down are asked if there is guidance supporting the position that the duration and intensity of glare towards road users and train drivers should factor into the assessment of impact on these receptors rather than just the driver's primary field of view? If so, submit the relevant guidance.</i> 3.1.43. Please refer to Appendix B of this document which addresses the questions raised in ExQ2 in relation to glint and glare.	

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
SLD1-063	Description and DCO Process	Statement of Common Ground	LV2.14 Statement of Common Ground and Questions Raised by Stop Lime Down at Deadline 4 <i>It is noted from the Statement of Commonality [REP4-059] that a draft SoCG between the applicant and Stop Lime Down is proposed to be submitted at deadline 5. In addition to the items requested by the ExA in ExQ1 LV1.28, the ExA request that written responses to the questions in paragraph 3.5.6 of Stop Lime Down's deadline 4 submission [REP4-132] are included, either within the SoCG or as a separate document.</i> 3.1.44. SLD note this question, which concerns the draft SoCG between the Applicant and SLD. Given the form of that document, which SLD considers to be disappointing given the discussions that have occurred between the Applicant and SLD, it is thought that some context would assist the	The Applicant is continuing discussions with Stop Lime Down regarding the Statement of Common Ground. An initial draft of the Statement of Common Ground with Stop Lime Down [REP5-090] was submitted at Deadline 5 and a revised document has been submitted at Deadline 6 [EN010168/EXAM/8.18] (Revision 2).

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			ExA. With that said, SLD wish to record that the meetings between its experts and the Applicant's have been very helpful, and the sharing of information and discussion has resulted in progress on both sides and the information submitted to the Examination. SLD welcome such meetings continuing.	
SLD1-064	Description and DCO Process	Statement of Common Ground	3.1.45. SLD was originally provided a draft SoCG on 1 April 2026 by the Applicant which, broadly, repeated both sides' Relevant Representations. Prior to the meeting on 20 April 2026 SLD provided a draft on 18 April 2026 which made some limited suggestions to aid discussion. Following that meeting SLD produced a further draft on 8 June 2026, whereby it attempted to provide new rows with specific items that appeared to be agreed between the parties or that SLD considered agreement might have been possible on. SLD recognise	The Applicant notes this comment and wishes to clarify the timeline of events for transparency. Following the original submission of the SoCG on 1 April, comments were received on 18 April from SLD prior to the meeting between the parties on 20 April, where it was agreed that SLD would set out any agreed matters and add in additional rows which would be informed by the production of their written representations. The provision of this document was intended to be provided by 10 May, so that an SoCG could be

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			that this SoCG took a while to produce, but did include a number of new line entries for discussion	submitted at Deadline 2. On 19 May, exchanges between the parties concluded that a version of the SoCG would need to be submitted at Deadline 3. An updated version of the SoCG was provided by SLD to the Applicant on 8 June alongside engagement regarding meetings between consultants from both parties. Noting a number of discussion points and additional matters became evident, alongside discussion and action points from June/July hearings, a meeting was held between the parties on 22 July, at which point it became clear that allowing additional time beyond Deadlines 4 would provide the most productive approach to progressing the SoCG. It was therefore agreed that the Applicant would revise the Statement of Common Ground with Stop Lime Down [REP5-

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				090] into its current form ahead of Deadline 5. This required a considerable amount of time and effort to develop the document to the point at which it could be submitted for Deadline 5. Work is continuing to progress the SoCG through Deadlines 6 and 7.
SLD1-065	Description and DCO Process	Statement of Common Ground	3.1.46. Following providing that draft SoCG, 9 meetings between SLD and the Applicant have taken place in a number of expert fields. SLD had understood that, as part of the Applicant holding the pen on that draft SoCG, it would reflect discussions and points of agreement between the parties arising from the expert meetings. At the meeting on 22 July 2026 SLD understood that those parts of the SoCG just repeating the Relevant Representations would be removed, and matters arising out of the SoCG meetings (including points of agreement, but also reflecting the points reached by	The Applicant has engaged with Stop Lime Down and their experts in July and August 2026. The Applicant prepared a new draft for the Statement of Common Ground (SoCG), with the aim to remove duplicated details provided in representations and evidence already before the Examination, and instead identify areas of agreement, disagreement and matters that remain under discussion. The revised document was shared for review and comment

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			both parties following discussion) would be included.	by Stop Lime Down on the 4 August 2026 to ensure that the revised structure and content of the SoCG were accurate and that it had sight of the document before submission at Deadline 5.
SLD1-066	Description and DCO Process	Statement of Common Ground	3.1.47. However, the draft SoCG that was provided on 4 August 2026 did not reflect the meetings (or, indeed, SLD's understanding of what was to be provided) save for to a limited degree.	The Applicant accepts the challenges of resource and time constraints from both parties to prepare the Statement of Common Ground for Deadline 5. The Statement of Commonality [REP5-085] states that the Statement of Common Ground submitted at Deadline 5 was an initial draft of the Statement of Common Ground with Stop Lime Down [REP5-090] . The Applicant confirmed in the Statement of Common Ground that the document would be updated for Deadline 6.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				A revised version was provided to SLD on 14 August, with SLD invited to make any further updates ahead of Deadline 6. SLD has since advised that, due to its own constraints, it will not be able to provide further comments prior to Deadline 6. The Applicant has submitted their own revisions at Deadline 6 [EN010168/EXAM/8.18] (Revision 2). The outstanding matters will therefore continue to be progressed between the parties in advance of Deadline 7.
SLD1-067	Description and DCO Process	Statement of Common Ground	Rather, in that draft SoCG: (1) a limited number of concessions that SLD had made in meetings were recorded; (2) the line entries SLD provided on 8 June 2026 were added to SLD's column in some form; and, (3) the Applicant's column was, broadly, changed to assert parts of its Environmental	The Applicant accepts the challenges of resource and time constraints from both parties to prepare the Statement of Common Ground for Deadline 5. With this in mind, additional efforts were made to advance matters for Deadline 6. The Applicant has submitted their

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			Statement and outline plans are acceptable. Functionally, 2 days were given for return of this draft.	own revisions at Deadline 6 [EN010168/EXAM/8.18] (Revision 2).
SLD1-068	Description and DCO Process	Statement of Common Ground	3.1.48. This draft was disappointing to receive. It is recognised that the Applicant has significant pressures and calls on its time, and that managing the changes in the SoCG from one which relied heavily on the Relevant Representations was considerable work. However, the document does not reflect the points of discussion and agreement at the meetings which SLD considers would assist the ExA. Given 2 days to respond, and given the difficulty of marshalling experts to input, SLD was limited in the changes it could make to the draft to better assist the ExA.	The Applicant has addressed this matter above in response SLD1-066. While the Applicant is disappointed that no further revisions could be provided by SLD for Deadline 6, it notes SLD's position and looks forward to progressing the outstanding matters ahead of Deadline 7.
SLD1-069	Description and DCO Process	Statement of Common Ground	3.1.49. SLD repeat that the meetings between the Applicant and SLD have been very helpful. It	The Applicant has responded to this matter above in responses SLD1-065 and SLD1-066 and agrees that further progress can

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			is hoped that they will continue given they have been fruitful (e.g. the progress made between the highways experts of HGV numbers, which, while they are likely to remain in dispute, are likely not to as significantly disagree).	be made following constructive discussions to date.
SLD1-070	Description and DCO Process	Statement of Common Ground	SLD continue to consider a SoCG would be helpful between the Applicant and it (and some rows in the current draft are helpful). However, it is considered that a renewed effort to produce a more helpful document for the ExA should be pursued. Given the period of time between Deadline 6 and Deadline 7, and the ISHs which will take place with experts on both sides present, it is hoped that substantial progress to a more helpful document to be submitted on Deadline 7 can be achieved.	The Applicant has responded to this matter above and confirms additional resource was given to provide SLD with an updated SoCG ahead of Deadline 6 to ensure ongoing discussions between consultant's had been better captured. This was provided on 14 August allowing time for SLD to update positions, however, the submitted Statement of Common Ground with Stop Lime Down [EN010168/EXAM/8.18] (Revision 2) at Deadline 6 only reflects updates from the Applicant.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
SLD1-071	Transport and Access	HGV Trip Generation	TT2.1 Construction Phase HGV Trip Generation <i>“...As can be seen from that table, the applicant assumed that a total of 588,988 solar PV panels would be installed on the sites and it is that number of panels which has informed the 1,200 HGV delivery figure. The ExA notes that this would roughly align with paragraph 7.10.11 of the Climate Change Chapter [APP-059], which stated that the total number of modules to be installed is expected to be 598,260.</i> <i>However, at deadline 3, the applicant's Climate Change Sensitivity Assessment Report [REP3-132], which in essence is a rebuttal to Wiltshire Council's and Stop Lime Down's written representations on climate change, stated that a notional figure of approximately 842,000 panels has</i>	The Applicant refers SLD to its response given to TT2.1 in the Applicant's Response to the Examining Authority's Second Written Questions [REP5-079]. The Applicant confirms that the capacity of 720 modules per High Cube container, compared with 500 modules in a standard 40ft container, has been verified by the relevant manufacturer and suppliers in the Applicant's operational supply chain. While the internal volume of a High Cube container is approximately 12% greater, its additional height allows modules to be stacked more efficiently, increasing the number transported per container. This container capacity has been incorporated into the Applicant's Engineering, Procurement and Construction (EPC) modelling on other IGP schemes, and verified by operational contractors to

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<i>been assumed, which reflects an estimated maximum achievable installed capacity of the Scheme within the defined design parameters. Further, in responding to Stop Lime Down's Transport submission at deadline 3 [REP3-133], the applicant suggested that up to 864,000 panels would be delivered if using high-cube containers (instead of regular containers) without increasing the number of HGV deliveries stated in the Transport Assessment (1,200).</i> <i>The ExA remains concerned that the applicant has underestimated the amount of solar PV panels required in its original assessments (and thus has not assessed the worst case), and for transport issues specifically that it is either maintaining that the 1,200 deliveries associated with 588,988 modules would be no greater for</i>	accurately inform the assessment. The Applicant has updated the Outline CTMP [REP5-083] at Section 6.17 submitted at Deadline 5 to confirm the use of high cube containers.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<i>864,000 panels (and the associated increase in mounting structures), or alternatively relies upon the 50% buffer to account for under assessment..."</i> 3.1.50. While this question is addressed to the Applicant, [REDACTED] [REDACTED] would add that the Applicant has previously stated that a high cube transport container can transport 720 solar panels whereas a conventional container can transport 500 panels. A high cube container is one foot higher than a conventional container (9' 6" rather than 8' 6" external). The latter is therefore 12% larger than a conventional container (1-(9.5/8.5) x	

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			100%). The Applicant is, however, suggesting that 44% more panels can fit in a high cube container (220/500 x 100%). This is inconsistent.	
SLD1-072	Transport and Access	ISH3 Action Points 7 and 8	<i>TT2.9 ISH3 Action Points 7 and 8</i> <i>At ISH3, the ExA issued Action Point 7 to the applicant to provide a set of plans showing which parts of the construction route(s) would fail to meet the highway code requirements for passing non-motorised users (NMUs) with sufficient verge protection buffer, and/ or to provide a log of the locations and the length of those locations that would not provide sufficient passing space for each of the NMUs (with verge protection buffer) in line with the highway code.</i>	The Applicant refers SLD to its response given to TT2.9 in the Applicant's Response to the Examining Authority's Second Written Questions [REP5-079].

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<i>On page 19 of the applicant's written summary of oral submissions at ISH3 [REP4-086] the applicant records part of that discussion, noting that "the ExA directed the applicant for deadline 4 to identify areas where the road is not 5.5 metres wide on the plans, using a red box around those areas." This is a slightly different version of the discussion, but nonetheless, at the top of page 20 of its post hearing note, the applicant then states that it has provided additional plans in Annex I of ES Volume 3 Appendix 13-1: Transport Assessment [EN010168/APP/6.3] (Revision 4) (Drawing PL109B) which shows the width of construction routes; and Appendix E in the Outline Construction Traffic Management Plan [EN010168/APP/7.22] (Revision 4) which includes proposed Highway Improvement</i>	

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<i>Area Drawings for road widening and AIL movements."</i> <i>The ExA notes that the citation to Drawing PL109B is incorrect as no such plan number is included in Annex I of the Transport Assessment [REP4-037], and similarly no such drawing number is provided in Appendix E of the oCTMP either [REP4-057]. Whilst the ExA notes that Drawing Nos. PL302, PL303, PL304, PL305, PL306 and PL309 included in Annex I of the Transport Assessment [REP4-037] appear to now show either passing bays and/or dimensions of various parts of some of the construction routes, this is not strictly in accordance with ISH3 Action Point 7, although drawing numbers PL302, PL303 and PL304 appear to address ISH3 Action Point 8</i>	

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<u>The Applicant:</u> 1) The applicant is requested to confirm whether another drawing specifically addressing Action Point 7, e.g. Drawing PL109B referred to in its ISH3 Note, should have been provided, or whether reference to that drawing is an error, with drawing numbers PL302, PL303, PL304, PL305, PL306 and PL309 instead intended to fulfil Action Point 7? 2) The applicant is also requested to advise whether the existing road widths shown on the latest drawings referred to above were actually measured on site? <u>Wiltshire Council and Stop Lime Down:</u> 3) Advise whether drawing nos. PL302, PL303 and PL304 now	

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<i>provide sufficient dimensions and details to the satisfaction of the parties to demonstrate sufficient passing space on Alderton Road and the Fosse Way, in accordance with ISH3 Action Point 8. Comments on drawing numbers PL305, PL306 and PL309 are also welcomed. The ExA is particularly interested to understand if additional drawings, dimensions or annotations are still required (and why) (including whether colour-shaded route sections, as per Wiltshire Council's suggestion at ISH3 and its post hearing submission [REP4-092] remain necessary).</i> 3.1.51 [REDACTED] notes that the drawings which have been provided within the Transport Assessment are generally inadequate as they are inaccessible due to the size/configuration of the file. [REDACTED]	

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			██████ has requested these drawings separate to the Transport Assessment but access has been difficult technically. ██████ will comment further upon the measurements within the drawings and intervisibility when the information is received.	
SLD1-073	Transport and Access	ISH3 Action Points 7 and 8	3.1.52. ██████ has reasons to doubt the accuracy of the dimensions provided by the Applicant. On 2 August 2026, ██████ took measurements on site in relation to Drawing 305 (Bradfield Cottages) and 309 (Route to Lime Down A), as these are both locations which fall outside the Applicant's Highway Improvement Areas. ██████ measurements on site do not accord with the measurements presented by the Applicant.	The Applicants survey data was undertaken by experienced independent survey companies, using the most up-to-date and sophisticated Trimble Robotic surveying equipment, GPS Glonass receivers and Faro 3D scanners along with the latest data collection technologies available. The survey is carried out in accordance with BSENISO9001:2000. Unless the SLD survey has been undertaken with this level of accuracy, it is unlikely the measurements will match.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
SLD1-074	Transport and Access	ISH3 Action Points 7 and 8	3.1.53. [REDACTED] visit to the section of the road between the northern end of the Fosse Way and Lime Down A revealed that almost all the widths and the lengths of carriageway over which the target widths are achieved have been overstated by the Applicant.	See response to SLD1-073. For this section of road we had a new topographical survey a revised drawing is to be submitted at deadline 6. See drawing SP38 Revision A in Annex J of the Transport Assessment ES Volume 3 Appendix 13-1 [EN010168/APP/6.3] (Revision 6), and drawing SP50-C in Annex K of the Transport Assessment ES Volume 3 Appendix 13-1 [EN010168/APP/6.3] (Revision 6).
SLD1-075	Transport and Access	ISH3 Action Points 7 and 8	There are significant sections where it is suggested that safe passing widths (5.5m) are available when it is clear that they are not. Even taking generous measurements in relation to where the embankment has been eroded into a concave slope (measuring into the loose material within the concavity which in many cases which would have been beyond the	See response to SLD1-073. New topographical survey information has been collected for this road and drawings with revised measurements have been updated and submitted for Deadline 6. The drawing references are PL309 Revision A in Annex I of the Transport Assessment ES Volume 3 Appendix 13-1 [EN010168/APP/6.3]

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			edge of the carriageway), there were still differences.	[EN010168/APP/6.3] (Revision 6) and SP50 Revision 6 in Annex K of the Transport Assessment ES Volume 3 Appendix 13-1 [EN010168/APP/6.3] (Revision 6).
SLD1-076	Transport and Access	ISH3 Action Points 7 and 8	Whereas the Applicant's measurements give the impression that this section of the route is able to safely accommodate 2-way HGVs, the reality of the situation is that there are very few passing opportunities and large vehicles would be forced to mount verges, break into embankments and over-run verges either side of access points.	See Applicant's response to SLD1-075. Only one construction access is located along this route with a maximum of 19HGVs on a peak day.
	Transport and Access	ISH3 Action Points 7 and 8	Forward visibility is also restricted due to bends in the road. For example:	See response to SLD1-073
SLD1-077	Transport and Access	ISH3 Action Points 7 and 8	The width of the carriageway around the sharp bend north of the Hullavington junction on Bradfield Cottages is identified, by the Applicant, to provide a width of	See response to SLD1-073

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			between 6.42m and 6.53m either end of the bend. [REDACTED] measured the width to be 5.8m in both cases, increasing to 6.0m at the centre of the bend;	
SLD1-078	Transport and Access	ISH3 Action Points 7 and 8	The width of the carriageway north of the bend is shown by the Applicant to be 5.84m in width whereas [REDACTED] measures it as 5.4m;	See response to SLD1-073
SLD1-079	Transport and Access	ISH3 Action Points 7 and 8	The length of the section of carriageway at the Brookside junction north of the railway line that is over 5.5m in width is identified as 26.46m by the Applicant. [REDACTED] measured it as 13.1m;	See response to SLD1-073
SLD1-080	Transport and Access	ISH3 Action Points 7 and 8	The length of the section of Bradfield Cottages immediately north of the railway at the employment access over 5.5m in width is shown by the applicant to be 32.3m whereas [REDACTED] measured it as 25.1m;	See response to SLD1-073

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
SLD1-081	Transport and Access	ISH3 Action Points 7 and 8	The Applicant identifies a section of carriageway north of the Flying Monk where the carriageway is 5.63m wide over a length of 25.2m. [REDACTED] measured all sections of carriageway in this area to be less than 5.5m in width;	See response to SLD1-073
SLD1-082	Transport and Access	ISH3 Action Points 7 and 8	On the road to Sherston (Lime Down A) the Applicant identifies two sections of road north of Fosse Way with lengths of 57.3m and 56.57m that are over 5.5m in width. [REDACTED] measured both sections as around 35m;	See response to SLD1-073
SLD1-083	Transport and Access	ISH3 Action Points 7 and 8	The Applicant identifies numerous sections further north where the road is said to be over 5.5m in width. The vast majority of this section of road is less than 5.5m in width.	See response to SLD1-073
SLD1-084	Transport and Access	ISH3 Action Points 7 and 8	3.1.54. From [REDACTED] observations on site it is clear that the Applicant has overstated the road space available at all of the identified potential passing spaces	See response to SLD1-073

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			to a point north of the Flying Monk. This section is particularly constrained and suffers from poor forward visibility in many places. [REDACTED] remains sceptical of the reliability of the measurements in the other drawings, in light of these errors.	
SLD1-085	Transport and Access	ISH3 Action Points 7 and 8	3.1.55. The drawings explain that they are based on a topographical survey produced by Dando Surveying Limited, dated 30 April 2025. [REDACTED] notes that it is possible the Applicant has misinterpreted the topographical surveys which have been relied upon to identify the dimensions, resulting in the issues identified.	The Applicant disagrees with this comment. The topographical surveys have been carefully considered. The Applicant has used the edge of the usable carriageway in determining road widths and hasn't used any verge in the width measurement.
SLD1-086	Transport and Access	ISH3 Action Points 7 and 8	3.1.56. In relation to passing places more generally, [REDACTED] notes that the Applicant is suggesting that driveways and side-roads can be used as passing places in some areas. [REDACTED] is concerned that some of these driveways and	All identified passing places have adequate visibility to any passing vehicle as can be seen in Annex J of the ES Volume 3 Appendix 13-1 Transport Assessment [REP5-061] . Passing and use of passing bays is normally

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			side-roads (e.g. access into the Flying Monk café) will be used on a regular basis and there is a risk of vehicle collision if vehicles are regularly forced into bellmouths that accommodate vehicles approaching the main road.	undertaken at slow speeds. In summary, the Applicant does not regard this as a safety issue.
SLD1-087	Transport and Access	ISH3 Action Points 7 and 8	The Street junction at Hullavington is another location where vehicles travelling north on the lane may pull across the give-way line at the junction into the path of vehicles leaving the village and approaching the lane	Intervisibility is good at this location and road width of 6m, so this is unlikely. See PL305 revision B in Annex I of the ES Volume 3 Appendix 13-1 Transport Assessment [REP5-061] .
SLD1-088	Transport and Access	ISH3 Action Points 7 and 8	The Applicant should distinguish between lay-bys or road widenings, private accesses and side roads when identifying potential places for vehicles to pass.	The drawings provided show proposed widening and side road or existing access locations on the base mapping.
SLD1-089	Transport and Access	ISH3 Action Points 7 and 8	3.1.57. [REDACTED] notes that the drawings do not show the inter-visibility at key locations along the access routes.	Intervisibility is provided on drawings. See SP34 revision B and SP36 revision B in Annex J of the ES Volume 3 Appendix 13-1 Transport Assessment [REP5-061] . Both show

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				intervisibility and SP 51 revision A in Annex K of the ES Volume 3 Appendix 13-1 Transport Assessment [REP5-061] .
SLD1-090	Transport and Access	ISH3 Action Points 7 and 8	It is therefore unclear whether situations could arise where HGVs would be forced to reverse and over-run verges because there is no available passing place between them and an approaching vehicle.	Given the relatively low number of HGVs in an hour, the number of passing bays and existing passing points and good intervisibility at the majority of passing places, and the management measures in the Outline CTMP [REP5-083] , it is the applicants view the applicant has reduced the likelihood of these events from occurring. Any damage to verges would be rectified through conditions surveys.
SLD1-091	Transport and Access	ISH3 Action Points 7 and 8	██████ does not believe the intervisibility on the Bradfield Cottages and Route to Lime Down A is adequate, having assessed this on site and the Applicant proposing no changes to these roads.	The Applicant notes this comment.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
SLD1-092	Transport and Access	Phasing	TT2.13 Construction Phasing <i>As can be seen from that table, the applicant assumed that a total of 588,988 solar PV panels would be installed on the sites and it is that number of panels which has informed the 1,200 HGV delivery figure. The ExA notes that this would roughly align with paragraph 7.10.11 of the Climate Change Chapter [APP-059], which stated that the total number of modules to be installed is expected to be 598,260. However, at Deadline 3, the applicant's Climate Change Sensitivity Assessment Report [REP3-132], which in essence is a rebuttal to Wiltshire Council's and Stop Lime Down's written representations on climate change, stated that a notional figure of approximately 842,000 panels has been assumed, which reflects an estimated maximum achievable installed capacity of the Scheme within the defined design</i>	The Applicant directs SLD to its response given to TT2.13 in the Applicant's Response to the Examining Authority's Second Written Questions [REP5-097]. Trip Generation calculations have been refined as further detail of the project has come forward. The Applicant has since submitted revised trip generation calculations in the same format as the SLD calculations at Deadline 5 - Highways Technical Note in Response to Appendix A of the SLD Deadline 4 Submission [REP5-107]. These calculations are currently being discussed with SLD's transport consultant. The calculations assume 467 days for D west and 95 for D east.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<i>parameters. Further, in responding to Stop Lime Down's Transport submission at deadline 3 [REP3-133], the applicant suggested that up to 864,000 panels would be delivered if using high-cube containers (instead of regular containers) without increasing the number of HGV deliveries stated in the Transport Assessment (1,200). The ExA remains concerned that the applicant has underestimated the amount of solar PV panels required in its original assessments (and thus has not assessed the worst-case), and for transport issues specifically that it is either maintaining that the 1,200 deliveries associated with 588,988 modules would be no greater for 864,000 panels (and the associated increase in mounting structures), or alternatively relies upon the 50%</i>	

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<i>buffer to account for under assessment.</i> 3.1.58. The calculations that have been undertaken to date by the Applicant derive an average daily HGV flow for Area D by assuming a 250 day construction period. This is more than the originally assumed 6-month construction period for the 400kV substation but less than the now suggested 2 year construction period.	
SLD1-093	Transport and Access	Phasing	If the Applicant's figures are used, the peak level of HGV movements to and from Area D would decrease but the period over which they are spread would increase.	Trip Generation calculations have been refined as further detail of the project has come forward. The Applicant has since submitted revised trip generation calculations in the same format as the SLD calculations at Deadline 5 - Highways Technical Note in Response to Appendix A of the SLD Deadline 4 Submission [REP5-107]. These calculations are

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				currently being discussed with SLD's transport consultant.
SLD1-092	Transport and Access	Phasing	██████ has raised concerns that the HGV trip generation for the 400kV substation and the BESS have been under-estimated. ██████'s latest calculations, as set out in his latest spreadsheet calculations [REP4-132] (p. 141), are based on a 462 day construction period for Area D and lead to an average daily level of HGVs that is slightly higher than the Applicant's despite a much longer construction period.	Trip Generation calculations have been refined as further detail of the project has come forward. The Applicant has since submitted revised trip generation calculations in the same format as the SLD calculations at Deadline 5, in the Highways Technical Note in Response to Appendix A of the SLD Deadline 4 Submission [REP5-107]. These calculations are currently being discussed with SLD's transport consultant.
SLD1-093	Transport and Access	Phasing	3.1.59. The frequency of HGVs meeting on the Fosse Way and Bradfield Cottages has now been agreed (see attached at Appendix C). This is based on the Applicant's estimate of '+50%' hourly flows as set out in Appendix F of the TA [REP4-037]. This indicates that there would be 2.31 meetings of	The probability formulae were agreed with SLD, however the passing places weren't removed from the route length overestimating the chances of two HGVs meeting on less wide roads outside of the widening or existing passing places. The probability calculations will be

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			HGVs on the Fosse Way and 1.71 meetings of HGVs on Bradfield Cottages.	submitted at Deadline 6. Further if two HGCV's are released at a time in the peak construction hour this would further reduce the probability of two HGVs meeting to less than one per hour.
SLD1-094	Noise and Vibration	Noise Monitoring LT7	NV2.2 Noise Monitoring Location LT7 <i>In response to ExQ1 NV1.4 [REP3-128] the applicant advised that the sound level meter at LT7 stopped monitoring after approximately 14 hours of a week-long survey, due to a technical issue with the meter, and that the limited data collected was inconsistent with typical expectations for a rural setting, as the background night-time sound levels were over 10 dB higher than those during the daytime.</i> <i>Explain why repeat noise surveys at LT7 have not been undertaken,</i>	The Applicant has filtered the survey data for adverse weather conditions, and it does not have a material impact on the background levels, with median levels within 1 dB of those reported. This information will be submitted in an updated version of the ES Volume 3, Appendix 14-3 Baseline Noise Survey [EN010168/APP/6.3] (Revision 2) at Deadline 6.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<i>given that data from LT7 would have been used to inform the baseline sound level at R24 (Lordswood Cottage) and R25 (Commonwood Farm)? If the applicant considers that noise surveys at another location were sufficient to inform the baseline level at R24 and R25 please explain this further, including the distances of the LT7 meter from those receptors and the distance(s) of any other meter(s) relied upon from R24 and R25.</i> 3.1.60. The Applicant confirmed that weather conditions had not been monitored during the surveys, and that the measurement data had therefore not been filtered accordingly.	
SLD1-095	Noise and Vibration	Noise Monitoring LT7	3.1.61. The modal LA90 background from the dataset had been selected as the 'typical' background level by the Applicant, unless the value was an obvious	Included for context and does not require response.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			outlier, in which case an alternative value was selected using professional judgement to represent a realistic median/modal value.	
SLD1-096	Noise and Vibration	Noise Monitoring LT7	3.1.62. SLD maintain that, given the uncertainty of the dataset collected, using the lower ranges of background levels measured would be the most appropriate approach.	This is noted and has been responded to in the Applicant's Response to Submissions Received at Deadline 3 [REP4-082] , item SLD-016.
SLD1-097	Noise and Vibration	Noise Monitoring LT7	3.1.63. SLD's opinion differs from the Applicant's on how this affects the assessed significance of noise impacts and the inherent uncertainty within the ES noise assessment, as SLD consider that the adopted approach discounts significant periods during which the background noise is substantially lower.	This position is noted in row 3.10.7 of the SoCG.
SLD1-098	Noise and Vibration	Noise Monitoring LT7	3.1.64. Using a fixed 30 dB background threshold further masks the fact that the area can be very quiet. For example, receptors R24 and R25 were allocated	Local roads are lightly trafficked and therefore would not contribute to the background level. The use of a lower threshold of 30 dB has been

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			monitor LT8 to define the baseline. (ref: ES Chpt 14 table 14-12). However, R24 is approx. 750m from LT8, and R25 approx. 1.25km away. LT8 itself is located within 100m from the nearest public road (Fosse way). Thus, both R24 and R25 are significantly further from the closest though road	justified in both the ES and responses throughout examination. It has also been accepted by Wiltshire Council.
SLD1-099	Noise and Vibration	Noise Monitoring LT7	3.1.65. Notwithstanding this, the data collected at LT8 has been deemed by the Applicant to be 'representative' of those receptors, in the absence of the data at the closer monitoring location. Given the increased uncertainty of the validity of the data through the large difference in location, this assumption should have at least adopted a precautionary approach by using the lower measured ranges of background levels	This position is noted in row 3.10.4 of the SoCG.
SLD1-100	Noise and Vibration	Background Noise Level Methodology	NV2.3 Background Noise Level Methodology	The Applicant refers SLD to its response given to NE2.3 in the Applicant's Response to the

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<i>In ExQ1 NV1.5 the ExA asked the Council to reconsider whether the applicant's use of fixed 30dB as a minimum background noise level at night continued to be appropriate. In its response [REP3-142], the Council presented the relevant British Standard and guidance and agreed that it was acceptable to replace background noise measurements with a fixed level as the applicant had done.</i> <i>The ExA appreciates the Council's explanation of the relevant British Standard and the associated guidance from the Association of Noise Consultants, which appears to allow for such an approach, but the ExA nonetheless still queries whether the effect of doing this firstly ignores the context of the receiving environment, and secondly artificially raises the baseline and therefore raises the</i>	Examining Authority's Second Written Questions [REP5-097] which addresses the ExA's question on background noise level methodology. The Applicant's approach acknowledges the very quiet receiving environment in setting LOAEL and SOAEL levels below those for which there is evidence of effects on health and quality of life, and below those which have been accepted for other solar farm DCOs in rural areas.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<i>LOAEL and SOAEL level (which is set against the baseline), which in turn informs the assessment of significance in EIA terms.</i> <i>The ExA would welcome a further response from the Council to these queries, particularly as the definition of 30dBLA90 as a 'very low' background level was removed from the British Standard and is not supported by the current version of BS4142:2014, and given the rural location where background levels at night were found for some residential receptors to be as low as 20dB and may therefore have given rise to a lower threshold for receptor sleep disturbance than the internal noise levels recommended in both BS 8233:2014 and the World Health Organisation (WHO) Guidelines, which were also cited by the Council.</i>	

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			3.1.66. SLD's position remains that the approach does ignore the context of a very quiet receiving environment.	
SLD1-101	Noise and Vibration	Background Noise Level Methodology	3.1.67. SLD has discussed the adoption of the fixed background level with the Applicant at the SoCG meeting and how, in the opinion of SLD's experts, this obscures the true significance of the operational noise impact and the extent of change presented within the ES, as it dispenses with comparison to actual background levels and effectively adopts a fixed operational rating level limit of 35 dB.	This is acknowledged. The Applicant does not consider rating levels below 35 dB to be significant since there is no evidence for this in health studies and the existing ambient levels in the area are already above this threshold.
SLD1-102	Noise and Vibration	Background Noise Level Methodology	3.1.68. SLD have highlighted that this level of noise will clearly be audible to some people at times and may cause annoyance - potentially to the degree that it disturbs sleep and quiet enjoyment of their homes.	Planning Practice Guidance Noise states that noise can be below the LOAEL and still be audible. We are not designing to a level that is not perceptible, but one that is not intrusive in line with requirements set out in the

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Noise Policy Statement for England. While this noise will be audible on occasion, it will be at such a low level and below existing ambient sound sources such that it would not constitute a significant disturbance to sleep or the quiet enjoyment of the home.
SLD1-103	Noise and Vibration	Background Noise Level Methodology	Although it may be argued that this fixed level sits below recognised internal noise thresholds derived largely from transportation noise research (which represents the principal body of evidence relating to sleep disturbance), SLD's expert's opinion is that the ES methodology fails to adequately reflect this important element.	The assessment methodology is based on British Standards and industry standard guidance documents. The approach to assessing operational noise has been accepted by Wiltshire Council.
SLD1-104	Noise and Vibration	Background Noise Level Methodology	3.1.69. The Applicant appeared to accept at the SoCG meeting that the ES could have been presented more clearly and accepted that some people may clearly hear the noise at times and could be annoyed by it.	The Planning Practice Guidance Noise hierarchy table is used to interpret LOAEL and SOAEL as defined in the Noise Policy Statement for England. The table "...summarises the noise exposure hierarchy, based on the

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				<i>likely average response of those affected</i> ". Applicant maintains that the approach to significant effects and mitigation follows this guidance and so remains robust and appropriate.
SLD1-105	Noise and Vibration	Background Noise Level Methodology	3.1.70. Overall, SLD's position remains that the assessment does not adequately communicate the likely perceptibility of the operational noise or the potential for adverse effects on residential amenity.	The assessment methodology is based on British Standards and industry standard guidance documents. The approach to assessing operational noise has been accepted by Wiltshire Council.
SLD1-106	Noise and Vibration	Background Noise Level Methodology	3.1.71. The fixed threshold masks the initial significance estimate of comparing the operational noise with the background level - implying it is similar, where in fact it can be significantly above the background levels during quiet evening and nighttime periods.	There are periods of quiet background sound when the scheme will, at a low level, be audible. This does not change the Applicant's approach to the definition of significant effects, which has been accepted by Wiltshire Council.
SLD1-107	Noise and Vibration	Background Noise Level Methodology	3.1.72. The research data into sleep disturbance noise thresholds is related to maximum noise levels from aircraft. The internal noise	BS 4142 clearly uses BS 8233 for assessing sleep disturbance in assessment examples. The example in Table A.6 states: "BS

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			level guidelines in BS8233 are based upon WHO long term health effects, focussed on transportation noise sources, not industrial noise.	<i>8233 indicates that 35 dBA sound level from the plant, equating to an internal level of around 25 dBA or lower, with no significant acoustically distinguishing characteristics is suitable for a bedroom.</i> As such, the approach to assessing internal noise follows guidance in BS 4142 and is appropriate.
SLD1-108	Noise and Vibration	Background Noise Level Methodology	3.1.73. The proposed SOAEL thresholds (which is the committed target) will give rise to internal industrial noise which would be readily audible and inescapable where there are low background levels	The internal levels would be low enough such that they would, in most instances, be masked by existing ambient sounds, not to mention internal sound of any kind.
SLD1-109	Noise and Vibration	Background Noise Level Methodology	3.1.74. The Applicant has described this as being similar to a kitchen fridge. However, this rather makes the point as people do not typically or by choice have their kitchen fridges in their bedroom (as, among other things, the noise would be audible and annoying).	The refrigerator analogy was made with reference to external environmental noise levels rather than internal noise conditions. It was intended solely as a familiar reference point to assist in contextualising the reported sound level for a non-technical

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				audience and was not intended to imply that the noise would be experienced in the same manner as a refrigerator located within an occupied room or bedroom.
SLD1-110	Noise and Vibration	Operational Noise Level Mitigation	NV2.4 Operational Noise Level Mitigation <i>In response to ExQ1 NV1.8 [REP3-128], the applicant refers to the national policy for noise and vibration, in which significant effects are identified as those above the SOAEL. It added that, as moderate effects for the high sensitive receptors listed in Table 14-12 and Table 14-13 (of ES Chapter 14) correspond to levels above the LOAEL and below the SOAEL they are excluded from the classification of significance for noise and vibration as they are below the SOAEL. On reviewing the Noise Policy Statement for England (NPSE), the ExA notes that it describes LOAEL as the</i>	The assessment does not target the SOAEL and adopt the "minimum mitigation". In line with requirements in the Noise Policy Statement for England, all reasonable measures have been applied to reduce noise levels between LOAEL and SOAEL. Further detail has been provided in the Applicant's Response to the Examining Authority's Second Written Questions [REP5-097], item NE2.4

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<i>level above which adverse effects on health and quality of life can be detected, whilst SOAEL is described as the level above which significant adverse effects on health and quality of life occur. This appears to confirm the applicant's position in its ExQ1 NV1.8 response around significant effects.</i> <i>Nonetheless, whilst the first aim of the NPSE is to avoid significant adverse impacts on health and quality of life from environmental, neighbour and neighbourhood noise, its second aim it to mitigate and minimise adverse impacts on health and quality of life from environmental, neighbour and neighbourhood noise. The NPSE clarifies that the second aim of the NPSE refers to the situation where the impact lies somewhere between LOAEL and SOAEL and it requires that all reasonable steps should be taken to mitigate and minimise adverse effects on health</i>	

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<i>and quality of life while also taking into account the guiding principles of sustainable development.</i> <i>Paragraph 14.10.50 of ES Chapter 14 [REP1-021] states that 16 receptors are predicted to experience operational noise levels between the LOAEL and SOAEL:</i> <i>• North of Hullavington around Lime Down D (R10 Bradfield Manor);</i> <i>• Norton between Lime Down B and D (R15-Gorseley Leaze House, R16–West Lodge, R41–Honey Lane Cottage, R43–Vine Tree Cottage, R44–Orchard Cottage);</i> <i>• North of Grittleton around Lime Down C (R19 Surrendell Farm);</i> <i>• Pig Lane between Lime Down C and D (R20 Townleaze Farm, R21–Farleaze South, R23</i>	

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<i>Farleaze Cottages, R45–Grain Store Barn); and</i> <i>Ladyswood around Lime Down A and C (R28 Lordswood Farm, R29–Ladyswood Farm, R30 Ladyswood Cottage, R35–Fosse Farm, R36 Lordswood Cottage)</i> <i>Paragraph 14.10.56 adds that the oOEMP commits to the resulting levels at properties to provide reassurance that the Scheme as built will not lead to significant effects from noise. The ExA is concerned that this does not demonstrate compliance with the NPSE and the requirement to mitigate and minimise adverse effects, rather merely commits to operational noise remaining between LOAEL and SOAEL, which for those 16 receptors would be worse than the present situation.</i>	

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<i>The ExA therefore requests the applicant's clear position on whether it can commit to lower noise emissions and targets for those 16 high sensitivity receptors in the oOEMP, taking proper account of the very quiet rural nature of the area in which those properties are situated, and the NPSE aim of mitigating and minimising adverse noise impacts.</i> 3.1.75. SLD's position is maintained in that the Applicant should demonstrate how quiet the development can be mitigated to, targeting the LOAEL, not adopting the minimum mitigation to satisfy being at or below the SOAEL.	
SLD1-111	Noise and Vibration	Operational Noise Level Mitigation	3.1.76. There is additional noise mitigation that can be incorporated, and the Applicant has not demonstrated whether or not this would be impracticable or unsustainable in policy terms.	All practicable and sustainable mitigation has been applied, with further analysis presented in the Applicant's Response to the Examining Authority's Second

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Written Questions [REP5-097] , item NE2.4.
SLD1-112	Noise and Vibration	Operational Noise Level Mitigation	.1.77. SLD have discussed with the Applicant the issue of the Applicant targeting noise levels at, or just below, the adopted SOAEL, rather than seeking to mitigate and minimise effects occurring between the LOAEL and SOAEL, consistent with the aims of the NPSE.	The Applicant has always sought to minimise effects between the LOAEL and SOAEL, within the context of sustainable development. This is demonstrated through the adoption of all reasonable mitigation measures as discussed in paragraphs 14.10.55 and 14.10.56 of ES Volume 1, Chapter 14 Noise and Vibration [REP5-024] .
SLD1-113	Noise and Vibration	Operational Noise Level Mitigation	3.1.78. For effects above the LOAEL, SLD have emphasised that many receptors would experience an audible, continuous increase in background noise where none previously existed.	The background noise level does not, in itself, determine the perceptibility of a sound. The $L_{A90,T}$ background level is the noise level exceeded for 90% of the measurement period and is a statistical descriptor of the relative quiet of a location. Perceptibility depends on the level of the source noise relative to the existing ambient sound

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				environment. Consequently, it is incorrect to suggest that there would be an "audible, continuous increase in background noise".
SLD1-114	Noise and Vibration	Operational Noise Level Mitigation	3.1.79. The Applicant's main response has been that the NPSE effect thresholds adopted are consistent (or lower than) with other consented solar applications.	The Applicant's main response is that the approach is justified in terms of available evidence and national policy. Although it is true that the approach is consistent with previous applications, accepted by the local authority and the ExA.
SLD1-115	Noise and Vibration	Operational Noise Level Mitigation	3.1.80. In relation to mitigation, the Applicant has explained that the inherent mitigation measures considered (including the BESS bunds/barriers) were optimised and that increasing their heights would not significantly reduce noise levels. However, the cost-benefit/sustainability analysis supporting this conclusion has not been provided and does not appear to consider increased barrier heights or other potential	Increased barrier heights would not result due to diminishing returns when increasing a barrier height after line-of-sight has been broken would have no impact on the noise levels at the distances involved and may even have further negative landscape effects. A full enclosure of the central BESS in its entirety is not proportionate.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			options such as fully enclosing the BESS.	
SLD1-116	Noise and Vibration	Operational Noise Level Mitigation	3.1.81. SLD has raised the question of the provision of silencers, particularly for the 166 distributed conversion units, of which only seven have silencers in current plans. SLD highlighted that these noise sources (primarily cooling fans) are not overly complex, and that the provision of silencers (being a relatively simple piece of noise control hardware) to minimise the widespread noise from these sources would not, in SLD's expert's opinion, represent a significant financial burden or an unreasonable noise minimisation technique.	This is acknowledged and is responded to in the Applicant's Response to the ExA's Second Written Questions [REP5-097] , item NE2.4. There is quite an onerous maintenance burden and efficiency risk connected with such silencers, nevertheless they have been included in ES Volume 1, Chapter 14 Noise and Vibration [REP5-024] where they would provide noticeable benefit.
SLD1-117	Noise and Vibration	Operational Noise Level Mitigation	3.1.82. The Applicant appeared to accept this observation in relation to the conversion unit mitigation, although they highlighted that they had adopted a worst-case approach by considering two	This is acknowledged and addressed in the Applicant's Response to the Examining Authority's Second Written Questions [REP5-097] , item NE2.4.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			converters per position where there may only be one. Whilst this assumption is conservative, it still allows for higher committed operational noise levels than may ultimately be necessary, indicating that further reductions could potentially be achieved.	
SLD1-118	Noise and Vibration	Operational Noise Level Mitigation	3.1.83. In respects of the NPSE, it should be noted that this policy is incorporated into NPS EN1 and that "Due regard" must be given to it (para 5.12.16). In addition, for the Secretary of State's decision making, para 1.7 of the NPSE is functionally repeated in NPS EN-1 at para 5.12.17. Importantly, the second bullet point states "mitigate and minimise other adverse impacts on health and quality of life from noise". It is clear from NPSE at para 2.24 that this is identifying (as the ExA do as well) a requirement to mitigate and	This is acknowledged. It is a point which has not been disputed by the Applicant which has always sought to mitigate and minimise between LOAEL and SOAEL within the context of sustainable development.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			minimise noise between SOAEL and LOAEL.	
SLD1-119	Draft DCO	Changes to the draft DCO	<i>DCO2.1 Outline any remaining or residual issues that you have with any articles, requirements or schedules of the dDCO, set out why the applicant has not yet resolved your concerns or why you are not content with the applicant's justification, and define what remedy or solutions you are seeking (including suggested redrafting if applicable) to address your concerns, and explain (make your case) why the applicant, the ExA and the SoS should consider such amendments to the dDCO. Statutory Undertakers are also alerted to ExQ2 DCO2.23 which specifically relates to protected provisions.</i> <u>DCO2.1– Changes to the draft DCO</u>	The Applicant notes this comment and has responded to the individual suggestions below.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			3.1.84. In relation to DCO2.1, the ExA has asked parties to provide further comment in relation to the text of the dDCO and associated management plans. In the first instance, the parties are invited to: "Outline any remaining or residual issues that you have with any articles, requirements or schedules of the dDCO, set out why the applicant has not yet resolved your concerns or why you are not content with the applicant's justification, and define what remedy or solutions you are seeking (including suggested redrafting if applicable) to address your concerns, and explain (make your case) why the applicant, the ExA and the SoS should consider such amendments to the dDCO. Statutory Undertakers are also alerted to ExQ2 DCO2.23 which specifically relates to protected provisions."	

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SLD1-120	Draft DCO	Article 2(1): "permitted preliminary works" / Schedule 2, Requirement 13(1)	Article 2(1): "permitted preliminary works" / Schedule 2, Requirement 13(1) 3.1.85. SLD has not yet seen the permitted preliminary works management plan (which the ExA has directed be provided at Deadline 5). As explained in its other submissions, SLD accepts this as an acceptable way of addressing its (and others') concerns about the scope of permitted preliminary works in principle. However, SLD's comments are reserved behind seeing the detail of the proposed detailed management plan.	The Applicant notes this comment and can confirm that the Permitted Preliminary Works Environmental Management Plan [REP5-106] was submitted at Deadline 5. The Applicant welcomes comments from Stop Lime Down on the Permitted Preliminary Works Management Plan.
SLD1-121	Draft DCO	Article 2(1): "permitted preliminary works" / Schedule 2, Requirement 13(1)	3.1.86. SLD has a residual concern about the definition of "laying of apparatus" in this provision. However, again, this issue may be resolved by the management plan and SLD will comment at the appropriate time.	The Applicant notes this comment, and this has been captured in Table 2-1 of the Permitted Preliminary Works Environmental Management Plan [REP5-106] .

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
SLD1-122	Draft DCO	Article 2(1): "permitted preliminary works" / Schedule 2, Requirement 13(1)	3.1.87. SLD also note that a number of the ExA's questions in ExAQ1 were addressed to this issue and amendments to the Requirements to control for permitted preliminary works. Again, SLD's comments on the need for this will be determined by the form of the permitted preliminary works management plan.	The Applicant notes this comment and can confirm that the Permitted Preliminary Works Environmental Management Plan [REP5-106] was submitted at Deadline 5. The Applicant welcomes comments from Stop Lime Down on the Permitted Preliminary Works Management Plan.
SLD1-123	Draft DCO	Article 7: defence to statutory nuisance	Article 7: defence to statutory nuisance 3.1.88. In its Written Representation [REP1-167], SLD invited further clarification in the Explanatory Memorandum addressing why the defence was required. In [REP2-039] the Applicant stated that it would provide that further explanation, and at [REP4-082] (SLD-067) that an updated explanatory memorandum was provided at Deadline 3. In the most recent Explanatory Memorandum	Please refer to the Applicant's response to DCO1.11 in the Applicant's Response to the Examining Authority's First Written Questions [REP3-128] and to DCO2.6 in the Applicant's Response to the Examining Authority's Second Written Questions [REP5-097] . The effect of Article 7 is to limit the extent of the existing statutory defence to nuisance that the Applicant would otherwise benefit from under s158 of the Planning Act 2008.

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			(Deadline 4), the text on this issue is broadly the same as the original Memorandum (save that further precedent DCOs are provided).	
SLD1-124	Draft DCO	Article 7: defence to statutory nuisance	3.1.89. SLD welcome ExAQ DCO2.7.SLD consider that explanation in the Explanatory Memorandum should be provided if the Applicant intends to maintain Article 7. SLD agrees that, in principle, the existence of the defence appears inconsistent with the provisions managing noise of the Scheme.	Please refer to the Applicant's response to DCO1.11 in the Applicant's Response to the Examining Authority's First Written Questions [REP3-128] , to DCO2.6 in the Applicant's Response to the Examining Authority's Second Written Questions [REP5-097] and DCO2.6 in the Applicant's Response to the Examining Authority's Second Written Questions [REP5-097] . The effect of Article 7 is to limit the extent of the existing statutory defence to nuisance that the Applicant would otherwise benefit from under s158 of the Planning Act 2008.

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SLD1-125	Draft DCO	Article 17: disapplication of s.106 of the Water Industry Act 1991	Article 17: disapplication of s.106 of the Water Industry Act 1991 3.1.90. SLD has raised this issue previously as a result of the ongoing judicial review of the Gatwick Airport DCO. The Court of Appeal has now refused permission to appeal on grounds including a ground related to water discharge, so that the claim is at an end (see R (Barclay) and Another v Secretary of State for Transport and Another [2026] EWCA Civ 1040). As the challenge related to the right to connect to sewers failed, SLD is content that this matter is now resolved.	The Applicant notes this comment.
SLD1-126	Draft DCO	Article 40(4): the addition of "only"	Article 40(4): the addition of "only" 3.1.91. This is addressed above as a specific ExAQ is raised in relation to this.	The Applicant notes this comment.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
SLD1-127	Draft DCO	Article 47(4): "six weeks"	Article 47(4): "six weeks" 3.1.92. SLD remain concerned that six weeks for discharge under this provision is substantially shorter than even the 10 weeks currently provided for in Schedule 16.	Please refer to the Applicant's response to DCO2.13 in the Applicant's Response to the Examining Authority's Second Written Questions [REP5-097] .
SLD1-128	Draft DCO	Schedule 2, Requirement 2(2): construction phasing scheme	Schedule 2, Requirement 2(2): construction phasing scheme 3.1.93. SLD note the terms of Requirement 2(2) which provides that a phasing timetable and plan only be submitted to the Council. As the Council and SLD maintained at ISH4, it is considered that this should also provide for approval of the phasing (to which see also the Council's submission at [REP4 092] para 6.57). As SLD explained in its post-hearing submission [REP4 132], approval was recently required in the Springwell Solar Farm DCO (see para 2.5.20).	Please refer to reference WCD1-018 in the Applicant's Response to Comments Received at Deadline 2 [REP3-129] , which sets out how approval of a phasing plan would not meet the tests for Planning Conditions which also apply to DCO Requirements.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
SLD1-129	Draft DCO	Schedule 2, Requirement 4(3): "first anniversary"	Schedule 2, Requirement 4(3): "first anniversary" 3.1.94. In its Written Representation [REP1-167] SLD requested that the Community Liaison Manager be left in place until the "sixth anniversary" rather than the "first anniversary" of the date of final commissioning. This was because, looking at the oLEMP among other documents, much initial work is conducted in the first five years of the Scheme to ensure that mitigations are properly established and effective (e.g. planting).	The Applicant notes this comment and refers to reference WCD1-019 in the Applicant's Response to Comments Received at Deadline 2 [REP3-129] . The Applicant considers one-year post-construction to be sufficient time for residual community engagement matters to be addressed, and notes that the one-year timeframe is the minimum committed to. It is also noted that a dedicated community contact must remain in-post for the duration of the operational phase.
SLD1-130	Draft DCO	Schedule 2, Requirement 4(3): "first anniversary"	The Applicant's response in [REP2-039] at SLD-426 (repeated in REP4-082] at SLD-073) is, essentially, that the oLEMP and other plans will be monitored and that any concerns can be raised with Wiltshire Council. SLD still consider that it is appropriate to have someone in role that can be directly spoken to at the Applicant,	The Applicant notes this comment and refers to reference WCD1-019 in the Applicant's Response to Comments Received at Deadline 2 [REP3-129] . The Applicant confirms that a dedicated community contact must remain in-post for the

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			to manage concerns that arise. An indirect route is necessarily less effective to resolve concerns about the Scheme (including specific remediation that might be required, e.g. a failing tree), and five years strikes the right balance given the work required at that stage. See also SLD's comments under the Health question above.	duration of the operational phase.
SLD1-131	Draft DCO	Schedule 2, Requirement 5: works beyond Works Nos. 1-3 and 5	Schedule 2, Requirement 5: works beyond Works Nos. 1-3 and 5 3.1.95. In its Written Representation [REP1-167] SLD raised the concern that Works Nos. 4, and 6-10 were not included at all within Requirement 5 (with Works No.5 included to a limited extent). This was highlighted to be different to other recently made DCOs. The Applicant in its response [REP2 039] at SLD-428 stated that these works were excluded because they were subsoil or were controlled by	The Applicant maintains its position as set out in Applicant's Response to Written Representations [REP2-039] (reference SLD-428) and Applicant's Response to Submissions Received at Deadline 3 [REP4-082] (reference SLD-075).

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			other Requirements. At [REP3-173] SLD maintained the point and invited that the Applicant clarify this in the Explanatory Memorandum (or a technical note) if it intended to maintain the position. In its response, the Applicant stated that this is already explained in the Explanatory Memorandum (REP4-082] at SLD-075).	
SLD1-132	Draft DCO	Schedule 2, Requirement 5: works beyond Works Nos. 1-3 and 5	3.1.96. Save for to a limited degree in respect of Works No.5, this is not explained in the text on Requirement No.5 in the Explanatory Memorandum. Given this is a departure from other made DCOs, it is considered the Applicant should explain this approach in respect of each Works Number.	Please see the response to SLD1-131 above. The approach taken in the Draft DCO [REP5-012] has precedent in recently made solar DCOs, including the Cottam Solar Project Order 2024 and the West Burton Solar Project Order 2025, and the Tillbridge Solar Order 2025. The remaining Work Nos. are properly controlled by the other Requirements within Schedule 2, and to list these within Requirement 5 would be duplication.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
SLD1-133	Draft DCO	Schedule 2, Requirement 5: the list of details secured	Schedule 2, Requirement 5: the list of details secured 3.1.97. In its reply to ExAQs [REP3-128] the Applicant pointed to Requirements 10 and 13. This is noted, and it is assumed that the Applicant SLD noted in its WR [REP1-167] that the list of matters to be approved under Requirement 5(1) was shorter than and departed from other made DCOs. This included in relation to (1) refuse and other storage units, signs and lighting; (2) drainage, water, power and communication cables and pipelines; (3) security measures; (4) other mitigation measures for noise (applying the list from the Springwell Solar DCO, excluding items clearly captured by other Requirements).	Please refer to the responses to SLD1-131 and SLD1-132 above. The Applicant notes that the list in sub-paragraph (1) of Requirement 5 in Schedule 2 to the Springwell Solar Farm Order 2026 is identical to the list in sub-paragraph (1) of Requirement 5 in Schedule 2 to the Draft DCO [REP5-012], save that on Springwell there is additionally: <i>(g) refuse or other storage units, signs, CCTV columns and lighting,</i> These matters are all subject to approval under other Requirements within the Draft DCO [REP5-012]. For example, the provisions around lighting are secured within section 2.7 of the Outline CEMP [REP5-071] and must be approved under Requirement 13 of the Draft DCO [REP5-012].

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SLD1-134	Draft DCO	Schedule 2, Requirement 5: the list of details secured	3.1.98. In its reply to ExAQs [REP3-128] the Applicant pointed to Requirements 10 and 13. This is noted, and it is assumed that the Applicant would also rely on Requirement 14 (concerning the oOEMP). SLD recognise that such plans could manage this issue, albeit in those circumstances would welcome the Explanatory Memorandum explaining this further.	The Applicant refers to section 5.2 of the Explanatory Memorandum [REP5-014] , which explains the role of the management plans and, in broad terms, what each management plan controls.
SLD1-135	Draft DCO	Schedule 2, Requirement 20: Applicant's additions concerning "initial date of final commissioning".	Schedule 2, Requirement 20: Applicant's additions concerning "initial date of final commissioning" . 3.1.99. SLD welcome the addition of these provisions which mean that the operational life of the DCO overall is confined to 60 years. SLD now consider that Requirement 20(1)(b) should also be updated so as to tie its lifetime to the initial date of final commissioning as well (which should simplify the drafting of Requirement 20(1)(b). Indeed,	The Applicant does not agree with the proposed drafting amendment. The purpose of Requirement 20(1)(b) is to ensure that the associated development is decommissioned at the same time as the part of the generating station to which they relate. This ensures that, if part of the generating station is decommissioned early, the associated development connected with that part of the authorised development will also

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			Requirement 20(1) might be collapsed to simply "The date of decommissioning for each part of Works 1-3 and 5-10 must be no later than 60 years following the initial date of final commissioning".	be decommissioned at that time. This will always be no later than 60 years after the initial date of final commissioning but may be sooner.
SLD1-136	Draft DCO	Schedule 2, Requirement 20: Applicant's additions concerning "initial date of final commissioning".	3.1.100. SLD note that this does not resolve its separate concern about the piecemeal decommissioning of the Scheme and the lifetime of the option agreements for the land (and whether it can be said that a reasonable worst case for the Scheme has been assessed—see e.g. at para 16.3.2 of [REP1 167] and para 2.1.3 of [REP2-051]).	The Applicant notes this comment and is confident that the reasonable worst case for decommissioning is all parts of the Scheme being decommissioned at the same time, with environmental effects being reduced if decommissioning were to take place at different times for different parts of the Scheme as this would be necessarily less intensive.
SLD1-137	Draft DCO	Schedule 14, Article 8(2): confidentiality of documents etc.	Schedule 14, Article 8(2): confidentiality of documents etc. 3.1.101. In its WR [REP1-167] SLD considered that any materials filed in the arbitration (including the award) should be open and	The Applicant notes this comment and refers to the revised paragraph 8 in Schedule 14 to the Draft DCO [REP5-012] which addresses confidentiality in arbitrations.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			accessible to the public, unless ordered otherwise by the arbitrator, in line with the provision for public hearings in Art 8(1). In its response at [REP2-039] SLD-430 the Applicant stated that some documents could be commercially or otherwise sensitive (and it provided the example of badger sett locations). It said that the default should be confidentiality, with agreement between the parties allowing for that confidentiality to be removed.	
SLD1-138	Draft DCO	Schedule 14, Article 8(2): confidentiality of documents etc.	3.1.102. SLD resisted this [REP3-128] and pointed out that if a specific issue required confidentiality, the arbitrator could order this. SLD had in its WR pointed out that at least some DCOs leave this issue as open (until the arbitrator orders otherwise). The Applicant's response ([REP4-082] at SLD 077) unhelpfully refers back to its original response with no further	The Applicant notes this comment and refers to the revised paragraph 8 in Schedule 14 to the Draft DCO [REP5-012] which addresses confidentiality in arbitrations.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			reasoning. It then goes on to state badgers require protection justifying confidentiality. For the avoidance of doubt, SLD only commented on badgers because the Applicant raised that example in [REP2-039], and this is no answer to leaving confidentiality in the hands of the Arbitrator.	
SLD1-139	Draft DCO	Schedule 14, Article 8(2): confidentiality of documents etc.	3.1.103. In SLD's view, there is no good reason why the default position should not be that all materials are public unless an application is made to the arbitrator and they order that they be confidential. Clearly, for badgers, they would be most likely to order so. However, otherwise, it is appropriate that departures from open justice be in the hands of a decision-maker that can weigh up the competing considerations. The Applicant's position gives no positive reason that confidentiality should be the default (especially	The Applicant notes this comment and refers to the revised paragraph 8 in Schedule 14 to the Draft DCO [REP5-012] which addresses confidentiality in arbitrations.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			when the proceedings themselves are open under Article 8(1)).	
SLD1-140	Draft DCO	Arbitration – confidentiality	3.1.104. Even if SLD's view on a presumption of confidentiality is not accepted, SLD consider that removal of that confidentiality should be on application to the arbitrator and not turn on agreement of the parties. If it turns on agreement, each party has an absolute veto which is not appropriate.	The Applicant notes this comment and refers to the revised paragraph 8 in Schedule 14 to the Draft DCO [REP5-012] which addresses confidentiality in arbitrations.
SLD1-141	Draft DCO	Schedule 16 – time periods	Schedule 16: time periods 3.1.105. SLD in its original WR [REP1-167] raised concerns about the shortness of the time periods in Schedule 16 for the Council to act. The principal time period for discharge has been changed to 10 weeks in more recent drafts. However, SLD understands that the Council seeks further extension of the relevant time periods [REP4-092] section 2.10. SLD supports this given the various provisions in	The Applicant notes this comment and refers to reference WCD1-032 in the Applicant's Response to Comments Received at Deadline 2 [REP3-129] . The Applicant considers 10 weeks to be suitable to balance the Council having sufficient time to consider applications with the efficient delivery of the Scheme.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			Schedule 16 have deemed discharge provisions.	
SLD1-142	Draft DCO	Suggested requirements in LIR	Council suggested requirements in the Local Impact Report [REP1-137] 3.1.106. In its LIR the Council advanced a number of further requirements and provisions for the DCO. In its Deadline 2 submission [REP2-051] SLD identified a number of these and expressed its support (e.g. for the provision of a business survey, response plan, and fund). [REP2-051]. SLD continue to support the requirements and provisions which the Council suggest, while noting that some of these may be more appropriate for provision in the outline plans. SLD will consider the Council's answer to DCO2.1 in this regard.	The Applicant notes this comment.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
SLD1-143	Draft DCO	Changes to Management Documents	<i>DCO2.1 Outline any remaining or residual issues that you have with any of the management plans/ documents listed below, set out why the applicant has not yet resolved your concerns or why you are not content with the applicant's justification, and define what remedy or solutions or amendments you are seeking to address your concerns within the drafting of the relevant management plan(s)/ document(s):</i> <u>DCO2.1– Changes to the Management Documents</u> 3.1.107. In the second instance, the parties are invited to “Outline any remaining or residual issues that you have with any of the management plans/ documents listed below, set out why the applicant has not yet resolved your concerns or why you are not content with the applicant's	Included for context and does not require response.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			justification, and define what remedy or solutions or amendments you are seeking to address your concerns within the drafting of the relevant management plan(s)/ document(s)..." SLD's comments on the relevant management plans and documents are set out in the table below.	
SLD1-144	Draft DCO	Outline Construction Environment Management Plan	<u>Generally</u> 3.1.108. Paragraph 3.4: when outlining EcoCoW responsibilities, it should be highlighted that supervision will be required during sensitive phases of highway improvement works as well, namely measures such as partial hedgerow clearance for visibility splays, as these tasks are not strictly associated with the PV fields or CRC works, but still carry a potential for significant ecological impacts.	The Applicant notes Stop Lime Down's comment and confirms that additional text has been included within the Outline EPMS [REP5-081] submitted at Deadline 5 to clarify that sensitive working methods apply also during highway improvement works, included within Method Statement 13 in relation to dormice. The Applicant confirms that all relevant ecological mitigation measures set out within the Outline EPMS [REP5-081] will also be applied

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				to Highway Improvement Areas during construction.
SLD1-145	Draft DCO	Outline Construction Environment Management Plan	3.1.109. Paragraph 2.1.1 (ninth bullet point):SLD suggest that text is added to make clear that the date of final commissioning relates to the final part of the authorised development. The same applies to Schedule 2, req 4(2) of the draft DCO. This is because the definition in the DCO would appear to accord with any energy generation commencing being the “date of final commissioning”, rather than the last part of the Scheme commencing generation.	The Applicant notes this comment and has amended the Outline CEMP [EN010168/APP/7.12] (Revision 7) to clarify this matter.
SLD1-146	Draft DCO	Outline Construction Environment Management Plan	3.1.110. Para 2.14.1: a single display board for the entire site appears to be small for a site of this size. In respect of the logbook of complaints, SLD suggests that this should be made available to Wiltshire Council at regular intervals.	The Applicant confirms that reference to ‘a display board’ has been updated in the Outline Construction Environmental Management Plan [EN010168/APP/7.12] (Revision 7) submitted at Deadline 6. The location of these boards will be confirmed within the

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Stakeholder Communications Plan that is required to be prepared under the Outline CEMP [REP5-071]. These details will be agreed with Wiltshire Council (and where suitable, the Community Liaison Group) through the discharge of Requirement 13 of Schedule 2 to the Draft DCO [REP5-012]. The mechanism and frequency for publication of the logbook of complaints (directly with Wiltshire Council, or by their representative(s) in the Community Liaison Group) can also be agreed through the discharge of Requirement 13.
SLD1-147	Draft DCO	Outline Construction Environment Management Plan	3.1.111. Table 3: SLD's ecology expert has already expressed concerns that the EcoCoW's role has significant difficulties in light of the lack of surveys and also pressure to allow work to proceed (particularly in the CRC). While the	The Applicant notes this comment regarding potential pressures on the appointed Ecological Clerk of Works during construction and has provided a response on this matter in response to SLD1-014 above.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			monitoring requirements provide for surveys to account for "seasonality constraints", SLD's expert has already explained how significant the delays could be as a result of this surveying.	
SLD1-148	Draft DCO	Outline Construction Environment Management Plan	3.1.112. Table 5: given the length of the suggestions, this is addressed below.	The Applicant notes this comment.
SLD1-149	Draft DCO	Outline Construction Environment Management Plan	3.1.113. Table 6: SLD would have concern about the use of strip, map and sample on any archaeological asset where it would give rise to a significant effect in EIA terms (given SLD's analysis in its Appendix C of its WR). Where that is the case the preference must always be for the other option identified in the Table: "no solar development". SLD consider also that the Applicant should have to report on a regular basis complaints received to the Council.	As stated in paragraph 12.9.10 of ES Volume 1, Chapter 12: Cultural Heritage [APP-064] and paragraph 4.1.1 of ES Volume 3, Appendix 12.6 Archaeological Mitigation Strategy [APP-230] , where possible there will be a preference to conserve archaeological remains in situ. Where this is not achievable, the Applicant considers mitigation by record to also form appropriate approach to archaeological

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			There should be provision for detailed archaeological briefing.	mitigation (i.e. strip, map and sample). As stated in Section 15 of the Archaeological Mitigation Strategy [EN010168/APP/6.3] (Revision 2) <i>"The Archaeological Advisor to the relevant Local Planning Authority will monitor the implementation of the archaeological mitigation works and evaluate the scope and progress of the work against the methodology detailed in the AMS"</i>.
SLD1-150	Draft DCO	Outline Construction Environment Management Plan	3.1.114. Table 8: SLD note there is extensive use in this table of the formulation <i>"as far as practicable"</i> . For example, avoiding combined noise effects on sensitive receptors or a 250m distance for construction compounds from residential receptors <i>"as far as practicable"</i> . SLD consider that a higher standard should be required, such as <i>"save for exceptional</i>	The text aligns with Section 72 of Control of Pollution Act, which defines Best Practicable Means and states that <i>"practicable"</i> means <i>"reasonably practicable"</i>. The reporting of complaints, together with resulting actions, and prior agreement with local authorities, is covered in Section

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			circumstances". Consider also that the Applicant should have to report on a regular basis complaints received to the Council.	6.2 of the Outline CEMP [REP5-071] .
SLD1-151	Draft DCO	Outline Construction Environment Management Plan	3.1.115. Table 10: SLD note suggestions of the Council on socioeconomics and the provision of funds to ameliorate effects. This would be welcome.	The Applicant notes this comment and has set out its position in its response to question SE2.1 and SE2.3 in The Applicant's Response to the Examining Authority's Second Written Questions [REP5-097]. The Applicant does not agree that such a compensation scheme is proportionate to the likely effects the Scheme will have on local business, given the level of mitigation measures secured through the DCO.
SLD1-152	Draft DCO	Outline Construction Environment Management Plan	3.1.116. Table 11: On cable depth, an approach of "impracticable" is considered too low a test where the viability of farming the land is in issue. This matter should be approached on an exceptionality basis to ensure that land is not	The Outline CEMP [REP5-071] includes control measures to ensure the land in the Cable Route Corridor is not sterilised from use. For example, the cable depth will be communicated to the landowner following ground

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			sterilised from use. As is discussed below, SLD also have significant concerns about soil storage and earthwork mounds.	investigations, and a pre-construction record of condition will be produced for comparison post-construction to ensure that the standard of reinstatement at least meets that recorded in the pre-condition survey.
SLD1-153	Draft DCO	Outline Construction Environment Management Plan	3.1.117. Table 17: SLD consider that clarity on "where required" should be provided as it is currently unclear in what circumstances some of the proposed mitigations will be used.	The measures outlined in Table 17 of the O Outline CEMP [REP5-071] each include reference in parentheses to the specific fields where these measures have been incorporated. For the area in field C14 where fixed south facing panels will not be used, this is also shown in Figure 37 (page 77) of ES Volume 3: Appendix 20-4 Solar Photovoltaic Glint and Glare Study [APP-261].
SLD1-154	Draft DCO	Outline Construction Environment	3.1.118. Section 6.2: SLD consider that the records produced should be made available to the Council at regular intervals.	The Applicant notes this comment and will discuss this with the Local Authority.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		Management Plan		
SLD1-155	Draft DCO	Outline Construction Environment Management Plan	<u>Table 5: Hydrology, Flood Risk and Drainage</u> 3.1.119. SLD is concerned that the strategy proposed by the Applicant to monitor water quality during and after construction is inadequate for identification and remediation of problems. It is stated that the strategy "will be based on a combination of visual observations and reviews of the Environment Agency's automatic water quality monitoring network". This is inadequate because: • The Environment Agency does not have an automatic water quality monitoring network; • Visual observation is dependent on the presence of a trained observer at the site of a pollution incident. At best this will only occur during working hours, whereas	The Applicant does not agree that the proposed water quality monitoring strategy is inadequate. SLD's comment focuses on one sentence and does not reflect the wider monitoring and incident-response framework within the Outline CEMP [REP5-071]. Table 5 already requires pre-construction, construction and post-construction water quality monitoring comprising visual inspections and risk-based on-site measurements and sampling where appropriate. Monitoring will be undertaken regularly, with increased frequency during higher-risk activities such as earthworks and concrete works. Where sampling is required, MCERTS methods will be used where applicable and laboratory

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			incidents can occur at any time, including at night. It is unsystematic and hard to document.	analysis undertaken by UKAS-accredited laboratories. Visual inspection is therefore not the sole means of identifying a pollution event. It forms part of a wider system of preventative controls, on-site monitoring, incident response, inspections and corrective action. The Outline CEMP [REP5-071] also requires trained personnel, spill-response equipment, an Emergency Spillage Plan and immediate notification of suspected pollution incidents to the Environment Agency. Sections 5 and 6 establish Environmental Manager responsibilities, inspections, audits, records and corrective action. The Applicant notes SLD's comment regarding the reference to the Environment Agency's automatic water quality

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				monitoring network. The effectiveness of the Scheme's monitoring strategy does not depend upon such a network. The detailed Water Management Plan will establish the monitoring locations, parameters, frequencies, methods and trigger levels required for the Scheme itself.
SLD1-156	Draft DCO	Outline Construction Environment Management Plan	3.1.120. The Applicant is proposing to monitor high-risk areas more intensively during construction which is reasonable.	The Applicant welcomes SLD's agreement that increased monitoring of higher-risk construction activities is reasonable. This approach is already reflected within the Outline CEMP [REP5-071], which requires increased monitoring frequency during periods and activities presenting a higher water-quality risk.
SLD1-157	Draft DCO	Outline Construction Environment	3.1.121. Important detail, without which the adequacy of the sampling cannot be assessed, is	The Applicant does not agree that the monitoring approach relies upon laboratory spot

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		Management Plan	delegated to the currently non-existent Water Management Plan. However, the Applicant clearly intends to take spot samples and send them to a laboratory for analysis. This is far too slow to allow remedial action to be taken. There is a reliance on visual assessment which is subject to the same problems discussed above. The criteria for deciding what is "appropriate" or "proportionate" are not stated, nor who is to take these decisions.	sampling as the means of identifying and responding to pollution incidents. The Outline CEMP [REP5-071] provides for visual inspections and risk-based on-site measurements as well as sampling where appropriate. On-site observations and measurements can therefore inform immediate investigation and corrective action, with laboratory analysis providing additional verification where required. Pollution incident response is separately governed by the preventative and emergency procedures within the CEMP and is not dependent upon receipt of laboratory results. The detailed Water Management Plan will define monitoring locations, parameters, frequencies, methods and trigger levels proportionate to the

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				construction activity and sensitivity of the receiving environment. This detail is appropriately established once the final construction sequence, active working areas and relevant source-pathway-receptor relationships are known. The overarching governance and corrective-action framework is addressed in DCO2.1y.
SLD1-158	Draft DCO	Outline Construction Environment Management Plan	3.1.122. Stop Lime Down proposes an alternative monitoring strategy which will address these problems. Automated continuous water analysis is becoming increasingly common and affordable. Commercial instruments (e.g. YSI's EXO system) are available which will make continuous measurements of certain pollutants in flowing waters, transmit the data to a remote operator, and sound alarms if thresholds are exceeded. The entire Lime Down PV site could be monitored by such an	The Applicant notes SLD's suggested use of continuous automated monitoring but does not agree that this should be prescribed as a Scheme-wide requirement. The proposed monitoring approach is consistent with the applicable pollution-control framework and Environment Agency guidance. The Environmental Permitting (England and Wales) Regulations 2016 regulate the discharge of

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			installation on just four streams: the Rodbourne Brook, the Gauze Brook, the Norton Brook, and the "un-named watercourse" west of Foxley. This would provide early warning of problems on site, allowing them to be investigated and remediated quickly, and provide evidence of compliance with standards or otherwise. Mobile versions of these systems could be used closer to sites of active construction, including the cable route. They would not be dependent on the random presence of observers and monitor problems day and night.	polluting matter to the water environment but do not prescribe continuous receiving-water monitoring as a standard requirement. Current Environment Agency pollution-prevention guidance for construction instead places the emphasis on assessing and minimising pollution risk, controlling pollutants at source, preventing contaminated runoff reaching watercourses, treating contaminated water where required and maintaining appropriate incident-response arrangements. Environment Agency monitoring guidance also recognises both periodic and continuous monitoring techniques, with the appropriate method selected having regard to the determined being assessed and the regulatory purpose of the monitoring. Continuous

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				monitoring is therefore one available technique rather than a default regulatory requirement. This is reflected in the Outline CEMP [REP5-071], which adopts a risk-based approach combining preventative controls, inspection, on-site measurements, targeted sampling and incident response, with more intensive monitoring during higher-risk activities. The detailed Water Management Plan will define the monitoring locations, parameters, frequencies, methods and trigger levels having regard to the actual construction activities and sensitivity of the receiving environment. The Applicant does not rule out automated or continuous monitoring where the detailed risk assessment identifies that it would provide a proportionate benefit at a particular sensitive

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				location or during a particular activity. However, prescribing permanent monitoring installations on four predetermined watercourses irrespective of the location and nature of construction activity would go beyond the approach required by the applicable regulatory framework and would not necessarily provide a more effective means of preventing pollution.
SLD1-159	Draft DCO	Outline Construction Environment Management Plan	3.1.123. Additionally, water quality monitoring should have a more established period as it is vague and unspecified currently. Particularly pertinent in construction although query whether it should extend to lifetime of scheme.	The Applicant does not agree that a fixed lifetime monitoring period is necessary or proportionate. The Outline CEMP [REP5-071] requires water quality monitoring before and during construction and for an appropriate period following construction. The detailed Water Management Plan will define the duration and frequency having regard to the

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				activities undertaken, receptor sensitivity, reinstatement and the period necessary to demonstrate that construction-related effects have ceased. This risk-based approach is consistent with the pollution-control framework, which requires monitoring and controls to be proportionate to the relevant pollution risk rather than continued indefinitely irrespective of whether a source-pathway-receptor relationship remains. Operational water quality risks are separately addressed through the OEMP [REP5-073]. The Applicant therefore does not consider that construction-related water quality monitoring should automatically extend for the lifetime of the Scheme.
SLD1-160	Draft DCO	Outline Operational Environment	<u>Noise</u>	The Applicant is committed to mitigating and minimising above LOAEL within the context of

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		Management Plan	3.1.124. Outstanding issues are that the applicants noise monitoring, and ES assessment did not adequately capture or take proper account of the low background levels. Consequently, the adopted LOAEL and SOAEL thresholds may well produce higher noise impacts to local residents than as presented in the ES. Table 9 does not provide for mitigating below LOAEL and instead adopts figures which are just below SOAEL. SLD consider, in line with its main submissions on noise, that a focus on mitigating to LOAEL could be included in the oOEMP.	sustainable development and their latest position is outlined in the Applicant's Response to the ExA's Second Written Questions [REP5-097] , item NE2.4.
SLD1-161	Draft DCO	Outline Operational Environment Management Plan	<u>Human Health</u> 3.1.125. Table 12 proposes that a Community Liaison Manager should be appointed as a temporary facilitator of communications between communities and the Scheme's operators during the peak	The Applicant considers that the appointment of a full-time member of the Scheme's operation and maintenance team in the role of a dedicated 'community contact' position would have suitable scope to be "responsible for monitoring community interaction to ensure

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			replacement scenario. This currently provides for the CLM to be in place during the peak replacement scenario. SLD consider that the CLM should be in place for battery replacement also.	community concerns are heard, responded to and suitably addressed" (Table 12, Outline Operational Environment Management Plan [REP5-073]) during BESS replacement activities. This is secured by Requirement 14 of Schedule 2 to the Draft DCO [REP5-012] . Information about upcoming BESS replacement works can also be distributed to the community through legacy measures of the Stakeholder Communication Plan as set out for construction (secured through the Outline CEMP [REP5-071] by Requirement 13 in the Draft DCO [REP5-012]).
SLD1-162	Draft DCO	Outline Operational Environment Management Plan	3.1.126. SLD understand that the Council has proposed a fund to help address the economic effects of the Scheme on businesses. SLD agree with this proposal.	The Applicant notes this comment and has set out its position in its response to question SE2.1 in The Applicant's Response to the

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Examining Authority's Second Written Questions [REP5-097]. The Applicant does not agree that such a compensation scheme is proportionate to the likely effects the Scheme will have on local business, given the level of mitigation measures secured through the DCO.
SLD1-163	Draft DCO	Outline Operational Environment Management Plan	<u>Glint and Glare</u> 3.1.127. As with the oCEMP, SLD consider that, for Table 17, clarity on "where required" should be provided as it is currently unclear in what circumstances some of the proposed mitigations will be used.	As with the above response, field numbers are included in parentheses for each measure.
SLD1-164	Draft DCO	Outline Decommissioning Strategy	3.1.128. As SLD have stated elsewhere, it has significant concerns about the piecemeal decommissioning of the Scheme. Notwithstanding this, however, if the Applicant is going to provide for this, the oDS should have a clear section addressing how such	The Applicant notes this comment. Requirement 20(4) in the Draft DCO [REP5-012] requires that the decommissioning plan submitted for approval must include a timetable for its implementation which addresses this concern.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			decommissioning will be undertaken, and the relationship of such land to the remainder of the Scheme.	
SLD1-165	Draft DCO	Outline Decommissioning Strategy	3.1.129. The oDS should also provide for abiding by regulations and guidance which changes to become more stringent by the time of decommissioning. See, for example, para 2.7.2 which currently is formulated so that the 2011 and 2005 Regulations are said to apply. This should be made clearer notwithstanding the general comment about following regulations and guidance at the time at para 3.1.2.	The Applicant considers it appropriate to include reference to the current regulatory framework so that there is no doubt that, for example, waste must be managed in accordance with the wider regulatory framework (as opposed to provision being made solely within the DCO). The effect of paragraph 3.1.2, combined with the detailed decommissioning plan needing to be substantially in accordance with the Outline Decommissioning Strategy [REP5-075] is to make it clear that the regulatory framework in place at the point of decommissioning is to apply.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
SLD1-166	Draft DCO	Outline Decommissioning Strategy	3.1.130. Para 2.10.1: As with oCEMP, one display board is insufficient. Similarly, as was expressed on the oCEMP, the logbook should be shared with the Council.	The Applicant confirms that reference to 'a display board' has been updated in the Outline Decommissioning Strategy [EN0160168/APP/7.14] (Revision 5) submitted at Deadline 6. The location of the boards would be confirmed within the Stakeholder Communications Plan that is required to be prepared under the Outline Decommissioning Strategy [REP5-075]. These details will be agreed with Wiltshire Council (and where suitable, the Community Liaison Group) through the discharge of Requirement 20 of Schedule 2 to the Draft DCO [REP5-012]. The mechanism and frequency for publication of the logbook of complaints (directly with Wiltshire Council, or by their representative(s) in the

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Community Liaison Group) can also be agreed through the discharge of Requirement 20.
SLD1-167	Draft DCO	Outline Decommissioning Strategy	3.1.131. In respect of ecology, SLD welcome the proposed carrying out of a new set of ecological surveys and re-assessment of the mitigation measures necessary prior to the eventual decommissioning of the scheme in Table 3. SLD would welcome a clearer commitment to complete these surveys, as opposed to the "expectation" currently proposed.	The Applicant notes this comment and confirms that the measures proposed within the Outline Decommissioning Strategy [REP5-075] , including completion of update ecological surveys, will be secured via DCO Requirement through production and implementation of a detailed Decommissioning Strategy.
SLD1-168	Draft DCO	Outline Decommissioning Strategy	3.1.132. Table 8: as with the oCEMP, SLD note there is extensive use on this table of the formulation "as far as practicable". For example, avoiding combined noise effects on sensitive receptors or a 250m distance for decommissioning compounds from residential receptors. A higher test should be applied.	The text aligns with Section 72 of Control of Pollution Act, which defines Best Practicable Means and states that "practicable" means "reasonably practicable".

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
SLD1-169	Draft DCO	Outline Decommissioning Strategy	3.1.133. Section 6.2: the records should be made available to the Council at regular intervals.	The Applicant notes this comment. Paragraph 6.2.3 requires quarterly reporting to the relevant planning authority throughout the decommissioning phase.
SLD1-170	Draft DCO	Outline Soil Resources Management Plan	3.1.134. Paragraph 1.7.2: SLD has concerns in respect of the health and quality of soil that is stockpiled for long periods. It is presently unclear how the health of the soil would be maintained during this period. The extent and location of the stockpiling is also unclear. The extent of provision is specified in 1.8.3 (bullet point 9 and 10) but it is unclear how this does enough to actually maintain soil health and fertility.	The Applicant acknowledges that the process of excavating and stockpiling soils will disrupt the established soil structures and may initially be detrimental to soil health. However, soils will be stockpiled according to best practice, and long-term soil stockpiles will be seeded with an appropriate seed mix. The vegetation will be able to root into the stockpiles enabling continued aeration as well as water and nutrient cycling. Much of the stockpiled soil will remain biologically active throughout the operation of the Scheme.
SLD1-171	Draft DCO	Outline Soil Resources	3.1.135. Section 1.8: It is unclear whether more stringent handling	Best practice set out in Defra's Construction Code of Practice for

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		Management Plan	rules could be applied to manage the issue of sensitive soils being handled in wet conditions. Para 1.8.14 should arguably be framed to more positively indicate against the handling of wet soils this all seems currently to be left to discretion.	the Sustainable Use of Soils on Construction Sites includes a multi-step protocol for handling wet soil (which is referenced in paragraph 1.8.7) but ultimately, it must still be stockpiled when dry. Paragraph 1.8.14 specifies that handling decisions will be made on the actual wetness state of the soil in relation to the full context of Section 1.8 which applies throughout.
SLD1-172	Draft DCO	Outline Soil Resources Management Plan	3.1.136. Paragraph 1.8.7: The plan states that " <i>the subsoils will not be disturbed</i> ". However, anywhere where there is piling taking place to install the panel supports, both topsoil and subsoil will be disturbed, firstly by the action of piling but also the driving of the equipment over the soils to get to the panel positions causing compaction. Likewise, at decommissioning, the same disturbance will occur and that	Additional details on monitoring of the soil for signs of damage and compaction during construction, and on methods of investigating suspected compaction have been included in the Outline SRMP [REP5-077] .

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			caused by pulling out of the piles could well be worse than at installation. The Applicant has not provided evidence in support of its assertion that the soils will not be structurally damaged by the installation and removal of panels. How this aspect of the oSRMP will be met should be explained by the Applicant.	
SLD1-173	Draft DCO	Outline Soil Resources Management Plan	3.1.137. Paragraphs 1.8.22-1.8.25: As above, detail on stockpiling is very limited. Given the length of the Scheme there is no engagement with how fertility is going to work over this period. Also no consideration of location as this is left to detailed assessment.	Refer to the response to SLD1-170. While nutrient cycling will continue due to vegetation rooting into the soils, there is no imperative for high fertility to be maintained in stockpiled soils. On the contrary, too much organic matter in stockpiled soils is detrimental as it becomes subject to anaerobic decay which is harmful to soil health. It is more appropriate for stockpiled soils seeded with grass and/or wildflowers to be in a low-fertility

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				state in the long-term, with nutrient amendments being made on soil reinstatement as necessary. The locations and dimensions of stockpiles will be determined at detailed design stage, however, it is envisaged that the soils will be distributed around the Solar PV Sites, including at the substations, in multiple stockpiles and bunds.
SLD1-174	Draft DCO	Outline Soil Resources Management Plan	3.1.138. Paragraph 1.8.37: This paragraph suggests that monitoring will pick up any compaction from machinery during installation, and machinery will be employed to relieve it. However, there is no indication of approach. Likewise, ideally compaction should be avoided rather than depending on remediation.	Refer to response to SLD1-172.
SLD1-175	Draft DCO	Outline Soil Resources	3.1.139. There is also no mention of an aftercare period and commitment to rectify problems up	Refer to response to SLD1-172.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		Management Plan	to 5 years after reinstatement/decommissioning. It has to be remembered that many of these soils are of high sensitivity and low resilience to structural damage so need considerable care.	
SLD1-176	Draft DCO	Outline Public Rights of Way and Permissive Paths Management Plan	3.1.140. Paragraph 3.2.1 (bullet point 4): It is unclear how ensuring that PRow users will always have right of Ways against vehicles associated with the Scheme is secured. See also 3.3.3 on this issue.	The Applicant reaffirms that all construction workers and delivery drivers, will be briefed to adopt safe driving behaviour around non-motorised highway users and PRow users. This is set out in the Outline CTMP [REP5-083] (secured Requirement 15 of Schedule 2 to the Draft DCO [REP5-012]). Onsite signage will also be used to communicate the need to give way to PRow users, as will direction from banksmen at site entrances or locations where HGV movements need to be more strictly controlled, as secured through the Outline Public Rights of Way and Permissive Paths Management

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Plan [REP1-104] by Requirement 16 of the Draft DCO [REP5-012]. Any complaints or concerns can be directed to the Community Liaison Manager as secured through the Outline CEMP [REP5-071] by Requirement 13 of Schedule 2 to the Draft DCO [REP5-012].
SLD1-177	Draft DCO	Outline Public Rights of Way and Permissive Paths Management Plan	3.1.141. Paragraph 5.1.4: SLD consider that there should be provision of information to locals advertising the end of the availability of permissive paths.	Communication and information sharing with the local community will be undertaken ahead of decommissioning through the re-establishment of the Community Liaison Group (as secured through the Outline Decommissioning Strategy [REP5-075] and the specific wording of Requirement 20(2)(b) in Schedule 2 to the Draft DCO [REP5-012]. The relevant closure dates of permissive paths can therefore be communicated through this channel.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
SLD1-178	Draft DCO	Outline Landscape and Ecological Management Plan	3.1.142. Paragraph 1.3.9: SLD has already raised concerns that direct drilling of wildflower into the stubble of the previous arable crop is likely to be unsuccessful due to the residual fertility in the soils. The Applicant should explain in the oLEMP how it will seek to achieve effective growth of wildflower in such circumstances, as SLD consider this to be a flaw in its approach.	The Applicant notes this comment. The Applicant acknowledges that soil fertility can impact the successful establishment of diverse grasslands when not appropriately considered. Within the Outline LEMP [REP5-079] (Revision 3), soil testing is specified prior to grassland seeding to assess factors such as soil type, pH and nutrient levels. The results of these investigations will be used in the selection of appropriate grassland seed mixes and/or soil preparation or remedial management measures that may be required ahead of seeding which represents widely adopted best practice. The outcomes and associated measures will be presented within the detailed LEMP, to be secured via Requirement 7 in Schedule 2 of the Draft DCO [REP5-012] .

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
SLD1-179	Draft DCO	Outline Landscape and Ecological Management Plan	3.1.143. Paragraphs 1.3.120-1.3.121: Depending on findings of follow-up white clawed crayfish surveys and inspections, further mitigation in the form of planting location and species selection may need to be taken into account. Where relevant, additional landscaping considerations must be made for long-term ditch management and planting along relevant sections, considering factors such as, but not limited to, overshadowing or increase in leaf litter.	The Applicant notes this comment. Should white-clawed crayfish be identified during pre-commencement inspections, any necessary additional mitigation measures would be considered and implemented where proportionate and justified as set out in the response to SLD-058 above. However, the Applicant does not consider that amendments to the proposed landscaping strategy are likely to be required. The landscaping proposals have been designed having regard to the presence or assumed presence of species and the long-term management requirements for watercourse features. The Applicant considers that the location and specification of planting, together with the management measures set out within the Outline LEMP [REP5-079] relevant provide an

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				appropriate balance between ecological enhancement and maintaining existing aquatic and riparian habitats and conditions. Should site-specific circumstances be identified during pre-construction surveys for white-clawed crayfish, or indeed any other species, these can be accommodated through minor refinements to the management measures set out in the Outline LEMP [REP5-079] and through the detailed design process, where required and justified.
SLD1-180	Draft DCO	Outline Landscape and Ecological Management Plan	3.1.144. Paragraphs 1.3.30, 1.3.45, 1.3.55 and 1.3.65: SLD has raised concern about how this watering described in these paragraphs will be achieved and whether it will be successful. It is unclear what is a reasonable worst case for the extent of watering to be required, and whether that might have	In accordance with the Outline LEMP [REP5-079] , newly planted trees and shrubs will be watered as necessary during the first growing season following planting to support successful establishment. The extent of any watering requirements will depend on prevailing weather

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			environmental effects (e.g. the need for water tankers to regularly drive around the area).	conditions, particularly rainfall levels during the establishment period. As with other operational water requirements associated with the Scheme, water would be sourced either from a suitably licensed local abstraction source and transported to the Solar PV Sites for storage and use on site, or from the mains water network where this is available. The Applicant therefore considers that the limited and temporary water requirements associated with the establishment of planting can be adequately accommodated through the proposed water supply arrangements. Given the scale and duration of these requirements, and the availability of suitable water sources, the Applicant does not consider that the watering of newly planted trees and shrubs would give rise

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				to any significant adverse environmental effects.
SLD1-181	Draft DCO	Outline Landscape and Ecological Management Plan	3.1.145. Paragraph 1.3.140: Updated calculations reporting the expected increase in number of skylark territories as a result of the latest proposed enhancements should be included, serving as long-term management targets.	The Applicant notes this comment and confirms that the discrepancy between the quantum of ground nesting bird mitigation habitat proposed will be corrected in an updated version of the Outline LEMP [REP5-079] submitted at Deadline 6.
SLD1-182	Draft DCO	Outline Landscape and Ecological Management Plan	3.1.146. Paragraphs 1.3.136–1.3.146;1.4.3: As one of the major sources of both short- and long-term impact expected from the proposal, and a central part of its mitigation strategy, follow-up skylark monitoring (and other ground-nesting, agricultural land specialists in general) should be distinct from broader, general bird monitoring surveys proposed.	The Applicant notes this comment. Further details of monitoring of skylark mitigation habitats at the Solar PV Sites will be provided within the detailed LEMP document (to be prepared in consultation with Wiltshire Council) in which a detailed ecological monitoring strategy will be provided and secured via Requirement 7 in Schedule 2 of the Draft DCO [REP5-012] . The Applicant considers the post-consent detailed design stage to

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				be the appropriate point at which these measures are defined, as this will enable the mitigation strategy to be informed by the final scheme design and site conditions. This plan will include clear monitoring requirements.
SLD1-183	Draft DCO	Outline Landscape and Ecological Management Plan	3.1.147. Skylark monitoring should be based on number of territories, with expected, broad uplift targets set at regular intervals within the years following the development (for example: year 1, 2, 4, 6, 8). Should territory counts be found to be falling below the expected increase value, or worse broadly decreasing, this should trigger re-assessment of the LEMP and landscape management practice to correct this, followed by monitoring in the immediately following years.	The Applicant notes this comment. Further detail relating to adaptive skylark mitigation will be provided in the detailed Operational Environmental Management Plan (OEMP) and detailed Landscape and Ecological Management Plan (LEMP) documents which will be prepared in consultation with Wiltshire Council. The Applicant considers the post-consent detailed design stage to be the appropriate point at which these measures are defined, as this will enable the mitigation strategy to be informed by the final scheme design and site conditions. These plans will include clear success

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				criteria, monitoring requirements, and triggers for the implementation of remedial measures, including specified habitat condition targets. The Applicant considers the number of territory counts present within the mitigation areas to be an inappropriate metric for triggering adaptive management measures. This is because skylark breeding occupancy within any given year is influenced by a range of factors that are beyond the Applicant's control. These include, but are not limited to, weather conditions, overwinter survival rates, and the land-use changes, cropping regimes and agricultural practices adopted within the wider surrounding landscape. Consequently, the appropriate trigger for adaptive management

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				should be an assessment of whether the mitigation areas are providing suitable habitat conditions for breeding skylark, rather than the presence or number of territories recorded in any particular year. The ecology of skylark in lowland farmland settings is well understood and the habitats proposed within the mitigation areas represent what is currently regarded as optimal breeding habitat for skylark, based on the available evidence base, published research, and relevant best-practice guidance. Adaptive management measures should therefore comprise changes to the method and timing of habitat management within the delineated area, to be informed by monitoring evidence on habitat quality, condition, or management objectives are not being achieved, rather than fluctuations in skylark numbers

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				that may arise from external factors beyond the Applicant's influence.
SLD1-184	Draft DCO	Outline Landscape and Ecological Management Plan	3.1.148. Once the overall uplift targets are met after this initial monitoring cycle, the frequency of skylark territory counts can decrease to once every five years, for example, with additional visits following any major changes in management action or if a significant decrease in territories is observed. It is important to note that the proposed skylark enhancements are a core part of the Scheme's mitigation following displacement of the species; failure to ensure and confirm an increase in territory uplift would be a failure of this mitigation as a whole, further increasing the already expected significant displacement resulting from the proposal.	The Applicant notes this comment and refers to the response provided above in relation to the use of territory counts as a measure of mitigation success. The Applicant considers that territory counts alone do not provide an appropriate basis for assessing the effectiveness of the proposed mitigation, as they can be influenced by a range of factors unrelated to habitat suitability or the performance of the mitigation measures themselves.
SLD1-185	Draft DCO	Outline Landscape and	3.1.149. Paragraph 1.4.4: As a species sensitive to silting and	The Applicant notes this comment and maintains that the

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		Ecological Management Plan	pollution impacts, white clawed crayfish should be included as well as a species indexed for additional follow-up monitoring, particularly shortly post-development, to confirm it has not been unexpectedly impacted negatively during construction. Findings should trigger and inform remedial site management action, if so required.	avoidance and mitigation measures set out within the Outline EPMS [REP5-081] are sufficiently precautionary to avoid potential adverse impacts to white-clawed crayfish during construction. Construction-phase monitoring set out within Method Statement 16 of the Outline EPMS [REP5-081] will ensure compliance with all relevant measures, and inform remedial actions if required. No further monitoring relating to white-clawed crayfish is proposed.
SLD1-186	Draft DCO	Outline Ecological Protection and Mitigation Strategy	3.1.150. Paragraph 3.3.5: Amend to ensure larger gaps (200mmx 200mm) along the fence base, bringing these more in line with standard wildlife gate size specifications. Ensure gaps are present across the various sections of Solar PV fencing, preferably with higher frequency along roadside sections.	The Applicant notes this comment and has responded on this matter in the relevant responses to SLD1-019 to SLD1-026 above.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
SLD1-187	Draft DCO	Outline Ecological Protection and Mitigation Strategy	3.1.151. Paragraphs 14.1–14.3: If not carried out at the examination stage, full nest tube/footprint tunnel dormouse surveys should be conducted well prior to works commencing. Results should inform the mitigation approach adopted within the eventual, finalised EPMS, with measures including but not limited to: securing relevant licences, wider implementation of horizontal drilling at sensitive hedgerow crossings, avoidance of works within particular hedgerows entirely, clearing particular sections under a two-stage clearance and/or identification of low-risk sections which can be safely cleared even outside the narrow seasonal window for single-stage clearances. The above measures should be incorporated alongside the already-outlined schedule of toolbox talks and pre-clearance searches.	The Applicant notes this comment and maintains that the avoidance and mitigation measures for dormice set out within the Outline EPMS [REP5-081] are sufficiently precautionary to avoid potential adverse impacts to dormice during construction based on the assumption of species presence in suitable habitat. The Applicant does not intend to complete nest tube / footprint tunnel surveys for dormice, based on this approach. As set out within ES Volume 1, Chapter 9: Ecology and Biodiversity [REP4-010] , no significant residual adverse impacts on dormice are anticipated as a result of the Scheme, and the Applicant maintains that this assessment is sufficiently robust and based on a proportionate approach to species-specific surveys. The Applicant notes that Natural

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				England are in agreement with this approach as set out under EB2.14 in their Responses to the ExA's Second Written Questions (ExQ2) [REP5-140] .
SLD1-188	Draft DCO	Outline Ecological Protection and Mitigation Strategy	3.1.152. Paragraphs 15.1-15.3: If not carried out at the examination stage, full crayfish trapping/torching should be conducted on relevant water courses on and off-site well prior to works commencing. As with dormice, findings should inform the eventual, finalised EPMS. Measures may include, but are not limited to: securing relevant licences, re-routing access to avoid the relevant stream/wet ditch sections entirely, allowing for broader embankment buffers along stream sections and landscaping considerations (see section below)	The Applicant notes this comment and maintains that the avoidance and mitigation measures for white-clawed crayfish set out within the Outline EPMS [REP5-081] are sufficiently precautionary to avoid potential adverse impacts to the species during construction based on the assumption of species presence in suitable habitat. The Applicant does not intend to complete detailed surveys for white-clawed crayfish, based on this approach. As set out within ES Volume 1, Chapter 9: Ecology and Biodiversity [REP4-010] , no significant residual adverse impacts on white-clawed crayfish are anticipated as a result of the

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Scheme, and the Applicant maintains that this assessment is sufficiently robust and based on a proportionate approach to species-specific surveys.
SLD1-189	Draft DCO	Outline Battery Safety Management Plan	3.1.153. Paragraph4.1.9: SLD remain concerned about the option being open to the Applicant that a BESS enclosure is left to burn out rather than steps taken to try and halt the thermal runaway event. This issue also arises in respect of the proposed firefighting approach in 5.5.2.	NFPA 855 (2026) identifies explosion prevention and protection to be the primary focus for BESS safety. Automatic fire suppression systems can both increase explosion risk and increase pollution risks from a BESS fire, which is also reflected in NFCC guidance. NFCC guidance states: <i>"It is becoming increasingly common for BESS to be designed and manufactured without any suppression system, and to be specifically designed so that a fire can be contained within the BESS cabinet/enclosure. Even in cases where no water-based suppression system is installed,</i>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				<i>local water sources will always be needed for exposure protection to limit cabinet-to-cabinet fire spread.</i> <i>The primary role of a fire suppression system in a BESS is to prevent a fire in the ancillary electrical equipment spreading to the battery modules. It may have a limited effect to protect the BESS from an external fire spreading to it. All claims of performance of suppression systems need to be supported with appropriate evidence for that specific use case.</i> <i>The suppression system, regardless of type, will have little effect on a thermal event within the battery cell. Their primary function is to help prevent cell to cell propagation, rather than fully extinguishing a fire in the cell. The suppression system may, however, offer the advantage of</i>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				<i>dealing with fires occurring elsewhere within the BESS cabinet that are unrelated to the lithium battery.</i> <i>A developer may propose that suppression systems are not required in the design. In such cases, the fire and rescue service should be satisfied that alternative controls are in place to prevent a fire or other thermal event in the BESS cabinet/enclosure of origin, from propagating to adjacent equipment."</i> The Applicant's Outline BSMP [REP3-106] fully aligns NFCC guidance and with NFPA 855 (2026) requirements for suppression systems and explosion prevention system requirements. Section 4.1.33 of the Outline BSMP [REP3-106] stipulates:

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				<i>"NFCC (2026) (Ref 1) guidance acknowledges that it is increasingly common for BESS enclosures to be designed without integrated automatic fire suppression systems because high levels of thermal insulation are integrated which allows enclosures to be closely spaced whilst preventing propagation of fire to adjacent BESS. As mandated in NFPA 855 (2026) LSFT and / or full scale destruction testing to establish minimum equipment spacing distances coupled with rigorous site-specific consequence modelling will be conducted to demonstrate that loss will be safely limited to one BESS enclosure without the intervention of D&WFRS."</i>
SLD1-190	Draft DCO	Outline Battery Safety	3.1.154. Paragraph 5.5.10: it is recognised that the availability of water on site is provided for by reference to the NFCC guidance	The Applicant has addressed this issue in their response to SLD1-116.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		Management Plan	(albeit see the concerns expressed in the ExAQs on this). However, the NFCC guidance recognises that "any incident may last several hours" (part 10). That reflects broader evidence that BESS thermal runaway can last for many hours and even days. As a consequence, after initial stored water provided for by the site is used, there is the potential for further water to be sourced offsite to continue the response by the fire services. For that reason, there is concern that any drainage design should take this into account and not simply be based on the water available for the initial response on site.	
SLD1-191	Draft DCO	Outline Construction Traffic Management Plan	3.1.155. The following changes are proposed: · Table 1: This needs to be updated to reflect the fact that it is now acknowledged that the 400kV	This is updated in the Deadline 6 submission in Table 1 of the Outline CTMP [EN010168/APP/7.22] (Revision 6).

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			substation will take much longer to construct (2 years).	
SLD1-192	Draft DCO	Outline Construction Traffic Management Plan	· Paragraph 2.1.4: The proposed emergency access for a fire appliance to the BESS is along Hill Hayes Lane that has a width of around 3.0m and no passing places in some areas. This may not be safe as emergency vehicles could be blocked or delayed.	Hill Hays lane is wider than 3m and can be approached in two directions.
SLD1-193	Draft DCO	Outline Construction Traffic Management Plan	· Paragraph 2.1.5: [REDACTED] has previously voiced his concern about the over-reliance on banksmen to overcome visibility constraints at access points.	Banksmen are a health and safety requirement for the contractor so must be provided is a recognised transport management measure and is secured through the Outline CTMP [REP5-083] section 2.25 and the DCO requirement 15 in the Draft DCO [REP5-012] .
SLD1-194	Draft DCO	Outline Construction Traffic Management Plan	· Cable route access (general): The CTMP makes no provision for other junctions on the highway network (other than access points) where construction traffic may lead to highway safety problems.	The construction traffic is managed through the measures set out in the Outline CTMP [REP5-083] including construction signage on the network that would include these

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			Examples would be the two junctions south of Grittleton (Neeld Court and road to Leigh Delamere) that are used to access cable route access points but suffer from very poor visibility.	two junctions. The Outline CTMP [REP5-083] at section 4.5 explains that signage will be provided along the construction routes.
SLD1-195	Draft DCO	Outline Construction Traffic Management Plan	· Table 3: Further detail of access 109 (Fowlswick Lane) is required.	Details are provided in column 5 in Table 3 of the Outline CTMP [EN010168/APP/7.22] (Revision 6) and was updated in the Deadline 5 submission.
SLD1-196	Draft DCO	Outline Construction Traffic Management Plan	· Paragraph 2.5.2 and Section 4.7: The HGV booking system has not been shown to be feasible or effective. Given how important this is from a highway safety perspective, the CTMP needs to provide a much more detailed description of a possible arrangement, including monitoring and enforcement. No measures are available to prevent construction HGVs from meeting existing HGVs on narrow lanes.	See response TT2.3 in the Applicant's Response to the Examining Authority's Second Written Questions [REP5-097] .

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
SLD1-197	Draft DCO	Outline Construction Traffic Management Plan	· Paragraph 2.5.5: It is not made clear how 'specific traffic management' differs from the use of banksmen since both appear to be achieving the same result.	Banksmen are proposed at all access junctions as stated at paragraph 2.1.5 in the Outline CTMP [REP5-083] . Temporary signals and stop/go boards are examples of other traffic-management measures
SLD1-198	Draft DCO	Outline Construction Traffic Management Plan	· Paragraph 3.2.1: It is not proposed that each BESS unit will constitute an abnormal load. This was not originally anticipated.	The Applicant refers to Highways Technical Note in response to Appendix A of the SLD Deadline 4 Submission [REP5-107] submitted at Deadline 5 which confirms that individual BESS units would require one delivery. The trip generation calculations have been updated based on discussions with SLD and submitted at deadline 5. This includes 270 HGVs for the BESS units. BESS units (LWH, 6.0582.4382.896)- Standard size is a 20' HC container (5MWh per container) - 1 unit per HGV

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				(Confirmed by Canadian Solar) - 43 tonne weight
SLD1-199	Draft DCO	Outline Construction Traffic Management Plan	· Table 4 and para 6.14.1: Given the high sensitivity of the local network, local communities, vulnerable highway users and the National Landscape to increases in HGV movements, there is a reasonable argument to monitor and enforce HGV numbers with additional mitigation/penalties if the predicted HGV numbers are exceeded. Paragraph 6.14.1 requires monitoring of HGV numbers but reporting and enforcement is not clearly defined. It appears that contractors may be targeted for breaches of the CTMP.	Paragraph 6.14.13 of the Outline CTMP [REP5-083] submitted at Deadline 5 includes reference to a reporting system.
SLD1-200	Draft DCO	Outline Construction Traffic Management Plan	· Paragraph 3.2.5: It appears likely that the peak number of HGV movements will increase trip generation rates.	This has been updated in the Outline CTMP [EN010168/APP/7.22] (Revision 6) submitted at Deadline 6.
SLD1-201	Draft DCO	Outline Construction	· Paragraph 3.2.8 onwards: The Applicant makes assumptions	The Applicant assumes a peak day flow every day of the

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		Traffic Management Plan	about numbers of workers and modes of travel. Again, given the sensitivity of the local highway network, there is a reasonable argument for monitoring numbers and modes (minibus use etc) and introducing penalties if vehicle numbers exceed those currently predicted;	construction period for workers so does not consider it likely that these numbers will be exceeded. The AADT if monitored can only be determined at the end of the construction period given the likely fluctuations in construction phases
SLD1-202	Draft DCO	Outline Construction Traffic Management Plan	· Section 3.3: There have been very broad assumptions made about the numbers of light and heavy vehicles accessing the cable route corridor. There are some places (e.g. Grittleton) that are highly sensitive to any uplift in vehicle numbers. There needs to be a way to monitor and manage movements at different access points along the cable route.	Trips into and out of the site access are monitored through a booking system as set out in the Outline CTMP [REP5-083] . The Applicant's view is that given the limited movements per day generated by the cable route access junctions, i.e. 4 HGVs and 10 construction worker trips per day combined with the short duration each cable access location will be in use, 90 days and adoption of the highway mitigation and management measures set out within the Outline CTMP [REP5-083] , any

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				additional monitoring is not considered applicable.
SLD1-203	Draft DCO	Outline Construction Traffic Management Plan	• Section 4: There is no management of staff vehicle movements. It is possible that sensitive villages such as Norton and Hullavington could experience significant uplifts in vehicle movements. Paragraph 3.4.3 suggests that workers are advised to avoid local schools but there is no stronger obligation to minimise adverse impacts on these sensitive areas. • Additionally, there should be a requirement for HGVs to avoid using reversing alerts that are unnecessarily loud to minimise noise impacts on neighbouring areas. Consideration should be given to removing such audible noises where possible.	There is a construction worker travel plan intended to control this, a final version will be produced and submitted at the detailed design stage once a contractor/s is on board.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
SLD1-204	Draft DCO	Outline Construction Traffic Management Plan	· Section 4.6: There is ongoing discussion regarding the sections of road that would require widening or improvement to avoid unacceptable highway safety impacts. This will need to be accounted for in the outline plan.	The Outline CTMP [REP5-083] will be updated if any additional areas of widening are agreed.
SLD1-205	Draft DCO	Outline Construction Traffic Management Plan	· Section 5: This section needs to include arrangements for the BESS unit abnormal loads.	The AIL's and management of the route are dealt with outside of the DCO and through a special-order licence.
SLD1-206	Draft DCO	Outline Construction Traffic Management Plan	· Table 7: Given the difficulties examining the Highway Improvement Areas, [REDACTED] is not yet able to comment on this but will do so as soon as feasible.	The Applicant notes this comment.
SLD1-207	Draft DCO	Outline Construction Traffic Management Plan	· Section 6.6: The Construction Worker Travel Plan is described briefly as an advisory document. This does not appear to provide a robust means of managing the potential adverse impacts on local	Standard addition to an Outline CTMP [REP5-083] and provides a valid way to manage construction workers. A final version will be produced and submitted at the detailed design

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			communities over an extended period.	stage once a contractor/s is on board.
SLD1-208	Draft DCO	Outline Construction Traffic Management Plan	· Section 6.6 penultimate bullet: In the case of road closures, the requirement for construction traffic to use the formal diversion routes may be entirely inappropriate because of the size of most construction vehicles. In the event of construction routes being temporarily closed, construction vehicle movements should be stopped.	It is factual to state that if there are no suitable routes to site, then deliveries would need to be stopped. Construction activities on site will most likely be able to continue unless LV's are unable to access the site,
SLD1-209	Draft DCO	Outline Construction Traffic Management Plan	· Section 6.14: Monitoring will be complicated by the multiplicity of compounds and accesses. The CTMP does not provide a robust system for managing this complexity.	The booking system described in the Outline CTMP [REP5-083] will be in action for every access
SLD1-210	Draft DCO	Outline Construction Traffic Management Plan	· Section 6.15: Briefing drivers on the Highway Code does not compensate for the use of unsuitable highway links and	The applicant does not consider the highway links on the proposed construction routes to be unsuitable. The proposed widening and existing passing places provide adequate passing

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			unacceptable impacts on vulnerable highway users.	opportunities for NMU's and other road users
SLD1-211	Draft DCO	Outline Archaeological Mitigation Strategy	3.1.156. Stop Lime Down note that within the Outline Archaeological Mitigation Strategy [APP-230], the proposed mitigation of Field F120 of the Cable Route, remains undetermined. Stop Lime Down wish to reiterate that it considers that strip map and record excavation of the scheduled monument is not an appropriate mitigation and clarity should be sought regarding the viability of horizontal directional drilling in this location. See Marrons' comments at [REP1-171] para 3.22 onwards.	No SMS is proposed at this location – please see ES Volume 3, Appendix 12.6 Archaeological Mitigation Strategy [APP-230]. HDD is proposed within the cable corridor route to the west of 'Pillow mound 280m southwest of Surrendell Farm' (NHLE: 1018610). As such there are no direct impacts as a result of the Scheme to the Scheduled Monument. Geophysical survey within the cable corridor has not identified any buried archaeological features. HDD is being undertaken in Field 120 as a precautionary mitigation measure.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Historic England and Wiltshire Council are both in agreement with the approach.
SLD1-212	Draft DCO	Outline Archaeological Mitigation Strategy	3.1.157. As explained at [REP1-171] para 3.15, SLD have concerns about ecology and landscape mitigation leading to long term intrusive planting that impacts unidentified archaeological remains. This should be provided for an avoided in the outline AMS.	ES Volume 3, Appendix 12.6 Archaeological Mitigation Strategy [APP-230] considers impacts as a result of ecological and landscape mitigation.
SLD1-213	Draft DCO	Outline Archaeological Mitigation Strategy	3.1.158. As explained at [REP1-171] para 3.17, SLD has concerns about and considers more detail should be given about the briefing of non-archaeological professionals in advance of works around valuable assets. This alternatively could be managed	The Community Liaison Group would provide an appropriate mechanism for communicating and reinforcing understanding among non-archaeological professionals regarding the location and sensitivity of buried archaeological assets, together with the relevant proposed mitigation measures.
SLD1-214	Draft DCO	Outline Archaeological	3.1.159. SLD have also highlighted concerns about HDD nearby to Scheduled Monuments and	It should be noted that HDD is proposed within the cable corridor route to the west of 'Pillow mound 280m southwest of

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		Mitigation Strategy	consider that this should be addressed and avoided.	Surrendell Farm' (NHLE: 1018610). As such there are no direct impacts as a result of the Scheme to the Scheduled Monument. Geophysical survey within the cable corridor has not identified any buried archaeological features. HDD is being undertaken in this location as a precautionary mitigation measure.
SLD1-215	Draft DCO	Design Principles and Parameters	3.1.160. While not a control document per se, SLD's expert Ms. Tinkler notes the various references to colours which blend into the setting of the Scheme (e.g. the Conversion units on PDF p.11, acoustic barriers on PDF p.24 etc.). Ms. Tinkler considers that some form of informal colour assessment would be appropriate. This was a point made at para 2.2.42 of [REP4-132].	The Applicant notes this comment and directs to the Applicant's Response to Action Point 22 on Pages 63 – 65 of Written Summary of the Applicant's Oral Submissions and Responses at Issue Specific Hearing 2 and Responses to Action Points [REP4-085] .

Table 3-13 Stop Lime Down: Conclusion

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
SLD2-001	Description and DCO Process	Conclusion	4. Conclusion 4.1.1. This submission has responded to ExQ2 and commented upon the documents submitted by the Applicant and other parties at Deadline 4. 4.1.2. SLD's review of that material confirms that the additional information has not resolved the concerns raised by SLD at preceding deadlines. For all the reasons set out in this submission, and the documents prepared by SLD so far, SLD maintains that development consent should not be granted for the Scheme.	The Applicant notes this comment and has responded to SLD in full above.

4 The Applicant's Response to Host and Neighbouring Parish Councils

4.1 Chippenham Without Parish Council

Table 4-1 Chippenham Without Parish Council: Responses to Examining Authority's Second Written Questions

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
CWPC-001	Description and DCO Process	Introduction	Thank you for your Email of the 27 July 2026 regarding the above mentioned proposals and the invitation to respond to the Examination Authority's Second Written Questions (ExQ2), which in this case relates to the Council's representations on the impact of cable laying construction sites and is partially covered in Question TT2.10. I say, partially covered and I will explain the reasoning later in this response. <i>TT2.10 Can the applicant explain why, if the AIL construction access route to the Fowlswick Lane compound is intended to come off the B4039, it intends to take access into the site from the north-eastern end of that field and not the south-western end, closer to the junction with the B4039? The ExA appreciates that the intent may be to use an existing field</i>	See Applicant's response to CWPC below.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<i>access (in the location of proposed access 109), however, as highlighted by Chippenham Without Parish Council [REP4-094], the proposed opening in this location would require considerable enlargement and metaling, as would the Fowlswick Lane itself, which would need to be widened down to the crossroads, and would require the removal of the mature hedgerow along the 200 metre length with verge, which could also have highway drainage implications.</i> <i>In addition to the above question, and in light of the applicant's response to ISH3 Action Point 4 [REP4-086], which says that a turning area for the whole AIL vehicle and trailer is not required as the AIL trailers are modular and on exit, the cab is unhitched from the front of the trailer and driven to the back of the trailer and hitched up, then drives off in forward gear, the ExA seeks to understand</i>	

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			a) why the HIA area wraps the north-eastern side of the compound and extends along Fowlswick Lane to Fowlswick Cottages (as shown on Figure 13-12-2 [APP-157]), and b) the full nature of the highway improvement works proposed in this location. The ExA expects substantially greater detail and explanation than that provided in Table 3 of the oCTMP and Table 13-11 of the Transport Assessment for access 109/ North of Fowlswick Lane.	
CWPC-002	Transport and Access	Fowlswick Lane	Firstly, I respond in connection with Fowlswick Lane and the associated B4039 road junction. The Council's original representations covered the arguments/concerns that lead to the Question now being raised. The applicant, as the Examination Authority (EA) observes, is proposing access to the construction site via the	Access to the Fowlswick Lane compound is intended to be taken from Fowlswick Lane at the north-eastern end of the field as shown in ES Volume 2, Figure 13-12 Construction Access Locations: Cable Route Corridor [APP-157] and Drawing PL109 in Annex D of ES Volume 3, Appendix 13-1: Transport Assessment [REP5-061].

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			track alongside the field to the field's northeast corner. This entrance is near Fowlswick Cottages (highway improvement ref. 109 on mapping). In the applicant's proposal, this will require "widening" of Fowlswick Lane as far as Fowlswick Farm in one direction and part way along Fowlswick Lane in the direction of the B4039, but not all the way up to the junction with the B4039. However, this length will also require improvement in road quality on the Lane and, also, the track leading to access into the site. It will also require removal of hedges.	To avoid the removal of hedgerows, access can be managed by banksmen or traffic management measures to manage vehicles entering and exiting the site. a. The HIA area wraps the north-eastern side of the compound and extends along Fowlswick Lane to Fowlswick Cottages to include for potential traffic management measures at the access The full nature of highway improvement work in this location will relate to access works only, as shown in Drawing PL109 in Annex D of ES Volume 3, Appendix 13-1: Transport Assessment [REP5-061]. This includes for a: 2.4m x 112.74m visibility splay to the south, based on a measured 85th percentile vehicle speed of 42.2mph. Existing vegetation to be trimmed/cut back so that the retained height is not greater than 600mm, plus a 6m wide access with bellmouth. Access is also proposed to be managed either though bankmen or other traffic management measures.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
CWPC-003	Transport and Access	Fowlswick Lane	The Council asks that it be noted that before reaching Fowlswick Lane, access to the site will be from the A420 onto the B4039 with a right hand turn at Fowlswick Lane crossroads, an accident blackspot.	The access route is already included in the Outline CTMP [REP5-083] at paragraph 4.4.2. Three accidents were recorded on the B4039 close to Fowlswick Lane as shown in table 13-8 of the ES Volume 3 Appendix 13-1 Transport Assessment [REP5-061] so it is not regarded as an accident blackspot by the applicant. The applicant has added a bullet point into the Outline CTMP [EN010168/APP/7.22] (Revision 6) at para 6.5 in Deadline 6, stating: <i>"provide additional construction traffic warning signs prior to and at the junction with Fowlswick lane and the B4039"</i>
CWPC-004	Transport and Access	Fowlswick Lane	The Council believe that the (EA) should be asking the applicant the following additional questions: a. The remainder of Fowlswick Lane to the junction with the B4039 will also require improvement (upgrading) similar to that stated. Why is this section of Fowlswick Lane not included and therefore not part of the (EA) questioning of the applicant?	Please see Applicant's Response to Submissions Received at Deadline 4 [REP5-098] and CWPC-003. Also, see The Applicant's Response to the Examining Authority's Second Written Questions [REP5-097] , TT2.10.
CWPC-005	Transport and Access	Highway Safety and	b. The applicant's exit proposal from Fowlswick Lane onto the B4039 is	AIL movements are managed and/or escorted, are relatively few in number,

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
		Hedgerow Removal	subject to very limited visibility, with the speed on the B4039 at this point unrestricted. Therefore, there is a significant visibility hazard for Abnormal Indivisible Load (AIL) vehicles exiting the Lane at this point, and a hazard for vehicles approaching this junction from Yatton Keynell direction. To improve visibility, hedges will have to be removed on the B4039, and vehicles speeds on this section of the B4039 will have to be restricted. Therefore, why are these matters not included and part of the (EA) questioning of the applicant?	and are dealt with outside of the DCO process and through a special order licence. The junction already has a number of existing HGVs using it without any serious accident record.
CWPC-006	Transport and Access	Fowlswick Lane	c. If the applicant advises the (EA) that it will change the construction site's access to a new entrance on the southwest corner of the field, i.e. essentially at the junction of Fowlswick Lane at the B4039, then questions a. and b. still apply.	The access is not proposed to be moved.
CWPC-007	Noise and Vibration	Noise Impact	d. The construction site is adjacent to the Golf Driving Range and Fowlswick Cottages and those living at Tiddleywink. The (EA) has asked no questions about noise levels on the site, and the expected impact on	The noise levels from construction activity in the area, including R51 on Fowlswick Lane, have been assessed in ES Volume 1 Chapter 14: Noise and Vibration [REP5-024] under reasonable worst-case assumptions and, as shown

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			these residents. Why not? The noise levels need to be clearly stated and included as part of a development consent.	in Table 14-19, significant effects are not expected due to the distance between the Cable Route Corridor and sensitive receptor locations.
CWPC-008	Site Selection and Alternatives	Location of Cable Laying Construction Sites	I mentioned above Question TT2.10 "partially covering" the Council's representations on the impact of cable laying construction sites. This is because those representations also covered another site and at the time believed to be in an adjoining Parish. This related to and was quoted as a "field opposite Stowell Farm, in the Parish of Corsham". This was identified at the time on a Map referenced DWG A with the submission. Further investigation has revealed that the proposed site is not situated where my Council originally thought but is actually within Chippenham Without Parish. This is shown on Map referenced DWG C now attached. Despite this error all of the comments made previously still apply and the	The accident records don't indicate an accident blackspot at this location. See Applicant's Response to Submissions Received at Deadline 4 [REP5-098] and CWPC-003. However, signage will be provided warning of construction traffic and routing in line with the contents of the Outline CTMP [REP5-083].

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			applicant's proposals clearly show the intended access route using the local Lanes within the Parish culminating at the A420 Allington crossroads, an accident blackspot.	
CWPC-009	Transport and Access	Access Route	I now respond in connection with this location (highway improvement ref.114 on mapping) and, again, the Council's original representation covered the arguments/concerns that lead to the Questions that should now be raised. The applicant has a cable laying construction site in a field to the northwest of Stowell Farm and the crossroads junction (C180/Corsham Lane/Biddestone Lane/Jubilee Wood Road) that marks the boundary of Chippenham Without Parish and Corsham Parish. The access route to this site, as proposed by the applicant, will be from the A420 crossroads further to the north at the junction with the C180 (Allington Bar Farm), along the C180 to Sheldon Corner and then along the C180 in the direction of Corsham. The C180	See Applicant's response to CWPC-010.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			is, therefore, the main access route from the Class A highway network.	
CWPC-010	Transport and Access	Access Route	Access to this construction site will be from the C180 via an entrance located on the frontage of a field (highway improvement ref.114 on mapping). The speed limit on this road is unrestricted albeit that some road users acknowledge the narrow road conditions.	The cable route will be constructed in four separate 5.5km sections. One access in operation in each section at any one time as rolling construction. Each access will be operation for approximately 90 days. The number of vehicle trips associated with each cable route corridor access are relatively low (see para 13.10.69 of ES Volume 1, Chapter 13: Transport and Access [REP4-014] and there are no current HGV restrictions or accident clusters along this road. The deliveries can be managed at the site access.
CWPC-011	Transport and Access	Access Route	Accordingly, construction vehicles, including large (AIL) vehicles, exiting from the site will be doing so with little visibility.	Construction movements are managed. Banksmen are a health and safety requirement for the contractor and will be present at any access which will help with access and egress. The Outline CTMP [REP5-083] includes measures such as construction routing signage which will warn road users of turning vehicles.
CWPC-012	Transport and Access	Highway Safety	In addition Sheldon Corner en-route from the A420 is a further "at risk" stop junction with Frogwell Lane and is a major concern.	See Applicant's Response to Submissions Received at Deadline 4 [REP5-098] and CWPC-003. However, signage will be provided warning of

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				construction traffic and routing in line with the contents of the Outline CTMP [REP5-083] .
CWPC-013	Transport and Access	Access Routes	Despite the concern expressed by Chippenham Without Parish Council the (EA) under Question ref. TT2.10 has raised no matters of concern or query with the applicant. Given the Parish's concerns, the (EA) is asked by the Council as to why they are not questioning the basis on which development consent may be granted? In particular, the Council asks that the (EA) should question the applicant on the following: a. The suitability of the C180/A420 crossroads junction as the major access point for construction vehicles, in particular vehicles with an abnormal indivisible load (AIL). This crossroads on the Allington Farm Shop side generally has stationary traffic on the C180 at the A420 junction arising from entry /exit into the Farm Shop and A420 traffic flow. Therefore, is the C180/A420 a safe entry and exit point for	See Applicant's Response to Submissions Received at Deadline 4 [REP5-098] and CWPC-003.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			construction traffic in the light of current traffic volumes, speed of traffic on the A420 approaching this junction, and the width of the C180 of the Farm Shop side of the junction?	
CWPC-014	Transport and Access	Adequacy of Routes	b. Use of the C180 by large vehicles is currently very limited, and largely confined to vehicles visiting Sheldon Corner Trading Estate. Therefore, the (EA) should ask the applicant to demonstrate that the C180 from the A420 to Stowell Farm is of adequate width for its traffic, and whether there are any potential hazards for general traffic encountering construction traffic, particularly AIL vehicles, along this route?	See Applicant's Response to Submissions Received at Deadline 4 [REP5-098] and CWPC-003.
CWPC-015	Transport and Access	Adequacy of Routes	c. As described above, the entry/exit onto the C180 of the construction site is blind when approached from directions, and already requires to be approached with caution regarding speed and visibility. Therefore, the Council asks the (EA) why the applicant is not being questioned as to the suitability of this entry/exit position for the construction site?	See Applicant's Response to Submissions Received at Deadline 4 [REP5-098] and CWPC-003.
CWPC-016	Transport and Access	Adequacy of Routes	d. The (EA) should ask the applicant whether AIL vehicles can	AIL movements are managed and/or escorted, are relatively few in number

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			travel/enter/exit the construction site without having to occupy the whole of the C180 in order to gain a sufficient width and angle of travel/entry/exit i.e. will vehicles approaching find their side to the C180 occupied by a large (AIL vehicle)?	and are dealt with outside of the DCO process and through a special order licence. No AILs are proposed on this route. Also, see Applicant's Response to Submissions Received at Deadline 4 [REP5-098] and CWPC-003.
CWPC-017	Transport and Access	Hedgerow Removal and Surfacing	e. The (EA) should ask the applicant whether any hedges or trees need to be removed at the site entry/exit point to ensure safe passage in and out for site traffic, and to safeguard other road users? Also, whether the entrance needs to have a hard surface (metalled)?	The works at the access junctions are set out in PL114 of the Outline CTMP [REP5-083] .
CWPC-018	Description and DCO Process	Requests to the ExA	Additionally, in making this submission to the (EA), the Council would request that the (EA): a. Acknowledge receipt of the additional submission and its reference number and location in the Development Consent Inquiry documents. b. Inform the Parish Council whether the (EA) accepts the validity of the questions?	The Applicant notes these requests of the Examining Authority from Chippenham Without Parish Council.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			c. If so, whether the (EA) will ask of the applicant to respond and provide the Council with a copy of the questions the (EA) has asked. d. To provide the Council with a copy of the replies the (EA) has received from the applicant regard both the Fowlswick Lane and Stowell Farm area construction sites.	

4.2 Grittleton Parish Council

Table 4-2 Grittleton Parish Council: Responses to Examining Authority's Second Written Questions

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
GPC-001	Socio-Economics, Tourism and Recreation	ExQ2 S.E 2.3	<i>SE2.3 Compensation for Community Facilities</i> <i>All Parties: The SoCG with Wiltshire Council, section 3.12.11, suggests a business compensation scheme [REP4-061]. Aside from the compensation to businesses there have been concerns raised by operators of community facilities that the proposal will result in their closure resulting from a lack of bookings during the construction, maintenance and decommissioning phases. Examples include [RR-2749], [RR-4315], [RR-4617]. All parties are asked to consider if they would be agreeable to a community facility compensation fund that would ensure they remain open and functional during the aforementioned phases and available for community use despite any negative effects of the proposed development. The applicant should note that simple reference to</i>	The Applicant has provided their reasoning for their objection to the implementation of a business compensation scheme within its response to question SE2.1 in The Applicant's Response to the Examining Authority's Second Written Questions [REP5-097]. The Applicant does not agree that such a compensation scheme is proportionate to the likely effects the Scheme will have on local business, given the level of mitigation measures secured through the DCO. The Applicant is continuing to engage with Wiltshire Council through the Statement of Common Ground [REP5-087] to understand the extent to which there is not yet agreement on the economic mitigation measures proposed by the Applicant.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<i>the Community Benefit Fund is not considered an appropriate response.</i> Grittleton Parish Council (GPC) would like to fully support the idea of a "community facility compensation fund" for the operators of community facilities affected in the construction, maintenance and decommissioning phases. We would also like a wide interpretation of which bodies will be eligible and that the bodies themselves are consulted as to the likely financial losses that have to be compensated for.	
GPC-002	Socio-Economics, Tourism and Recreation	ExQ2 S.E 2.3	Additionally, we would like the idea of compensation for those householders along the construction and cable routes who will suffer additional cleaning expenses for their premises and vehicles which should be based on a proportion of the average household spend on cleaning and washing up materials derived from the ONS Family Spending survey and a multiple of the average cost of time spent cleaning spent on house cleaning, washing as well as a	The Applicant maintains that a compensation scheme for cleaning expenses is disproportionate, unnecessary, and would be difficult to verify, as it would fail to account for a wide variety of uncontrollable factors outside of the Scheme. The potential impacts from construction dust associated with the Scheme have been fully assessed and found to be non-significant once mitigation is applied, and robust dust suppression and site management controls are legally

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			multiple of the average cost of a complete carwash.	secured through the Outline CEMP [REP5-071] . The Community Liaison Group (CLG) would provide the appropriate mechanism for monitoring and recording in the unlikely event of air quality or dust related complaints.
GPC-003	Socio-Economics, Tourism and Recreation	ExQ2 S.E 2.3	Compensation schemes should have a local representative involved in the administration.	See response to GPC-001
GPC-004	Transport and Access	ExQ2 T.T 2.5	<i>TT2.5 Alderton Road</i> <i>Highway Improvement Works Q1 Page 54 of 59 ExQ2 Question to: Question: The ExA notes the inclusion of improved drawings within Appendix E of the oCTMP [REP4-057] and Annex I of the Transport Assessment [REP4-037] for highway improvement areas along Alderton Road and Fosse Way with annotations for the carriageway widths and areas of widening. However, details of the surface treatment for the widening areas is absent from the legend on the drawings and description of works in</i>	The Applicant makes note of this comment. Further to submission at Deadline 5, details of the surface treatment for the widening areas is now included in the legend on the drawings and the description of works in Table 7 of the Outline CTMP [REP5-083] and Table 13-20 of the ES Volume 3, Appendix 13-1: Transport Assessment [REP5-061] has been updated The widened areas will be laid and finished with asphalt to base course, binder course and surface course to match the adjoining highway.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<i>Table 7 of the oCTMP/ Table 13-20 of the Transport Assessment. Presumably if low lying grasses and edge of carriageway gravel are being removed to create passing bays, the widened area will need to be laid and finished with asphalt (or similar) to base course, binder course and surface course to match the adjoining highway. The applicant is asked to confirm and include the detail in Table 7 of the oCTMP/ Table 13-20 of the Transport Assessment and on the relevant drawings.</i> GPC are concerned that the nature and characteristics of the road would be changed by any improvement works. Both the improvement works and the exponential increase in heavy vehicle traffic will have a serious adverse effect to the quality of life for not only for residents living on the Alderton Road but also the many users going about everyday life.	As set out in Table 7 of the Outline CTMP [REP5-083] and Table 13-20 of the ES Volume 3, Appendix 13-1: Transport Assessment [REP5-061] submitted at Deadline 5, the works are proposed to be temporary and as such, and changes to the character of the roadway would also be temporary in nature.
GPC-005	Transport and Access	ExQ2 T.T 2.5	GPC remind the Examiners that this road is part of the extremely well used Wiltshire Cycle network a significant sport/leisure facility.	The Applicant confirms that specific assessment of the Wiltshire Way (including at the Fosse Way and Alderton Road) was undertaken in ES

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
	Socio-Economics, Tourism and Recreation			Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241] which found a medium-term temporary moderate adverse effect during construction and decommissioning. These are significant effects and therefore will have to be considered in the planning balance when a decision on the DCO being consented is made. Further analysis on Non-Motorised Users (NMU) along this section of road is being submitted at Deadline 6.
GPC-006	Transport and Access	ExQ2 T.T 2.5	This road once it leaves the settlement is subject to national seed limit and is narrow and winding – a feature of many roads within the Cotswold National Landscape.	The Applicant makes note of this comment. The Applicant has therefore proposed road widening set out in in Table 7 of the Outline CTMP [REP5-083] and Table 13-20 of the ES Volume 3, Appendix 13-1: Transport Assessment [REP5-061] submitted at Deadline 5.
GPC-007	Transport and Access	ExQ2 T.T 2.6	<i>TT2.6 Highways Improvement Works Q2.</i> <i>Following ExA questions at ISH3, the ExA appreciates the applicant updating the oCTMP [REP4-057] to confirm the extent of works required</i>	The Applicant has confirmed that the identified area is public highway. Due to the absence of land within the order limits, the interest has not received specific engagement from the Scheme. The Applicant has previously

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<i>at the B4039 at The Gibb on Drawing No. PL404 in Appendix E, which is also noted in Table 7 of the oCTMP as location B4039 at the Salutation Inn, Castle Coombe. The updates state that the works include removal of existing vegetation on the inside corner (in front of the property known as Firs Farm). While the applicant confirmed at ISH3 that the vegetation is within the public highway and not part of the Firs Farm property, it is nonetheless seemingly maintained by that property. The ExA has read the applicant's response to ISH3 Action Point 2 relating to dialogue with Firs Farm [REP4-086] but this response suggests that the correspondence issued to Firs Farm to date is generic consultation/ project update material, and not specifically about the impacts on this particular property and its curtilage. The ExA therefore seeks assurances that dialogue with the owners of that property has taken place on the matter of this vegetation removal to facilitate the highway improvement area (provide evidence of specific correspondence on this</i>	distributed section 48 notification and section 42 targeted consultation notification to the interest at Firs Farm, inviting the interest to consult on the specific AIL routes. Any actual losses experienced by the undertaking of works associated with the delivery of the Scheme will be appropriately assessed under the compensation code.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<i>matter) and that the vegetation will either be reinstated, subject to the satisfaction of the owners of Firs Farm and highway authority approval, or the owner will be compensated.</i> GPC has in the past established that the property owner of Firs Farm not only maintains the vegetation on the inside corner but also owns the land and not Highways as stated.	
GPC-008	Transport and Access	ExQ2 T.T 2.6	GPC note that Abnormal Loads (AIL) will be subject to separate movement controls, but seek clarification of the access and parking arrangements that would be in place at The Salutation Inn during such movements. The Salutation Inn is reliant upon the on street parking in front of the property to maintain a viable business and any restriction, even temporary would have a significant impact.	AIL movements would be communicated with the owners and operators of The Salutation Inn in advance through the Stakeholder Communication Plan to ensure awareness of upcoming impacts to parking or access. This will largely mitigate business impacts.
GPC-009	Transport and Access	ExQ2 T.T 2.8	<i>TT2.8 Grittleton Crossroads AIL Swept Path</i> <i>At ISH3 the ExA identified that there seemed to be no swept path drawing for AIL vehicles turning left at</i>	The Applicant can confirm that the proposed "temporary" removal of the STOP sign at the crossroads would only be for the duration of time that an AIL is in the vicinity of the crossroads, by installation temporary sign, for the

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<i>Grittleton Crossroads into Alderton Road, rather that the only drawing provided for this location showed a right hand turn at the crossroads towards Yatton Keynell or a left hand turn from Yatton Keynell onto the unnamed road back towards The Gibb. The applicant has subsequently stated in its post hearing note [REP4-086] that the AIL swept path for Grittleton Crossroads is set out in Annex H of ES Volume 3, Appendix 13-1 Transport Assessment [REP3-065] (page 956). The plan referred to by the applicant is the same plan that the ExA was referring to at ISH3. It shows a 16 Axle Girder Frame Abnormal Load Carrier at Grittleton Crossroads but no swept path turning left into Alderton Road.</i> <i>The ExA can only assume that this AIL cannot take a left turn, so instead would have to turn right at the crossroads towards Yatton Keynell and unhitch the cab from the front-end and re-hitch at the back to enable the AIL vehicle to be able to proceed</i>	duration of the time that AIL deliveries will take place.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<i>north along Alderton Road. If this is the case, the ExA would like this confirmed. Also, if this is the case, the ExA would like to understand where the cab would turn around to facilitate this procedure and whether there is sufficient width alongside the waiting carrier for the cab to pass alongside to enable re-hitching without any need for road widening in this location.</i> <i>Of course, if un-hitching and re-hitching is not intended, it remains that there is no swept path drawing for an AIL left turn at the Grittleton crossroads into Alderton Road, and one should be provided.</i> GPC seek assurance that the proposed "temporary" removal of the STOP sign at the crossroads would only be for the duration of time that an AIL is in the vicinity of the crossroads, by installation of a post & socket system of mounting the sign, for the duration of the time that AIL deliveries will take place.	

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
GPC-010	Transport and Access	ExQ2 T.T 2.1	Grittleton crossroads lies with the Grittleton Conservation Area, GPC request that a condition survey (trees & structures) is undertaken prior to construction and on completion of construction to ensure no lasting harm has been caused to the area.	No significant effect (including direct impacts) has been identified to Grittleton Conservation Area as a result of the Scheme. As such the Applicant does not consider a heritage-based, nor arboricultural condition survey to be required and that the measures specified in the CEMP provide sufficient controls.

4.3 Hullavington Parish Council

Table 4-3 Hullavington Parish Council: Comments on any submissions received at Deadline 4

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
HPC-001		1. Introduction	Hullavington Parish Council has reviewed the Applicant's responses contained within Document 9.52 following Open Floor Hearing 2. The Parish Council considers that the Applicant's response does not fully address the substance of the parish-specific evidence presented during the Examination. Whilst the response frequently refers the Examining Authority back to previously submitted application documents and Environmental Statement chapters, it does not explain why the detailed local evidence submitted by Hullavington Parish Council does not alter the Applicant's conclusions. The following observations are therefore respectfully submitted for the Examining Authority's consideration.	The Applicant notes Hullavington Parish Council's concerns has responded to the specific points raised in HPC-002 to 019 below.
HPC-002	Transport and Access	2. Completeness of the Evidence Base	A significant procedural issue arising from Document 9.52 concerns the completeness of the transport evidence.	Further information on trip generation calculations has now been submitted to the Examination in Highways Technical Note in response to

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			In response to DL-003 (Document 9.52, page 29), the Applicant states: "The Applicant is in dialogue with Wiltshire Council and SLD consultants to try to agree a position and way forward in relation to construction trip numbers." The Applicant further states: "Further information on trip generation will be submitted to the Examination at Deadline 5." The Parish Council notes that these statements indicate that the construction traffic evidence underpinning the Applicant's assessment remains under review.	Appendix A of the SLD Deadline 4 Submission [REP5-107] at Deadline 5.
HPC-003	Transport and Access	Transport Impacts	While it is recognised that additional information may appropriately be submitted during the Examination, the Parish Council considers that conclusions regarding transport impacts should be treated with appropriate caution until the revised evidence has been submitted, consulted upon and tested through the Examination process.	Further information on trip generation calculations has now been submitted to the Examination in Highways Technical Note in response to Appendix A of the SLD Deadline 4 Submission [REP5-107] at Deadline 5.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			The Parish Council respectfully submits that it is difficult to reconcile definitive conclusions regarding transport impacts with an acknowledgement that the underlying construction traffic evidence is still being revised.	
HPC-004	Transport and Access Landscape and Visual	3. Failure to Address Parish-Specific Evidence	Throughout Document 9.52, the Applicant frequently refers the Examining Authority to previous application documents and responses to Relevant Representations. The Parish Council does not dispute that these documents contain assessments of the Proposed Development. However, the issue raised during the Examination was not whether these documents exist, but whether the Applicant has adequately considered the detailed evidence submitted specifically in relation to Hullavington. This includes evidence concerning: • the settlement pattern of Hullavington;	The Applicant makes note of this comment. The Applicant maintains that the submitted documents provide a detailed assessment of the Scheme and has produced Technical Notes setting out additional information where requested such as the Tranquillity Assessment - Effects of Construction Traffic on the Cotswolds National Landscape [REP5-099], the Limestone Lowlands Character Assessment [REP5-103] and the Technical Note on Cumulative Sequential Visual Effects [REP1-123] and the Sequential Visual Effect on Wiltshire Cycleway [REP4-078].

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			• the character of the local rural highway network; • pedestrian safety; • construction impacts; • cumulative effects on the village; and • community wellbeing. Simply directing the Examining Authority back to previously submitted documents does not explain why the parish-specific evidence presented during the Examination does not alter the Applicant's conclusions. The Parish Council therefore considers that the Applicant's response does not directly engage with the substance of the evidence submitted.	
HPC-005	Transport and Access	4. Walk 8 and Pedestrian Safety	The Applicant's response to DL-003 (Document 9.52, page 28) acknowledges a number of the physical characteristics identified by the Parish Council. The Applicant states that:	This stretch of road has adequate forward visibility for pedestrians and HGVs and other slow moving vehicles as shown in drawing SP51A in Annex K of the ES Volume 3 Appendix 13-1 Transport Assessment [REP5-061]. This combined with construction signage along the route warning drivers

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			"This stretch of road has no footway and, under the railway bridge, limited verge width." The Applicant also acknowledges: "Pedestrian users already walk on the road and use the verge to step off the road for large vehicles passing." These statements reflect the evidence presented by Hullavington Parish Council during the Examination.	and pedestrians of construction traffic is unlikely to result in any safety issues. A Highways Technical Note – Non-Motorised User Surveys [EN010168/EXAM/9.70] will be submitted at Deadline 6 and it shows a low level of pedestrian use along this route.
HPC-006	Transport and Access Socio-Economics, Tourism and Recreation	PRoWs	However, the Applicant also states: "This route has not been specifically assessed." Instead, the Applicant concludes that another Public Right of Way provides: "a more accurate proxy." The Parish Council respectfully submits that this does not constitute a location-specific assessment of Walk 8.	The Applicant confirms it did not undertake a specific assessment of Hullavington Walk 8 ahead of submission. The Applicant has, however, undertaken individual assessments of footpaths HULL4, HULL5, and HULL29 in ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241], all of which form part of Walk 8 and are the footpaths that connect directly to the road from Hullavington to Bradfield Cottages that

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				is referred to in the parish council's comments. The assessment of these footpaths draws on the assessment of ES Volume 1, Chapter 13: Transport and Access [REP4-014] to determine the extent of effects to users. Given the specific concerns at this location, the existing assessment of HULL4, HULL5, and HULL29 was considered a "more accurate proxy" for pedestrian impacts than the assessment of recreational impacts to the highway network overall, as provided in ES Volume 1 Chapter 16: Socio-Economics, Tourism and Recreation [APP-068].
HPC-007	Transport and Access	Footways	The acknowledged physical constraints, including the absence of a footway, restricted visibility beneath the railway bridge, limited opportunities for pedestrians to obtain refuge and the interaction between pedestrians, cyclists and construction traffic, are unique to this location.	The Applicant refers to its response to HPC-005.
HPC-008	Transport and Access	Routes	The Parish Council therefore considers that reliance upon a proxy assessment of another route, together with assumptions regarding	The Applicant considers that whilst there is no specific assessment of Walk 8, the assessments of affects to recreation in respect of footpaths HULL4, HULL5,

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			compliance with construction traffic routing arrangements, does not demonstrate that the specific characteristics of Walk 8 have been adequately assessed.	and HULL29 in ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241] provide a sufficient assessment of the likely significance of effects to pedestrian access in this location.
HPC-009	Transport and Access	Physical Constraints	Accordingly, the Applicant has not demonstrated why the acknowledged physical constraints would not give rise to a significant adverse effect on pedestrian safety.	The Applicant refers to its response to HPC-008
HPC-010	Transport and Access	5. Construction Traffic	The Applicant concludes that construction traffic impacts would not be significant. However, as noted above, the Applicant also confirms that construction traffic generation remains under discussion and that revised information will be submitted during the Examination (Document 9.52, page 29).	The Applicant has submitted updated trip generation calculations in Highways Technical Note in response to Appendix A of the SLD Deadline 4 Submission [REP5-107] at Deadline 5.
HPC-011	Transport and Access	5. Construction Traffic	The Parish Council respectfully submits that the significance of transport impacts cannot be fully evaluated until the revised construction traffic forecasts have been submitted and independently examined.	The Applicant has submitted updated trip generation calculations in Highways Technical Note in response to Appendix A of the SLD Deadline 4 Submission [REP5-107] at Deadline 5.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
HPC-012	Transport and Access	5. Construction Traffic	The Parish Council therefore requests that appropriate weight be attached to the evolving nature of the transport evidence when considering the Applicant's conclusions.	The Applicant has submitted updated trip generation calculations in Highways Technical Note in response to Appendix A of the SLD Deadline 4 Submission [REP5-107] at Deadline 5. This concludes that the assessment within ES Volume 1, Chapter 13 Transport and Access [REP4-014] adequately assessed the impacts of the development.
HPC-013	Human Health	6. Community Wellbeing	During Open Floor Hearing 2, [REDACTED] referred to the Applicant's own assessment acknowledging that Hullavington is among the communities most affected by the Proposed Development. In response (DL-004, Document 9.52, pages 29–30), the Applicant states that amendments to the Environmental Statement: "do not give rise to any change in the likely significant effects." However, the response does not explain why the acknowledged long-term changes to the character of Hullavington and residents' quality of	The Applicant confirms that the assessment of human health and community wellbeing in ES Volume 1, Chapter 18: Human Health [APP-070] recognises Hullavington as a community of greater sensitivity to changes in its visual surroundings due to its current rural setting, and the anticipated extent to which the Scheme will change that character and potentially the quality of life for residents and visitors. The assessment considers that whilst this effect would be long-term throughout the Scheme's construction, operational and decommissioning phases, it is not anticipated to be a significant adverse effect to mental health and wellbeing. This is because of:

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			life do not amount to significant adverse effects. Rather, the response reiterates the Applicant's conclusion without addressing the Parish Council's concern regarding the reasoning underpinning that conclusion. The Parish Council therefore considers that this matter remains insufficiently explained.	• The physical separation of the Scheme from the village of Hullavington, with visual impacts most likely on the approach routes rather than within the village itself; • Landscape and visual mitigation to be implemented to reduce its visual impact on the surroundings; • Mitigation measures to control physical impacts from the Scheme, such as noise and dust during construction, and fare safety measures during the BESS operational phase; and • The securing of HGV construction routes to avoid the village centre. The Applicant set out this approach, and the mitigation measures relevant to Hullavington village in its response to the parish council's Relevant Representations, at Table 5.13 in the Applicant's Response to Relevant Representations (Part 1) [PDA-009]. The 'amendments' referred to in response to DL-004 in Written Summary of the Oral Submissions at the Open Floor Hearing 2 and the

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Applicant's Responses [REP4-088] are in respect of Abnormal Indivisible Loads only, and therefore do not change the assessment of transport effects in ES Volume 1, Chapter 13: Transport and Access [REP4-014] or any resultant effects on health as assessed in ES Chapter 18: Human Health [APP-070] .
HPC-014	Transport and Access	7. Rural Road Safety	The Applicant states that construction traffic will avoid Hullavington village centre. The Parish Council acknowledges this statement. However, this does not address the concerns raised during the Examination.	The applicant makes note of this comment.
HPC-015	Transport and Access	7. Rural Road Safety	The principal concerns relate to the Norton road towards the A429, the railway bridge, and the wider rural highway network used by pedestrians, cyclists, school children and elderly residents accessing local services and public transport.	Updated NMU surveys and Highways Technical Notes – Non-Motorised User Surveys [EN010168/EXAM/9.70] will be submitted at Deadline 6.
HPC-016	Transport and Access	7. Rural Road Safety	The Parish Council also draws the Examining Authority's attention to the particular challenges associated with	The Applicant refers to its response to HPC-005.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			leaving Hullavington at its northern end. This section of highway is constrained by visibility of on-coming traffic on a derestricted road and the absence of continuous pedestrian infrastructure. Both motorists and active travellers are required to negotiate these existing constraints daily. The Parish Council considers that the introduction of additional construction traffic has the potential to increase conflict between road users at this location and that the Applicant has not demonstrated, through a location-specific assessment, why these effects would not be significant.	
HPC-017	Transport and Access	7. Rural Road Safety	Avoidance of the village centre does not demonstrate that these constrained sections of highway can safely accommodate the predicted construction traffic.	Updated swept-path drawings and road width drawing showing geometries and proposed highway improvements are provided in Annex I and K of ES Volume 3 Appendix 13-1: Transport Assessment [REP5-061] . These drawings have been undertaken using topographical survey data and demonstrate regular opportunities for two HGVs to pass on the proposed construction routes.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
HPC-018	Transport and Access	7. Rural Road Safety	The Parish Council further notes that these routes are regularly used by both school transport and scheduled bus services. School buses serving Hullavington travel along Norton Road in both directions during the morning and afternoon school travel periods, including towards the A429 and towards Norton and Foxley before returning along the same routes later in the day. In addition, the scheduled bus service between Chippenham and Hullavington also uses Norton Road towards the A429.	Updated swept-path drawings and road width drawing showing geometries and proposed highway improvements are provided in Annex I and K of ES Volume 3 Appendix 13-1: Transport Assessment [REP5-061] . These drawings have been undertaken using topographical survey data and demonstrate regular opportunities for two HGVs (or a bus and an HGV to pass on the proposed construction routes.
HPC-019	Transport and Access	7. Rural Road Safety	These services operate at times when local traffic levels are already elevated and when children and other passengers are boarding or alighting from buses. The Parish Council considers that the interaction between construction HGVs, buses, private vehicles, pedestrians and cyclists on these constrained rural roads warrants specific consideration. The Parish Council therefore considers that these parish-specific concerns remain unresolved.	Updated swept-path drawings and road width drawing showing geometries and proposed highway improvements are provided in Annex I and K of ES Volume 3 Appendix 13-1: Transport Assessment [REP5-061] . These drawings have been undertaken using topographical survey data and demonstrate regular opportunities for two HGVs to pass, a bus and HGV to pass, a cyclist to pass an HGV and enough width for an HGV to pass a pedestrian. The Highways Technical Note – Non-Motorised User Surveys [EN010168/EXAM/9.70] submitted at

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Deadline 6 shows low pedestrian flows along this route for example 8 pedestrians on a weekday.
HPC-020	Description and DCO Process	8. Conclusion	Hullavington Parish Council respectfully submits that the Applicant's response contained within Document 9.52 does not fully engage with the parish-specific evidence presented during the Examination. In particular, the response: • relies extensively on references to previously submitted application documents rather than addressing the detailed evidence presented by Hullavington Parish Council; • reaches conclusions regarding transport impacts while confirming that elements of the construction traffic assessment remain under review; • relies on a proxy assessment rather than a location-specific assessment of Walk 8; and • does not adequately explain why the acknowledged changes affecting Hullavington would not result in significant adverse effects upon the local community.	The Applicant notes Hullavington Parish Council's concerns has responded to the specific points raised in HPC-002 to 019 above.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			The Parish Council respectfully requests that the Examining Authority give appropriate weight to these matters when considering the Applicant's evidence. In particular, the Parish Council considers that the Applicant's conclusions relating to transport impacts, pedestrian safety and community effects should be treated with appropriate caution until the revised transport evidence has been submitted, consulted upon and fully examined during the remainder of the Examination.	

Table 4-4 Hullavington Parish Council: Response to the ExA's Second Written Questions

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
HPC1-001	Socio-Economics, Tourism and Recreation	Importance of Hullavington Village Hall	The Examining Authority's Second Written Questions (ExQ2) - ExA have requested a response from Hullavington Parish Council, ref SE2.3. <i>SE2.3 The SoCG with Wiltshire Council, section 3.12.11, suggests a business compensation scheme [REP4-061]. Aside from the compensation to businesses there have been concerns raised by operators of community facilities that the proposal will result in their closure resulting from a lack of bookings during the construction, maintenance and decommissioning phases. Examples include [RR-2749], [RR-4315], [RR-4617]. All parties are asked to consider if they would be agreeable to a community facility compensation fund that would ensure they remain open and functional during the aforementioned phases and</i>	The Applicant notes this comment and confirms that it also considers village halls as important social, community, and recreational spaces.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<i>available for community use despite any negative effects of the proposed development.</i> <i>The applicant should note that simple reference to the Community Benefit Fund is not considered an appropriate response.</i> 1. Background and Importance of Hullavington Village Hall Hullavington Village Hall serves as the vital social, cultural, and recreational hub of our rural community. It is a key asset that hosts a wide variety of regular community groups, exercise and wellbeing classes, film nights, local council meetings, children's activities, and private event hire. As a community-run facility, the ongoing operational and maintenance costs of the Village Hall are funded entirely through user lettings and event attendance. The viability of the hall depends directly on maintaining regular attendance across all scheduled clubs, groups, and public events.	

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
HPC1-002	Transport and Access	Traffic	2. Impacts Arising from Construction, Operation, and Decommissioning While construction traffic and cable route works may not sit immediately adjacent to the physical boundary of Hullavington Village Hall itself, the extensive traffic disruption, potential road closures, and heavy goods vehicle (HGV) movements across the surrounding parish road network will severely affect access to the venue and jeopardise future community projects.	The construction route doesn't pass the Village Hall as it was avoided in the route selection process. The Applicant does not predict significant disruption that would cause a severe effect on the operation of the village hall.
HPC1-003	Transport and Access	Traffic	2.1. Traffic Disruption, Travel Delays, and Road Safety • Access Barriers for Attendees: A significant proportion of individuals attending clubs, wellbeing classes, and events at the Village Hall travel from surrounding hamlets and neighbouring villages. Construction traffic, temporary traffic signals, single-lane controls, and local road diversions will introduce significant travel delays and unpredictability. • Peak Activity Conflict: The majority of daytime and early-evening community groups, exercise classes,	The Outline CTMP includes measures to manage construction traffic including restricted delivery times. The route does not pass the Village Hall. The Applicants assessment doesn't predict significant delays. Updated swept-path drawings and road width drawing showing geometries and proposed highway improvements are provided in Annex I and K of ES Volume 3 Appendix 13-1: Transport Assessment [REP5-061] . These drawings have been undertaken using topographical survey data and demonstrate regular opportunities for two HGVs to pass on the proposed

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			and activities take place during peak operational hours for construction traffic. Drivers, cyclists, and pedestrians attempting to navigate narrow rural lanes alongside increased HGV volumes will face heightened road safety concerns. • Deterrence Factor: The inconvenience, prolonged travel times, and perceived hazards associated with traveling through construction zones will actively dissuade regular users and hirers from traveling to the Hall, leading attendees to drop out or seek alternative venues outside the affected area.	construction routes and to pass cyclists and pedestrians. As requested by the EXA further NMU surveys were undertaken, outlined in Highways Technical Note – Non-Motorised User Surveys [EN010168/EXAM/9.70], submitted at Deadline 6. The Applicant considers that there are enough passing places to allow through resulting in safety issues.
HPC1-004	Socio-Economics, Tourism and Recreation	Financial loss	2.2. Financial Impact • Loss of Existing Lettings Income: Any sustained drop in attendance directly threatens the income stream generated by regular group bookings and private event hires. The hall relies on this steady cash flow to cover fixed operational overheads including energy charges, insurance, annual ground rent and ongoing maintenance.	The Applicant notes this comment and refers to Technical Note on Impacts to Non-Equine Businesses [REP5-111] where the comments within Relevant Representations of concerns over the impacts to village halls have been raised and mitigation assessed. The Applicant has secured mitigation measures to control HGV movements and construction traffic movements within the Outline CTMP [REP5-083],

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				as secured by Requirement 15 of Schedule 2 to the Draft DCO [REP5-012] . The Applicant is confident that with these measures in place, access and therefore attendance of events at Hullavington Village Hall are not likely to be significantly affected, thus there is not considered to be any resultant significant effect on income to the village hall for its operation and maintenance.
HPC1-005	Socio-Economics, Tourism and Recreation	Financial loss	3. Threat to Future Community Expansion • Risk to Future Amenities via the Neighbourhood Development Plan (NDP): The Parish is actively working to secure dedicated community land through our Neighbourhood Development Plan to build essential amenities that Hullavington desperately needs. • Compounded Timing Crisis: Realising these critical new facilities requires significant initial fundraising, applying for design and construction grant awards, and establishing long-term self-funding mechanisms once operational. The proposed construction window for the Lime Down Solar Park directly overlaps	The Applicant acknowledges the concerns raised regarding the timing of construction and its perceived impact on the delivery of amenities identified within the Hullavington Neighbourhood Development Plan (NDP). The Applicant maintains that the potential impacts of the Scheme on community facilities and local residents have been fully and robustly assessed and has secured mitigation measures to control HGV movements and construction traffic movements within the Outline CTMP [REP5-083], as secured by Requirement 15 of Schedule 2 to the Draft DCO [REP5-012]. The Applicant is confident that with these measures in place, access and

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			with this pivotal delivery phase. A drop in village hall usage, reduced community engagement caused by widespread local disruption, and impaired fundraising capacity during construction puts the entire future of these planned amenities at serious risk.	therefore attendance of events at Hullavington Village Hall are not likely to be significantly affected, thus there is not considered to be any resultant significant effect on income to the village hall for its operation and maintenance. The Applicant does not consider that the Scheme would have any other effects on the ability for the parish council to develop plans for providing new community infrastructure. The Applicant is also committed to providing a Community Benefit Fund separately to the DCO process. This provides a potential opportunity for the Scheme to help contribute towards funding for community infrastructure in Hullavington, if the parish council wished to apply for said funding to support its own fundraising efforts. A decision on funding provision would be made by an independent fund administrator. Finally, the Community Liaison Group (CLG) and a dedicated Community Liaison Manager will act as

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				intermediaries to ensure facility operators are informed of site activities in advance and would allow for the synchronisation of community events or the building of community amenities and the Scheme's construction activities.
HPC1-006	Socio-Economics, Tourism and Recreation	Impact on Community Life	3. Impact on Community Life The Village Hall is more than a building. It is one of the few community-owned facilities that regularly brings people together. It provides opportunities for recreation, social contact, learning, volunteering and local decision-making. For many residents, particularly older people and those who live alone, these activities are an important part of community life. The effect of the Scheme should therefore not be viewed simply as a transport issue. If people attend less often, activities may become unviable, community groups may struggle to continue and opportunities for social interaction may be reduced. Even if those effects are difficult to measure, they are real and could have lasting consequences for the strength and resilience of the community.	The Applicant has secured mitigation measures to control HGV movements and construction traffic movements within the Outline CTMP [REP5-083], as secured by Requirement 15 of Schedule 2 to the Draft DCO [REP5-012]. The Applicant is confident that with these measures in place, access and therefore attendance of events at Hullavington Village Hall are not likely to be significantly affected. The Applicant understands the importance of community spaces such as village halls, and has sought to ensure that the mitigation measures secured at suitable to minimise adverse effects on their use. Indeed, the Applicant recognises the wider implications of transport and accessibility on personal and community health and wellbeing, and has reported on that interaction in ES Chapter 18:

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Human Health [APP-070] . This assesses the impact on severance, access to health and social infrastructure, and the visual impacts of the Scheme on community identity, demonstrating the interconnection between these determinants of health and wellbeing. The Applicant is confident that the Scheme includes sufficient design and mitigation measures to ensure no significant effects to health and wellbeing are anticipated.
HPC1-007	Socio-Economics, Tourism and Recreation	Hullavington Village Hall	4. Conclusion Hullavington Village Hall depends on people being able and willing to use it. The disruption associated with the Lime Down Solar Park has the potential to reduce attendance, weaken community participation, affect fundraising and undermine the long-term resilience of an important community asset. The impact should therefore be viewed not simply as a transport issue, but as an effect on a key element of the parish's social infrastructure and community life. Furthermore, plans to expand essential amenities on community land will be severely	The Applicant refers to its responses to HPC1-001 to HPC1-006 above and concludes that the Scheme is not anticipated to have a significant adverse effect on Hullavington Village Hall during construction, and therefore any phase of the Scheme thereafter.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			compromised, significantly reducing the likelihood of successfully delivering these vital facilities. The Planning Inspectorate is asked to give appropriate weight to the potential impact of the Scheme on the Hall, its users and the wider community it serves.	

4.4 Luckington and Alderton Parish Council

Table 4-5 Luckington and Alderton Parish Council: Responses to Examining Authority's Second Written Questions

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
LAPC-001	Description and DCO Process	ExQ2 DC02.20	This document constitutes the formal response of Luckington and Alderton Parish Council (LAPC) (IP Ref: to The Examining Authority's 2nd Written Questions and Request for Information (ExQ2) in respect of Lime Down Solar Park EN010168-002228. LAPC wish to make the following comments: <i>DCO2.20 Proposed New Requirement – Register of Requirements</i> <i>The ExA considers that it would be prudent for the applicant to maintain on a dedicated website a Register of Requirements to alert the general public, Parish Councils, community and/ or other stakeholders to the status of the control documents and to allow visibility of the approved documents. This is particularly important given the number of documents which require local planning authority approval, and</i>	The Applicant has confirmed with Wiltshire Council that it will upload all applications for the discharge of Requirements to its website where they can be viewed by stakeholders. As the discharging authority is Wiltshire Council, it is anticipated that the ordinary planning register would also be used as an appropriate location to share documents associated with applications to discharge the Requirements. The Community Liaison Group would also have direct access to information for information, consideration, and feedback (where appropriate) via the Community Liaison Manager who is appointed by the Applicant.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<i>given that several versions of the documents may be submitted to reflect a phased construction approach or a site by site approach. This type of requirement has precedent in The A122 (Lower Thames Crossing) Development Consent Order 2025 (Requirement 24). A link to National Highways' online register is here for example. The ExA considers that this would assist the local planning authority in terms of managing public, Parish Council and consultee contact and/ or any complaints before and during the construction phase; it would also assist the Community Liaison Group (CLG) which would be established pursuant to Requirement 4 of the dDCO.</i> <i>The ExA requests the applicant's consideration of this suggested new Requirement and welcomes the submission of draft wording, or a justification if it does not wish to take the Requirement forward.</i>	

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			Ref: DC02.20 LAPC would wish to express our support for the Proposed New Requirement – Register of Requirements suggested by the ExA. The Parish Council agree that the complexity of the project documentation and the challenges of ensuring the applicant's compliance to approved documents and would be greatly helped by the establishment and maintenance of such a website. The access to a single repository of approved and authoritative documents will benefit local communities by assisting the local planning authority in terms of managing public, Parish Council and consultee contact and/ or any complaints before and during the construction phase; it would also assist the Community Liaison Group (CLG) which would be established pursuant to Requirement 4 of the dDCO.	
LAPC-002	Socio-Economics, Tourism and Recreation	ExQ2 S.E 2.3	<i>Ref: ExQ2 SE2.3</i> <i>All Parties: The SoCG with Wiltshire Council, section 3.12.11, suggests a business compensation scheme [REP4-061]. Aside from the</i>	The Applicant notes this comment and confirms that it also considers village halls, and play spaces as important social, community, and recreational spaces.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<i>compensation to businesses there have been concerns raised by operators of community facilities that the proposal will result in their closure resulting from a lack of bookings during the construction, maintenance and decommissioning phases.</i> LAPC echo these concerns, and we feel that the protracted construction and commissioning phase is likely to have a very detrimental effect on community facilities and businesses within our parish. We have two village halls, a Community Pond and a Children's Playground which are run by small local charities and are dependent on generated revenue and donations to survive. All of these are likely to face significant financial disruption as a direct consequence of this proposed development. We consider the suggested Community Facility Compensation Fund a vital mechanism to ensure they remain open and functional during the aforementioned phases and available for community use despite any	Impacts to community infrastructure in Luckington and Alderton as a result of the Scheme are anticipated to be entirely based on visual impacts, as construction transport movements within the parish are limited to the Fosse Way, away from both villages. Impacts to visitors to the Alderton Conservation Area and Luckington Conservation Area (and thus also potential users of both village halls) and on the playground in Luckington, are set out in ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241], which finds no significant effect to any of these receptors. The Applicant therefore does not consider that compensation for community infrastructure impacts is necessary.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			negative effects of the proposed development.	
LAPC-003	Socio-Economics, Tourism and Recreation	ExQ2 SE 2.3	We do not consider the applicant's proposed Community Benefit Fund to be a viable mechanism to achieve this.	The Applicant considers that all necessary mitigation measures required to deliver the Scheme are secured through the requirements in Schedule 2 to the Draft DCO [REP5-012]. Any additional funding for community infrastructure is therefore an additional enhancement measure, and therefore it is the Applicant's position that the Community Benefit Fund would be the most appropriate mechanism.
LAPC-004	Socio-Economics, Tourism and Recreation	ExQ2 SE 2.3	In our view, the suggested Community Facility Compensation Fund should be administered by a publicly accountable, visibly independent and overtly regulated organisation such as Wiltshire Council. Similar processes in association with previous s.106 agreements have worked well and have established credibility within the local communities. Existing processes could be adapted to establish eligibility, priority and	See response to LAPC-002 above. The Applicant confirms that the provision of a Community Benefit Fund functions separately to the DCO process. This provides a potential opportunity for the Scheme to help contribute towards funding for new or enhanced community infrastructure. Parish Councils would be able to apply for said funding to support its own fundraising efforts. A decision on funding provision would be made by an

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			suitable criteria for applicants to the fund, and Wiltshire Council already have established consultation mechanisms with local Parish Councils to empower local decision making for such claims. We feel it is important that decision making rests with locally accountable public bodies and that the developer is not seen as an arbiter of claims for compensation so as to avoid potential conflicts of interest and undermining of the scheme's credibility.	independent fund administrator, not the Applicant or Wiltshire Council directly. This is standard practice for delivery of community funding for infrastructure projects.
LAPC-005	Socio-Economics, Tourism and Recreation	ExQ2 S.E 2.3	We would support a model similar in characteristics to the previously commonplace s.106 agreement model.	The Applicant has provided their reasoning for enhancements or community benefits are not appropriate to secure through Section 106 agreements within its response to question SE2.6 in The Applicant's Response to the Examining Authority's Second Written Questions [REP5-097] . Whilst this is written in respect of PRow's, the position remains the same in principle for other community infrastructure enhancements.

4.5 Sherston Parish Council

Table 4-6 Sherston Parish Council: Responses to Examining Authority's Second Written Questions

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
SPC-001	Transport and Access	Survey Cameras	Sherston Parish Council is writing to bring to the Examining Authority's attention the recent installation of survey cameras in Sherston Parish on the Norton Road, near the Fosse Way junction (What ThreeWords - movies.poses.humans) and potentially other places within the parish. They have also been noticed by Sherston residents on walks and cycle rides in neighbouring parishes. We understand that these cameras have been set up to conduct an active traveller survey at the request of the Examining Authority. We fully appreciate the need for traffic and user data, but many local residents have raised concerns regarding the lack of visible signage accompanying the cameras. To ensure local confidence and full compliance with standard procedures, we would be grateful if the Examining Authority could seek	The NMU surveys were undertaken on the local highway network, and permission was sought from WC prior to undertaking them. The Applicant refers to its response to HPC-001 in the Applicant's Response to Submissions received at Deadline 4 [REP5-098].

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			clarification from the applicant on the following key points:	
SPC-002	Transport and Access	Survey Cameras	1. Highway & Landowner Permission: Were the necessary consents and licences obtained from Wiltshire Council (as the highway authority) or the relevant landowner prior to installation?	The Applicant has sought the necessary licences required in connection with the surveys undertaken in May 2026 and July/August 2026. The relevant licensing requirements have therefore been appropriately considered and addressed in relation to both periods of survey work.
SPC-003	Transport and Access	Survey Cameras	2. Data Protection & Transparency: Under UK GDPR and ICO guidance, public camera surveys typically require clear signage at the site informing passers-by that recording is taking place, who is managing the data, and the purpose of the study.	The video camera pole had signage attached with contact details.
SPC-004	Transport and Access	Survey Cameras	Could the applicant confirm: Why no visible privacy signage was in place during the survey?	The video camera pole had signage attached with contact details.
SPC-005	Transport and Access	Survey Cameras	What lawful basis is being used for data collection, how the footage is being stored/handled, and when it will be deleted?	The surveys were undertaken by a third-party survey company in response to a request from the EXA in ISH3 in relation to a NSIP and with permission of WC. The data gets deleted after 6 months.
SPC-006	Transport and Access	Survey Cameras	Data gathered in public spaces needs to meet standard legal requirements. We therefore ask that the applicant confirms these compliance details	The Applicant refers to its response to SPC-002.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			before the survey results are formally admitted into the examination record.	
SPC-007	Transport and Access	Survey Cameras	Requested Action: We respectfully ask the Examining Authority to: Request written clarification on the above points from the applicant. Ensure the data meets standard UK GDPR requirements prior to reliance on its findings. Include this note in the formal examination record.	The Applicant notes this comment.

Table 4-7 Sherston Parish Council: Additional Submission – Accepted at the discretion of the ExA

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
SPC1-001	Transport and Access	Compensation Scheme	<i>SE2.3 Compensation for Community Facilities</i> <i>All Parties:</i> <i>The SoCG with Wiltshire Council, section 3.12.11, suggests a business compensation scheme [REP4-061]. Aside from the compensation to businesses there have been concerns raised by operators of community facilities that the proposal will result in their closure resulting from a lack of bookings during the construction, maintenance and decommissioning phases. Examples include [RR-2749], [RR-4315], [RR-4617]. All parties are asked to consider if they would be agreeable to a community facility compensation fund that would ensure they remain open and functional during the aforementioned phases and available for community use despite any negative effects of the proposed development.</i> <i>The applicant should note that simple reference to the Community Benefit</i>	The Applicant notes this comment on Sherston Parish Council's objection in principle to the Scheme, and has responded to the specific points raised in turn below.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<i>Fund is not considered an appropriate response.</i> <i>Wiltshire Council:</i> <i>You are asked to provide details of such a community facilities compensation scheme, including further justification, how this would work, including the administration, eligibility and what measures would prevent businesses from taking advantage of it. You are also asked to detail how this would fit within the structure of the DCO or if it should be implemented via a s106 agreement.</i> Sherston Parish Council is making a submission in response to question SE2.3. This question deals with the consideration of a community facility compensation scheme to prevent the closure of such facilities resulting from a lack of bookings during the construction, maintenance and decommissioning phases.	

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			Sherston Parish Council wishes to reiterate its most strong objection to the applicant's plans to build an industrial power project on an area of beautiful agricultural land that lies close to the boundary of Sherston village. Please note that the following response in no way represents an acceptance of the applicant's plan, nor a weakening of our negative assessment of the scheme, as set out in our previous representations.	
SPC1-002	Transport and Access	Traffic	Sherston has a number of community facilities and community run events that depend on outside patrons as well as local residents. Construction and decommissioning phases in particular will lead to such an increase in HGV traffic that access to Sherston via lanes from the M4 and Chippenham, via Norton as well as Grittleton, will be next to impossible. This will inevitably lead to fewer people coming into Sherston, both to use its facilities and to support its community events. Without compensation there would, without	The Applicant has secured mitigation measures to control HGV movements and construction traffic movements within the Outline CTMP [REP5-083] , as secured by Requirement 15 of Schedule 2 to the Draft DCO [REP5-012] . The Applicant is confident that with these measures in place, access to and therefore attendance of events and community facilities in Sherston are not likely to be significantly affected, thus there is not considered to be any resultant significant effect on income to any community facility reliant on bookings or visitor spending for its operation and maintenance.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			doubt, be some facilities and events that would not survive.	
SPC1-003	Transport and Access	Traffic	Notable facilities that would be impacted include: The Village Hall - this has recently obtained a wedding licence with the aim of increasing its income, and frequently hosts other parties and events as well as exercise classes and theatrical performances. The space outside hosts a small weekly market. The North Building - yoga classes, drama groups etc. British School Rooms- baby and toddler groups, choir rehearsals and other group activities. Holy Cross Sherston - a popular venue for wedding services and part of Gauzebrook group. Regular services are held at alternating churches within the group, and this depends on worshippers being able to move easily between the different village churches.	The facilities highlighted are all within the village centre of Sherston, and therefore are only affected by the Scheme in respect of construction traffic impacts on approach routes from the south (Norton, Hullavington, Grittleton). No other approaches are affected by the Scheme. The Applicant has secured mitigation measures to control HGV movements and construction traffic movements within the Outline CTMP [REP5-083], as secured by Requirement 15 of Schedule 2 to the Draft DCO [REP5-012]. As such, no significant effects to access to community facilities in Sherston is anticipated at any phase of the Scheme. Impacts on access to and demand for health services, such as at Tolsey Surgery, have been assessed in ES Volume 1, Chapter 18: Human Health [APP-070]. As a result of mitigation to reduce transport effects, there is no greater than a negligible adverse effect to access to healthcare services for

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			Tolsey surgery - this is widely used by residents whose villages do not have surgeries including Hullavington and Grittleton. Access to the Tolsey from these villages will be exceptionally difficult when lanes are blocked or being used by HGVs during the construction and decommissioning phases.	residents reaching the Tolsey surgery from locations such as Norton and Hullavington. Furthermore, uplift in demand from inbound construction workers is likely to result in a residual short- to medium-term temporary minor/negligible adverse effect on human health (not significant) as a result of negligibly increased demand on healthcare services. These are not significant effects. Access to Sherston to all road users will be maintained during construction, operation and decommissioning.
SPC1-004	Transport and Access	Traffic	Notable community events that would be impacted include: Boules weekend - an annual event that typically brings many visitors from all parts of the UK and also France. Please refer to the oral representation made at the last open hearing by a member of the Boules committee to understand how badly the applicant's proposed project would impact on this event and its future viability. Remembrance Sunday - this is attended by many more than purely Sherston residents and many of the	The Applicant has secured mitigation measures to control HGV movements and construction traffic movements within the Outline CTMP [REP5-083] as secured by Requirement 15 of Schedule 2 to the Draft DCO [REP5-012]. The Applicant is confident that with these measures in place, access to and therefore attendance of events in Sherston are not likely to be significantly affected. This document also secures commitment to considering arrangements for local events through

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			military who attend would come at present through Norton or Grittleton. It should be noted that events such as Boules and Remembrance Sunday are active community builders for Sherston and part of what makes it such a wonderful place to live. Monetary compensation will in no way properly compensate the Sherston community for the potential harm to such events.	the Final CTMPs following consultation with the Local Highway Authority. Additional coordination can be established through the Community Liaison Group and Stakeholder Communication Plan, as secured through the Outline CEMP [REP5-071] by Requirement 13 of Schedule 2 to the Draft DCO [REP5-012].

4.6 Yatton Keynell Parish Council

Table 4-8 Yatton Keynell Parish Council: Responses to Examining Authority's Second Written Questions

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
YKPC-001	Community Compensation	ExQ2 SE2.3 - Compensation for Community Facilities	1. Context This response addresses ExQ2 – Compensation for Community Facilities SE2.3. The Parish Council supports the principle of community facilities being compensated for loss of income as a result of construction activities (including the cable route).	The Applicant refers to its response to question SE2.3 in The Applicant's Response to the Examining Authority's Second Written Questions [REP5-097] . This considers that as no significant effects to community or recreational facilities are identified in the Environmental Statement. Furthermore, the Applicant has sought to ensure impacts to community facilities are mitigated through the measures already set out through the management plan secured by each of the relevant requirements in Schedule 2 to the Draft DCO [REP5-012] . Therefore, the Applicant maintains that a financial compensation mechanism for community facilities is not necessary.
YKPC-002	Community Benefit Fund	ExQ2 SE2.3 - Compensation for Community Facilities	1. Context This response addresses ExQ2 – Compensation for Community Facilities SE2.3. The Parish Council would also support the establishment of a wider Community Benefit	The Applicant confirms that the provision of a Community Benefit Fund is committed to separately to the DCO process. This provides a potential opportunity for the Scheme to help contribute towards funding for new or enhanced community infrastructure in

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			Fund funded by the applicant to enhance facilities within the communities affected by the project, to be funded annually based on output. This would be in line with other solar farm projects.	Yatton Keynell, if the parish council wished to apply for said funding to support its own fundraising efforts. A decision on funding provision would be made by an independent fund administrator, not the Applicant or Wiltshire Council. This is standard practice for delivery of community funding for infrastructure projects.

5 The Applicant's Response to Parties Mentioned in the Book of Reference

5.1 KMT Farming and Consultancy on behalf of Mr John Eavis and Mrs Rosemarie Eavis

Table 5-1 Mr John Eavis and Mrs Rosemarie Eavis: Responses to Examining Authority's Second Written Questions

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
KMTE-001	Description and DCO Process	ExQ CA2.5	<i>1. Context This response addresses ExQ2 CA2.5. The Owners do not repeat the substance of previous submissions but address the current position and the matters that remain unresolved since CAH1 on 30 June 2026.</i> <i>CA2.5 - Negotiations Q2 In light of ExQ2 CA2.4 put to the applicant, the ExA invites affected persons to submit comments at deadline 6 (Friday 21 August 2026) on the applicant's response to that question. Affected persons may, at the same time, wish to summarise their unresolved positions on the implications of the CA and Temporary Possession powers affecting their land, their rights or their businesses (although note that there is no need to repeat previous submissions</i>	The Applicant notes this comment and responds in full (KMTE-002 to KMTE-012).

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<i>which have been submitted into the examination).</i>	
KMTE-002	Description and DCO Process	Position since CAH1	2. Position since CAH1 Following CAH1, the Owners' agent engaged directly with the Applicant's agents on the outstanding issues in the voluntary negotiations. A detailed schedule of specific points was provided in writing, covering the principal areas of disagreement on the terms being offered and the basis on which the impact on the farm had been assessed. To date, no substantive response has been received. The Owners have followed up and are awaiting a reply. The voluntary negotiations are not progressing.	The Applicant refers to the Land and Rights Communication Log [REP5-093] which confirms the engagement to date and multiple meeting invitations extended to the landowner and their agent. The Applicant also refers to the Land and Rights Negotiation Tracker [REP5-020] which confirms Heads of Terms were reissued to their agent on 12 August 2026, alongside a schedule of substantive responses to queries raised by the landowner's agent. The landowner's agent has previously criticised the Applicant's responses to matters raised in relation to the Heads of Terms. However, the Applicant disagrees that negotiations are not progressing. The Applicant has responded to all points requested, insofar as it is reasonable and practicable currently. A significant proportion of the information sought by the landowner's agent relates to matters that cannot yet be confirmed due to the nature of nationally significant infrastructure

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				projects and the DCO process. Detailed information of the type requested will only become available if the DCO is consented and during the subsequent detailed design phase. The Applicant is therefore concerned that the landowner's agent may not be fully advising their clients as to the distinction between the level of detail available currently and that which will become available at detailed design stage. As a result, the apparent frustration expressed by the landowner's agent appears to stem largely from the current unavailability of information that does not yet exist, rather than any unwillingness on the part of the Applicant to engage constructively in negotiations. Notwithstanding this, and in light of the extensive number of points most recently raised by the landowner's agent, the Applicant has taken note of criticism of the Applicant's previous responses by the landowner's agent and taken care to provide comprehensive responses that assist the progression of negotiations towards a voluntary agreement. This has included directing

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				the landowner's agent to relevant documents within the DCO Examination Library and providing specific signposting to information pertinent to the landowner's interests and landholding.
KMTE-003	Description and DCO Process	Position since CAH1	The Owners draw this to the Examining Authority's attention because it is directly relevant to ExQ2 CA2.4. The question is not whether contact has taken place — it has, and that is documented. The question is whether the Applicant is genuinely seeking to reach voluntary agreement on terms that properly reflect what is being sought and its true impact on the farm business. On that question, the evidence since CAH1 points only in one direction.	The Applicant does not accept the implication that it is not genuinely seeking to reach a voluntary agreement. The Applicant remains committed to working constructively with the landowner and their agent to secure a voluntary agreement and has continued to engage throughout the process with that objective in mind. Furthermore, the statement made by the landowner's agent is not reflective of the nature of conversations that have taken place to date between the parties. The rights sought by the Applicant are clearly identified and set out within the Heads of Terms. The Applicant has explained the rights sought at length with the landowner's agent, and whilst they assert that the impact to the existing farm business has not been properly assessed [KMTE-006], they have not provided any evidence, rationale, or justification to substantiate that view,

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				despite requests to do so by the Applicant. The Applicant considers that the principles underpinning the compensation offered are consistent with the approach taken for projects of this nature. The Applicant notes that limited substantive feedback has been received on the commercial offering. To assist meaningful progression of negotiations, the Applicant would welcome tangible and detailed feedback from the landowner's agent on the commercial proposals, including any specific areas of disagreement.
KMTE-004	Description and DCO Process	Principles in Issue	3. The principles in issue The Owners' position rests on three connected principles, each of which goes to the heart of the ExQ2 CA2.4 question. The rights being sought must be the minimum necessary. This remains confused as the Applicant is both requesting rights in addition to those sought in the DCO, and also suggesting there may be	The Applicant addresses this issue in the response provided to KMTE-007.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			some limits and revisions to rights set out in the DCO.	
KMTE-005	Description and DCO Process	Principles in Issue	Engagement must be conducted on the basis of the full extent of the rights sought. The voluntary agreements refer to specific areas of the DCO and do not stand alone as contractual documents.	The Applicant requests clarification from the landowner and their agent on the specific areas of the DCO they are referring to. Part of the DCO application is seeking planning permission for the construction, operation, maintenance and decommissioning of the Scheme and therefore the voluntary agreements reflect certain provisions within the DCO that the Applicant will be legally bound to comply with if the DCO is consented.
KMTE-006	Description and DCO Process	Principles in Issue	The assessment of loss must reflect the true impact. Very little engagement has taken place on the commercial or compensatory elements of a voluntary agreement as the scope of the rights required cannot be established clearly.	The Applicant has provided the landowner and their agent with a full breakdown of the commercial offering proposed by the Applicant based on the rights sought through the voluntary agreement. The scope of rights required has been assessed on the reasonably worst-case scenario at this stage. The rights will become more refined during the detailed design stage that will happen if the DCO application is consented. It is during the detailed design phase that there may be opportunities to further narrow the scope of rights sought. The Applicant notes that limited substantive feedback has

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				been provided on the commercial offering. To assist meaningful progression of negotiations, the Applicant would welcome tangible and detailed feedback from the landowner's agent on the commercial proposals, including any specific areas of disagreement. The Applicant remains willing to engage further on this issue.
KMTE-007	Description and DCO Process	Summary of Unresolved Position	4. Summary of unresolved position The Owners' unresolved position in respect of plots 05-043 and 06-001 to 06-006 can be stated concisely: 1. The rights are disproportionate. The Order Limits and the rights sought have not been demonstrated to be the minimum necessary for this specific landholding.	The Applicant considers the rights sought are proportionate and justified within the Statement of Reasons [APP-018]. Within ES Volume 1, Chapter 6: Environmental Impact Assessment Methodology [APP-058] the Applicant explains the 'Rochdale Envelope' approach taken. The Applicant therefore considers the Order Limits to provide the minimum amount of land required at this stage of the Scheme. This is to ensure the Scheme has the required flexibility during the detailed design phase to narrow down the land required for the construction of the Scheme. This is pertinent in relation to plots 05-043, 06-001 and 06-006 where the micro-siting of

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Interconnecting Cables between Lime Down D and E will be confirmed during detailed design post-consent.
KMTE-008	Description and DCO Process Socio-Economics, Tourism and Recreation	Summary of Unresolved Position	2. The full impact has not been assessed or engaged on. The true affected area — approximately 110 acres including severed land outside the Order Limits — and the full consequences for the farm business over a 60-year project life have not been properly assessed or reflected in the voluntary negotiations.	The Applicant's commercial offer has been prepared on the basis of the established compensation code and reflects the rights and interests being sought. The Applicant considers that the principles underpinning its offer are consistent with the approach ordinarily adopted for projects of this nature. The Applicant does not consider that any of the landowner's holding will be permanently severed, owing to its current use as agricultural land, which will be reinstated following construction of the project and available to be used as it is currently. The Applicant has raised mitigation measures that would be available to the landowner during the construction phase in meetings held with the landowners and their agent. The Applicant is very keen to progress these discussions in further detail so as to mitigate any losses arising from the construction works. As a result, the Applicant is confident that the full impact of the Scheme on the

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				farm business has been properly assessed to determine the voluntary agreement sought with the landowner. The physical impacts of the Scheme are temporary and land will be restored once works are completed. Therefore, there is no long-term effect to the farming business anticipated as a result of the Scheme.
KMTE-009	Description and DCO Process	Summary of Unresolved Position	3. The engagement obligation has not been met. Voluntary negotiations have not been conducted on the basis of a clearly defined extent of rights sought and it is impossible to consider Compensation Code-based assessment of impact.	The Applicant requests the landowner's agent provide clarification on where the rights sought in the voluntary agreement have not been clearly defined. The Applicant notes that limited substantive feedback has been provided on the commercial offering. To assist meaningful progression of negotiations, the Applicant would welcome tangible and detailed feedback from the landowner's agent on the commercial proposals, including any specific areas of disagreement.
KMTE-010	Description and DCO Process	Summary of Unresolved Position	4. The CA case has not been made out. On any analysis the position remains extremely confused — the rights in DCO are disproportionate, or they accurately reflect the requirement and the full impact has not been assessed — the compelling	The Applicant refers to its response to KMTE-007.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			case test for this landholding is not satisfied.	
KMTE-011	Description and DCO Process	Request for Second CAH	5. Request for a second compulsory acquisition hearing The Owners submit that a second compulsory acquisition hearing would assist the Examination. The purpose would not be to repeat previous submissions but to allow the Examining Authority to assess directly whether genuine progress has been made since CAH1 — specifically: • Whether the Applicant has provided substantive responses to the issues raised by affected persons since CAH1; • Whether voluntary negotiations are being conducted appropriately and meaningfully; • Whether a proper assessment of the impact on affected farm businesses has been, or can be, conducted; and • Whether the Applicant can answer the questions asked at CAH1. A second hearing would provide the Examining Authority with an	While the Applicant does not consider a further CAH hearing strictly necessary, the Applicant is not opposed to this if the Examining Authority considers it appropriate. Despite ongoing engagement, the Applicant has not received any substantive feedback on the commercial terms offered through the proposed voluntary agreement. In particular, no detailed commentary, counterproposal, or reasoned response has been provided that would enable the Applicant to understand the landowner's position or progress negotiations towards agreement. In these circumstances, the Applicant considers it appropriate for the Examining Authority to explore the nature and effectiveness of the engagement undertaken on behalf of the landowner, including whether negotiations are being conducted in a manner that facilitates genuine consideration of the Applicant's

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			appropriate mechanism to gauge whether the Applicant's approach to voluntary negotiations meets the standard required by the guidance — or whether the gap between the DCO position and the voluntary discussions identified at CAH1 persists.	proposals and the reasonable prospect of reaching agreement. The Applicant furthermore considers that an appropriate assessment on the farming industry and farming business on the Cable Route Corridor has been provided through ES Volume 1, Chapter 16: Socio Economics, Tourism and Recreation [APP-068] and Chapter 17: Soils and Agriculture [REP3-021] .
KMTE-012	Description and DCO Process	Conclusion	6. Conclusion The Owners remain willing to engage constructively and to reach voluntary agreement on appropriate terms. They are not seeking to obstruct the examination. They are asking for what the guidance and the law require: engagement on the full picture, terms that reflect the genuine impact, and rights that are the minimum necessary. On the evidence available at this deadline, the Applicant has not demonstrated that it has met those requirements in respect of Manor	The Applicant notes this comment and has responded in full above and welcomes continued engagement with The Owners.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			Farm. The Owners ask the Examining Authority to take that into account in its assessment of the CA justification case for these plots, and to consider whether a second compulsory acquisition hearing would assist.	

5.2 Dr Peter Phillips

Table 5-2 Dr Peter Phillips: Comments on any submissions received at Deadline 4

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
PR-001	Description and DCO Process	Maps and Plans	I gave oral evidence to the inspector I followed that up with planning consents and plans for the inspector as requested. I have received further communication from Lime Down and a further plan from them The plan they have now sent has not been altered from the original one in any way and so is still wrong .	The Applicant has agreed to provide an updated option plan to clearly define the new access track ahead of the meeting between the Applicant and the respondent scheduled for 1 September. The Applicant is cognisant that further alterations may be required to the location of the access point and track in future, and is committed to continued engagement on this matter.
PR-002	Hydrology, Flood Risk and Drainage	Local Flooding	I am now being asked to give them information about flooding in the area which has been significant problem . I would have thought they would need to provide a flood risk survey.	The Applicant notes the comment. The Scheme is already supported by a comprehensive suite of site-specific Flood Risk Assessments and Drainage Strategies, which assess flood risk from all relevant sources using available mapping, survey information and, where proportionate, hydraulic modelling. The request for information on local flooding was intended to supplement that assessment with local evidence, not

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				replace the Applicant's flood risk assessment. Any relevant information provided will be considered alongside the technical evidence already submitted.
PR-003	Consultation and Engagement	Communications	I have replied to their communications but have received nothing in response To say the least this is being handled in a highly unprofessional manner.	The Applicant acknowledges the respondent's comments and reaffirms that correspondence is being undertaken with the respondent's land agent. A record of this communication can be found in the Land and Rights Negotiations Tracker [REP5-020] and the Land and Rights Communication Log [REP5-093] . A further meeting with the respondent and their land agent has also been scheduled for 1 st September to discuss the voluntary heads of terms.
PR-004	Description and DCO Process	Further Evidence	Unless anything changes regarding the approach by Lime Down I would wish to present oral evidence to the inspector at the next opportunity and before the enquiry is completed	The Applicant notes this comment and welcomes continued engagement.

5.3 Bridget Marie Gregory

Table 5-3 Bridget Marie Gregory: Any further information requested by the ExA

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
BMG-001	Consultation and Engagement	Liaison Regarding Private Assets	Further to the Applicant's response to my response to the Examining Authority's first written questions, table 2.17 Exam/9.45: Paragraph 2 the Applicant has excluded pre-construction liaison with the tenants regarding potential interference with the private asset slurry lagoon during cable laying. Since the tenant has day to day management of the relevant land it would be essential to include the tenant in these discussions.	The Applicant notes the comments made by the respondent. Throughout the Project, the Applicant has adopted the position of engaging with the freeholders of the site and agreeing the terms under the voluntary Heads of Terms prior to engaging with the tenants. The Applicant is open to accommodating tri-partite agreements where required and express confirmation is received from the landowner.

5.4 Jonathan Seymour-Williams

Table 5-4 Jonathan Seymour-Williams: Comments on any submissions received at Deadline 4

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
JSW-001	Transport and Access Noise and Vibration	Road Damage and Noise Impact	Two items come together on the Cottages No 1-4 Pig lane. I am the owner of [REDACTED] and am concerned at the Road damage and Noise from the access to the Pig lane Rail Crossing.	The Applicant confirms that the Order Limits extend only across the very northern section of Pig Lane, less than 250 m from Fosse Way. As such, construction routes and access points do not extend far enough along Pig Lane to give rise to adverse noise effects at Pig Lane Cottages, Farleaze Farm or the Pig Lane Rail Crossing. With the exception of the crossing point south of the railway bridge, which links Fields C15 and C16, the number of vehicles crossing Pig Lane between C15 and C16 will be negligible, as this route only provides access to a small part of the development.
JSW-002	Site Selection and Alternatives	Location of Cable Route	The applicant has stated that the field 1260 shown on the plan attached that surrounds the Cottages is NOT included within the Red Line and the applicant has stated that there will be no cable down Pig lane. However it appears from HMLR searches on the field concerned that there is a probability that the cable route will	The Applicant can confirm that the parcel as referenced 1260 on the plan provided lies outside of the order limits. This can be seen in the Works Plan [APP-007] document on sheet 4.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			cross the field concerned no 1260 and that the applicant HAS included the field within their option.	
JSW-003	Hydrology, Flood Risk and Drainage	Flood Risk to Farleaze Farm	In response to ExA question FHW2 point 11 a question has been raised and addressed to the Applicant about the flood risk to Farleaze Farm. As the owner and having lived here for 30 years the whole Farleaze triangle has been severely affected by flooding in approximately 10 of those 30 years and is adversely affected most year at intervals.	The Applicant notes the landowner's evidence regarding the frequency of flooding at Farleaze Farm. This is consistent with the Applicant's recognition in FHW2.11 that there is an existing local drainage and flooding issue around the low point adjacent to the railway culvert. The Scheme-specific implications for Farleaze Farm have been assessed in FHW2.11, which concludes that the Scheme will not materially increase or redirect surface water runoff towards the property or the railway drainage system. The Applicant recommends that the landowner engage further with Network Rail regarding their concerns on this issue.
JSW-004	Hydrology, Flood Risk and Drainage	Flood Risk to Farleaze Farm	This impact is exacerbated by the Railway that interacts with the natural West-East drainage and flood zone because the Railway itself	The Applicant notes the landowner's observations regarding the interaction between the railway and local drainage.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			slopes East-West and even in normal years is subject to pumped water from Aldreton and beyond which is pumped back on to the Fosseway and hence back through Farleaze Farm towards Norton or Hullavington.	The Applicant's assessment in FHW2.11 recognises that the existing flooding mechanism is associated with the low point around the railway drainage infrastructure and the conveyance of surface water through that system. The specific operational arrangements described by the landowner, including pumped flows from outside the immediate area, are not within the Applicant's control and have not been independently verified. The Scheme does not rely on alteration of the railway drainage system and will not materially increase or redirect runoff towards it. The applicant recommends that the landowner engage with Network Rail regarding their concerns on the performance of Network Rail assets.
JSW-005	Hydrology, Flood Risk and Drainage	Flood Risk to Farleaze Farm	No body from the Applicant has done a full survey in all levels of flooding or drought to see this impact and I will upload photos where available.	The Applicant does not agree that a full survey across all flood and drought conditions is required to assess the effect of the Scheme. The Applicant has reviewed the local topography, surface water mapping and drainage features around Farleaze Farm

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				and has undertaken site engagement with the landowner. The Scheme-specific assessment is set out in FHW2.11. Any photographs or further local evidence submitted by the landowner will be considered alongside the existing technical evidence, but do not alter the requirement for the Applicant to assess whether the Scheme itself would increase flood risk.
JSW-006	Hydrology, Flood Risk and Drainage	Flood Risk to Farleaze Farm	At the moment Network Rail have instigated major works to the railway embankment from Aldreton to Farleaze and at the Piglane crossing (low point) and as the owner and contingent to both works I have discovered that neither contractor has had full discussions on the impact of the railway drainage on the flooding at Farleaze- it is likely to worsen the situation as run-off will be increased.	The Applicant notes the landowner's concerns regarding the current Network Rail works. Those works are separate from the Scheme. The Applicant is in ongoing discussions with Network Rail regarding protective provisions, a Framework Agreement and the interface between Network Rail's works and the Scheme. The Scheme does not rely upon the Network Rail works to manage flood risk. As set out in FHW2.11, the Scheme will not materially increase or redirect surface water runoff towards

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Farleaze Farm or the railway drainage system. Any changes to runoff or drainage arising from Network Rail's works are matters for Network Rail to assess and manage.
JSW-007	Hydrology, Flood Risk and Drainage	Access to Farleaze Farm	None of these works or drainage operations can be completed without access from Pig lane and across Farleaze Farm.	The Applicant has highlighted the proposed access points off Pig Lane within the Access Plan [REP5-010] sheet 4. The Applicant can confirm that this proposed access point (reference 2a and 2b) does not lead onto or pass over Farleaze Farm.
JSW-008	Description and DCO Process	Supporting Maps and Images	Applicant note: JSW submitted an OS map and supporting images, which can be viewed here .	The Applicant notes the supporting maps and images.

5.5 Angus Methuen-Campbell (The Corsham Estate)

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
CE-001	Scheme Description and DCO Process	Estate objection	The Corsham Estate objects to the Lime Down Solar Project and the compulsory powers sought through the Development Consent Order ("DCO") application.	The Applicant notes the Corsham Estate's objection. The Applicant has responded to the specific matters raised in responses CE-003 to CE-011 below.
CE-002	Soils and Agriculture	Estate impacts	Whilst the Estate has significant concerns regarding the overall impact of the scheme on the Estate, its landholdings and its tenant farming businesses, a particular concern arises from the extent of land included within the proposed Order Limits.	The Applicant refers to its response to CE-003.
CE-003	Scheme Description and DCO Process	Order Limits	The area of the Corsham Estate currently affected by the DCO extends to approximately 80 hectares. However, based on the information currently available, the actual land required for installation of the proposed cable route appears to comprise only some 14 hectares, together with approximately 1 hectare for temporary construction compounds. On that basis, it is difficult to understand why compulsory powers are being sought	As the final route of the grid connection cannot be determined until the detailed design stage, the Cable Route Corridor contains sufficient flexibility for the cables to be micro-sited. Where there are specific constraints, such as a railway crossing, the flexibility required for micro-siting is greater than in other areas along the route. Compulsory acquisition powers are being sought over the entire area in which the cables could be located. However, the powers

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			over a further 65 hectares of Estate land.	would only be exercised in respect of the land actually required for the works.
CE-004	Scheme Description and DCO Process	Route uncertainty	The Estate understands that much of this additional land has been included because the Applicant has not yet determined its preferred means of crossing the railway line between Easton and Thingley. Whilst the Applicant may wish to retain flexibility pending further investigations, it is inappropriate for such uncertainty to be transferred to affected landowners and occupiers through the inclusion of extensive areas of land for which no clearly defined requirement has been demonstrated.	Within ES Volume 1, Chapter 6: Environmental Impact Assessment Methodology [APP-058] the Applicant explains the 'Rochdale Envelope' approach taken to ensure the Scheme has included and assessed the required flexibility. This is pertinent where the micro-siting of grid connection cables is not yet known owing to engineering constraints including the crossing of the railway.
CE-005	Scheme Description and DCO Process	Compulsory powers	The compulsory acquisition and temporary possession powers available under the DCO regime are exceptional powers and must be shown to be necessary, proportionate and justified. At present, the Applicant has not adequately demonstrated why such an extensive area of additional land is required, and the Estate considers the Order Limits to be materially overstated.	The land requirements of the Scheme, including the extent of the Order Limits and the powers sought, have been clearly identified in the DCO application and subject to consultation and examination. The Applicant considers the rights sought are proportionate and justified within the Statement of Reasons [APP-018] .

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				The Applicant has engaged at length with the landowner's agent on the points raised, the detail of which can be found in the Land and Rights Communication Log [REP5-093] and to date, the agent has refused to discuss any of the contents of the Heads of Terms beyond the commercial figure proposed by the Applicant. The Applicant wishes to progress the wider Heads of Terms with the landowner so that concerns cited in their responses here can be properly addressed.
CE-006	Soils and Agriculture	Farm viability	This uncertainty is causing particular concern in relation to Easton Court Farm and Thingley Court Farm. Easton Court Farm is the last remaining dairy farm on the Corsham Estate, extending to approximately 75 hectares, whilst Thingley Court Farm comprises approximately 80 hectares and supports a separate livestock enterprise. Together, the farms support two independent tenant families whose livelihoods depend upon the continued viability of their farming businesses.	The Applicant has been engaging with the landowners of Easton Court Farm and Thingley Court Farm (the Corsham Estate) through its negotiation of Heads of Terms for establishing voluntary agreement of compensation for losses to farming businesses on the Cable Route Corridor. It is considered that this compensation will be sufficient to ensure the continued viability of those farming businesses is maintained through temporary construction works.
CE-007	Soils and Agriculture	Farm uncertainty	It is estimated that approximately 40% of the combined area of the two	The Applicant acknowledges that at this stage, the Scheme requires flexibility in

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			holdings falls within the current DCO boundary, with 21 of the 32 field parcels potentially affected. As matters stand, neither the Estate nor its tenants are able to determine with any certainty which land parcels, access routes, drainage systems, and farming operations will ultimately be affected by the scheme. This makes meaningful forward planning extremely difficult and significantly hampers the ability of both the Estate and its tenants to make informed representations during the examination process.	the final routing design of the Cable Route Corridor. The primary reason for this is the location for crossing the Great Western Main Line railway. The exact location and methodology for the crossing of the railway will be subject to the approval of Network Rail. The Applicant understands how this may create uncertainty at this stage in the process for the landowner and tenants affected by the inclusion of their land within the Order limits. The Applicant is however, committed to ensuring landowners and stakeholders are kept engaged as the final design of the Cable Route Corridor is undertaken following DCO consent being granted. This would allow matters such as access, land drainage, field boundaries, and farming operations to be fully considered. This would be through direct engagement, or through the wider Stakeholder Communication Plan, as secured through the Outline CEMP [REP5-071] by Requirement 13 of Schedule 2 to the Draft DCO [REP5-012].

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
CE-008	Soils and Agriculture	Agricultural disruption	Without a clearly defined cable route, it is impossible properly to assess the extent of agricultural disruption, impacts on livestock and dairy operations, effects on drainage and soil management, potential severance of holdings, biosecurity risks, reinstatement proposals and the long-term consequences for the viability of the affected businesses.	The Applicant understands that the uncertainty around the location of the final Cable Route Corridor is a concern for the landowner and farm business at this location. The final Cable Route Corridor will typically have a working width of approximately 30 m within the Order limits, with potentially larger areas needed for drilling entry/exit pits where the railway crossing is located. The Applicant will liaise with the landowner and farm businesses as part of the detailed design process to understand any specific concerns or measures that will need to put in place relating to the matters raise.
CE-009	Soils and Agriculture	Land take	The Estate therefore objects both to the proposed development and to the excessive extent of land currently included within the Order Limits. The current approach exposes productive agricultural land and established tenant farming businesses to significant uncertainty and potential harm, whilst seeking compulsory powers over land for which no proven requirement has yet been established.	With regard to the use of agricultural land, ES Volume 1 Chapter 17: Soils and Agriculture [REP3-021] confirms that at decommissioning, all land will be returned to its original use and condition as far as is practicable and returned to the landowner, with temporary moderate beneficial effects on soils resources (assessed as a significant effect) as a result of the soil being undisturbed under long-term grassland for the duration of the Scheme. In relation to land within the cable route corridor, as

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				set out in the ES Volume 1, Chapter 3 The Scheme [APP-055], following installation of the cables the construction working area would be fully reinstated back to its original condition, and farming activities could be continued. The Applicant is committed to ensuring landowners and other stakeholders are kept engaged as the final design of the Cable Route Corridor is undertaken following DCO consent being granted. This would allow matters such as access, land drainage, field boundaries, and farming operations to be fully considered. This would be through direct engagement, or through the wider Stakeholder Communication Plan, as secured through the Outline CEMP [REP5-071] by Requirement 13 of Schedule 2 to the Draft DCO [REP5-012]. Furthermore, the Applicant is actively engaged with the landowner's agent to negotiate the Heads of Terms for the rights being sought. Details of these negotiations can be found in the Land and Rights Negotiation Tracker [REP5-020] and the Land and Rights

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Communication Log [REP5-093] , however to date, the landowner's agent has not provided any substantive feedback on the Heads of Terms beyond the commercial proposal.
CE-10	Consultation and Engagement	Examination participation	The uncertainty created by the Applicant's approach is itself prejudicial to affected landowners and occupiers, and undermines their ability to participate effectively in the DCO examination process.	The Applicant refers to the Land and Rights Communication Log [REP5-093] and the Land and Rights Negotiation Tracker [REP5-020] which confirms the engagement to date and multiple meeting invitations extended to the landowner and their agent to progress voluntary agreements. The Applicant has consistently sought to engage constructively with the landowner and their agent. Despite the Applicant's best endeavours to engage, the Applicant has received limited feedback on the substance of the rights sought or the commercial terms offered. The Applicant considers that negotiations would be assisted by more specific commentary identifying the particular areas of concern. The Applicant remains committed to working with the landowner and their representatives to reach a voluntary agreement.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
CE-011	Scheme Description and DCO Process	Land justification	The Estate respectfully requests that the Examining Authority scrutinise carefully the justification for the land included within the Order Limits and require the Applicant to demonstrate that any land over which compulsory powers are sought is genuinely necessary for the authorised development.	For the reasons set out above, the Applicant considers that the nature and extent of the compulsory acquisition powers being sought is necessary and proportionate.

6 The Applicant's Response to Members of Public and All Remaining Organisations and Businesses

6.1 Oliver John Francis

Table 6-1 Oliver John Francis: Comments on any submissions received at Deadline 4

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
OJF-001	Soils and Agriculture	Use of Agricultural Land	Application had been submitted which every person I talk to feels we are destroying of farmland	There will be no destruction of farmland. As detailed in ES Volume 1 Chapter 17: Soils and Agriculture [REP3-021] , the primary use of the land for agricultural production in the Solar PV Sites will cease, however the land will remain in-situ, mostly undisturbed, and will continue to fulfil other ecological functions for the lifetime of the Scheme.
OJF-002	Climate Change and Energy Need	Need	to allow commercial companies to make profits large profits NOT considering the damage it will do when we see other China India increasing the number of power generators using fossil power	Paragraph 3.2.3 of NPS EN-1 (2023) explains that <i>"It is for industry to propose new energy infrastructure projects that they assess to be viable within the strategic framework set by government. This is the nature of a market-based energy system."</i> The Statement of Need [REP1-085] explains why the Scheme is urgently needed at the scale proposed; why the proposed location is appropriate for the Scheme; and how the Scheme addresses all relevant aspects of

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				established and emerging government energy and climate change policy and commitments. Planning balance has been applied as set out in section 9 of the Planning Statement [REP3-081], which considers the positive, neutral and negative impacts of the Scheme and weighs them up to conclude that there are no adverse impacts of sufficient weight, either along or collectively, that would mean the development consent order should not be made.
OJF-003	Soils and Agriculture	Food production	so why why destroy our countryside which will be required for food production	The Farming and Food Security Technical Note [REP4-079] demonstrates that the use of the agricultural land for this Scheme will have no effect on the local and national crop yield or food security.

6.2 Geoffrey Philipps

Table 6-2 Comments to the Applicant's Responses to Written Summary of Oral Submissions at the Open Floor Hearings

Reference	Applicant's resume of original comment	Applicant's Response to Oral Submission	Comment to Response	Applicant's Response
GP-001	Mr. Philipps introduced himself as a local resident who lives on Mill Lane, Corston, and spends a lot of time in his garden which has a 300metre frontage to the Gauze Brook and bridleway MALW 51. He referenced Storm Bert in November 2024 which caused the Brook to flood 17 times that winter, with the increased runoff identified by Professor Skeffington which will increase the speed at which waters rise. This means that A429 bridge gets more easily overwhelmed, raising the flood level and increasing risk to Corston Residents.	The Applicant notes Mr Philipps' comments regarding existing flooding from the Gauze Brook at Corston, including the flooding experienced during and a er Storm Bert. The Applicant does not dispute that Gauze Brook is an existing source of flood risk during high flow conditions. The relevant question for the DCO is whether the Scheme would materially increase flood risk to Corston or worsen flooding at existing downstream structures, including the A429 bridge. The Applicant does not agree that the Scheme would increase	Environmental Statement Volume 3, Flood Risk Assessment and Outline Drainage Strategy – Lime Down D / BESS addresses the flood risk within the confines of Lime Down only and all the maps are limited to the site and in particular do not address any potential impact down stream of D13 or D14 (which are stated as being in flood zones 2/3) except for paragraph 2.4.4 which states: "any potential surface water flooding arising at or near to Lime Down D would be directed eastwards, away from Lime Down D, following the local topography and the	The Applicant notes Mr Philipps' comments regarding existing flooding at Corston and does not dispute that Gauze Brook is an existing source of flood risk during high-flow conditions. The Scheme-wide assessment does not rely on detailed downstream hydraulic modelling at every location. The assessment approach is proportionate to the potential effects of the Scheme. Across the Scheme, the site-specific FRAs and Drainage Strategies, together with the

Reference	Applicant's resume of original comment	Applicant's Response to Oral Submission	Comment to Response	Applicant's Response
	This would render stillborn and thoughts on flood alleviation by the local Council should Lime Down go ahead.	runoff in a way that would cause Gauze Brook to rise more quickly, increase flood levels at Corston, or undermine potential future flood alleviation measures. The flood risk assessment for Lime Down D has been informed by hydraulic modelling of Gauze Brook. The submitted assessment does not identify a material increase in flood risk to Corston as a result of the Scheme. Solar PV panels would be elevated above ground and would not operate as impermeable hardstanding or as a connected drainage catchment. Rainfall would continue to drain to ground beneath and between the panel rows.	watercourses." Furthermore 2.9.1 states: "It can be concluded that the risk to Lime Down D from all sources of flooding is Negligible to Flood Risk". Downstream of D13 & D14 the available flood plain narrows substantially and as Gauze Brook enters Corston it is approximately 60m wide between the 75m contours with the river bank at 70.58m AOD some 4m below the level of D14 where the 75m contours are some 500m apart according to OS Maps. There appears no consideration of the flood risk to Corston as implied in the applicant's	secured soil, vegetation and construction management measures, demonstrate that the Scheme will not materially increase runoff or flood risk off-site. Positively drained hardstanding will be attenuated and discharged at restricted rates, while the Solar PV Panelled Areas will remain predominantly permeable and are subject to the soil, vegetation, erosion and runoff controls established through the relevant management plans. For Lime Down D specifically, additional hydraulic assessment has been undertaken because Gauze Brook is a Main River and represents one of the

Reference	Applicant's resume of original comment	Applicant's Response to Oral Submission	Comment to Response	Applicant's Response
		Formal impermeable infrastructure would be subject to controlled drainage, a attenuation and discharge controls through the relevant FRA and Drainage Strategy and the detailed drainage design secured under Requirement 11: Surface Water Drainage of the Dra DCO [REP3-005]. Construction phase runoff, sediment mobilisation and soil compaction risks would be managed through the Outline CEMP [REP3-092] and Outline Soil Resources Management Plan [REP3-098]. On this basis, the Applicant does not agree that the Scheme would materially increase flood risk to Corston or make	response. The water course further narrows to pass under the A429 bridge. It is noted that the recommendation is that the panels be located 600m above the ground presumably to ensure that the panels themselves are not impacted by flood water. The fact that the run off from the panels would be concentrated to the bottom edge of the panels suggests that there would be an impact on permeability below these strips – Has any study been provided as to the potential impact of this aspect? Paragraph 2.3.21 provides for wide mesh fencing to be used in Flood Zone 3 areas which would include D14. The fields	principal areas of fluvial interaction with the Scheme. The Lime Down D Natural Flood Management Viability Report [REP5-109] extends that assessment downstream through Corston and considers peak flows, flood depths and the influence of the A429 crossing. This provides further evidence that the existing flood mechanism at Corston is governed principally by the wider Gauze Brook catchment and the local conveyance constraint at the A429, rather than runoff generated within Lime Down D. The NFM assessment also demonstrates that Lime Down D

Reference	Applicant's resume of original comment	Applicant's Response to Oral Submission	Comment to Response	Applicant's Response
		flooding at the A429 bridge more severe.	downstream of D14 are fenced with conventional sheep netting against which there is a substantial build up of debris every time Gauze Brook floods; causing water to back up further. A mesh size larger than sheep netting would impact the applicant's ability to exclude deer etc from the site.	represents less than 8% of the approximately 26.3 km² catchment draining to Corston and that even substantial theoretical additional storage within Lime Down D would not materially alter downstream flood conditions. This further supports the conclusions of the FRA that the Scheme will not materially increase flood risk downstream. The reference to Solar PV Panel freeboard is 600 mm, not 600 m. The potential for local rainfall concentration at panel edges and associated effects on soil condition and runoff is addressed in FHW2.9. Local redistribution of rainfall beneath panel edges does not equate to an

Reference	Applicant's resume of original comment	Applicant's Response to Oral Submission	Comment to Response	Applicant's Response
				increase in catchment runoff. The relevant controls are focused on maintaining soil structure and vegetation and preventing erosion, channelisation and hydraulically connected flow paths. In relation to fencing, the ES Volume 3 Appendix 11-6 Flood Risk Assessment and Outline Drainage Strategy Lime Down D [REP5-055] requires fencing within Flood Zones 2 and 3 to use the widest mesh aperture available within the selected fencing system so as to maximise the passage of floodwater and debris while still meeting the operational

Reference	Applicant's resume of original comment	Applicant's Response to Oral Submission	Comment to Response	Applicant's Response
				requirements of the Scheme. The Applicant therefore does not agree that the Scheme would materially increase flood risk at Corston or prejudice potential future flood alleviation measures.
GP-002	There are on average 20 to 30 groups passing by the garden daily and perhaps 100 on a summer's weekend, with families, dog walkers, cyclists, hikers and horse riders. The footpath is set to close, eroding the main benefit of MALW 51 and cutting off 45-minute circular routes to Mill Lane	MALW 51 will remain open throughout the lifetime of the Scheme and will connect to HULL7 to the west. Maintenance of the PRow surface, furniture and waymarking within land under freehold acquisition by the Applicant is their responsibility to maintain, and is secured through the Outline Public Rights of Way and Permissive Paths Management Plan	The Applicant has taken the comment re footpaths out of context. It was acknowledged that MALW51 will remain open throughout albeit enjoyment of it will be decreased. MALW51 is relatively short but it is important, its main benefit being that it leads into HULL7 and HULL6 to provide circular routes back to Corston. It would appear that both HULL7 and HULL6 will be subject to	The Applicant seeks to confirm that both HULL6 and HULL7 (and indeed all PRowS within the Order Limits) are to remain open throughout the operational lifetime of the Scheme. Short-term temporary closures would only be required where construction work being undertaken cannot be physically separated from PRow users (such as cable trenching that crosses PRowS). In these

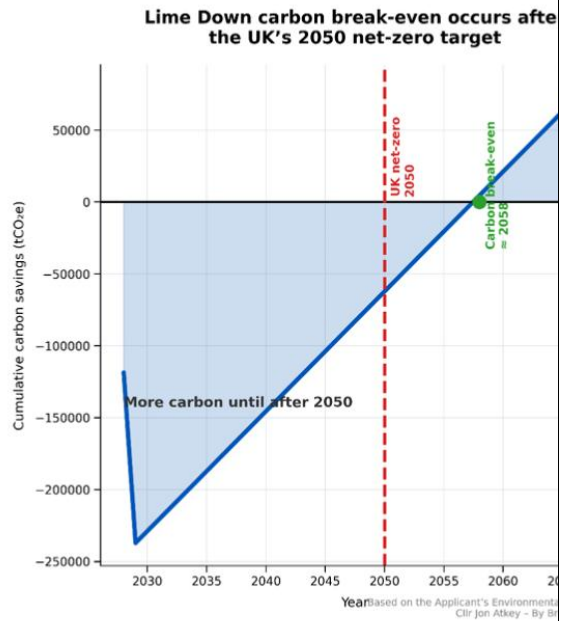
Reference	Applicant's resume of original comment	Applicant's Response to Oral Submission	Comment to Response	Applicant's Response
		[REP1-104] by Requirement 16 in Schedule 2 to the Draft DCO [REP3-005].	closure removing the prime benefit of MALW51.	cases, closures are to be kept to a minimum as secured through the Outline Public Rights of Way and Permissive Paths Management Plan [REP1-104] by Requirement 16 in Schedule 2 to the Draft DCO [REP5-012]. The Applicant acknowledges that there may be some adverse effect on enjoyment or desirability of these routes as a result of the presence of the Scheme. This has been assessed in ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241], which finds no residual significant adverse effects to these routes, subject to

Reference	Applicant's resume of original comment	Applicant's Response to Oral Submission	Comment to Response	Applicant's Response
				implementation of mitigation.

6.3 Cllr Jon Atkey

Table 6-3 Cllr Jon Atkey: Comments on any submissions received at Deadline 4

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
JA-001	Description and DCO Process	Introduction	I have reviewed the Applicant's Climate Response (EXAM/9.33). This appears to be the response promised in EXAM/9.23 to points CJA-001, CJA-002 and CJA-006, which arose from my written submission on the Applicant's response to RR0914.	The Applicant notes this comment.
JA-002	Climate Change and Energy Need	Carbon Break-Even	Carbon Break-Even The Applicant now addresses my carbon break-even point. However, I do not consider that it shows my conclusion to be wrong. The Applicant summarises my position as being that, using the Applicant's own figures, carbon break-even is not reached until around 2058, meaning the Scheme remains a net contributor to atmospheric carbon beyond the UK's 2050 net-zero target.	The Applicant notes this comment. The Applicant has updated the ES Volume 1, Chapter 7: Climate Change [REP5-022] submitted at Deadline 5 which contains updated calculations as further detail has become available. The Applicant notes that there is no requirement for the Scheme's construction and operational emissions to be "paid off" before 2050. A carbon break-even date beyond 2050 does not therefore mean that the Scheme is inconsistent with the UK's net zero target, which applies to emissions across the economy as a whole rather than individual developments.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
JA-003	Climate Change and Energy Need	Carbon Break-Even	The infographic below illustrates the timing of carbon break-even using the Applicant's own figures.  Lime Down carbon break-even occurs after the UK's 2050 net-zero target	It is noted that the graph indicates that cumulative carbon savings would exceed the Scheme's lifecycle GHG emissions after 2050. However, the methodology and assumptions used to derive the cumulative carbon savings presented in the graph are not provided and the calculation cannot therefore be verified. In any event, a carbon payback date before 2050 is not an established requirement or significance threshold within the relevant GHG assessment guidance, and a payback date beyond 2050 does not, in itself, demonstrate that the Scheme is inconsistent with the UK's net zero target.
JA-004	Climate Change and Energy Need	Carbon Break-Even	The Applicant does not provide an alternative break-even date, identify an error in the calculation, or show that break-even is achieved before 2050. Instead, it argues that carbon payback is not an appropriate measure of significance.	The Applicant has updated the ES Volume 1, Chapter 7: Climate Change [REP5-022] submitted at Deadline 5 which contains updated calculations as further detail has become available.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			That is a different argument. The Applicant may be correct that carbon payback should not be the sole measure of significance. However, it does not follow that it is irrelevant. The timing of emissions and benefits is plainly relevant to the planning balance. A scheme whose benefits depend on many decades of future operation cannot automatically be treated in the same way as a scheme whose benefits arise much earlier.	The Applicant does not suggest that the timing of emissions and benefits is irrelevant. However, carbon payback is not an established test for determining the significance of GHG emissions or compatibility with the UK's net zero target. The significance assessment has therefore been undertaken in accordance with the relevant guidance, taking account of the Scheme's emissions, mitigation and the wider transition to net zero. The fact that a calculated carbon break-even point may occur after 2050 does not, in itself, demonstrate that the Scheme is inconsistent with the UK's net zero target.
JA-005	Climate Change and Energy Need	Other Assessments	Other Assessments It is also noteworthy that other reviewers of the Applicant's climate assessment have estimated even later carbon payback periods. The University of Derby and the review commissioned by Wiltshire Council are summarised by the Applicant as suggesting breakeven dates between	The applicant notes this comment and refers to its response to JA-004.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			approximately 2062 and 2079, depending on the methodology used. The Applicant does not seek to demonstrate that those conclusions are wrong either. Rather, it argues that carbon payback is not an appropriate metric. The issue in dispute is therefore not the timing of break-even, but the weight that should be attached to it.	
JA-006	Climate Change and Energy Need	Timing of Benefits	Timing of Benefits It is reasonable for the Examining Authority to consider how much weight should be given to climate benefits that depend on decades of future operation, particularly when many of the Scheme's adverse effects would arise immediately.	The applicant notes this comment and refers to its response to JA-004.
JA-007	Climate Change and Energy Need	Timing of Benefits	This is reinforced by the Applicant's own sensitivity testing, which shows that reducing the operational life of the Scheme from 60 years to 40 years reduces the claimed net greenhouse gas benefit from 253,839 tCO₂e to just 14,256 tCO₂e. This demonstrates how dependent the	The applicant notes this comment and refers to its response to JA-004. The Applicant has updated the ES Volume 1, Chapter 7: Climate Change [REP5-022] submitted at Deadline 5 which contains updated calculations as further detail has become available.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			claimed climate benefit is on very long-term assumptions.	The benefit of the Scheme over the 60-year lifetime is estimated to be between 65,916 tCO ₂ e and 266,507 tCO ₂ e - dependent upon the final design layout of the Scheme.
JA-008	Climate Change and Energy Need	The Wider Issue	The Wider Issue While EXAM/9.33 responds to the carbon break-even aspects of CJA-001, CJA-002 and CJA006, it does not address the wider point behind those submissions. Carbon accounting has never been my principal concern. It is that the Examination has been presented with a series of separate technical responses to individual impacts, without a convincing assessment of whether their cumulative effect results in an acceptable planning balance. The Applicant has responded to individual issues, including carbon break-even. The broader concern about the accumulation of harm and the overall planning balance remains insufficiently addressed.	It is not correct to state that the Examination has been presented with a series of separate technical responses to individual impacts. Cumulative assessment is a key consideration throughout the application. Full and extensive engagement, assessment and reporting of intra- and inter-project cumulative effects has been undertaken for each technical discipline (including climate) [APP-059 - APP 072] with a consolidated summary set out within ES Chapter 21: In Combination and Cumulative Effects [APP-073]. With implementation of the secured management and mitigation measures, effect interactions do not increase the significance of effects identified in the Environmental Statement. The Applicant has responded to comments relating to cumulative effects in further detail in on page 806-807 and

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				page 870-871 of the Applicant's Response to Relevant Representations [PDA-009], where further sign-posting is provided, and within pages 97-99 of the Applicant's Response to Second Written Questions [REP5-097] where supporting information in relation to a proposed mixed use scheme west of Chippenham (L/2026/03545) is set out. Planning balance has been applied as set out in section 9 of the Planning Statement [REP3-081], which considers the positive, neutral and negative impacts of the Scheme and weighs them up to conclude that there are no adverse impacts of sufficient weight, either along or collectively, that would mean the development consent order should not be made. It is considered that the adverse impacts identified in relation to the Scheme are clearly outweighed by the substantial public benefits that would arise from the provision of low carbon energy to meet the need identified in NPS EN-1.
JA-009	Cumulative and In-	Planning Balance	More broadly, my principal concern remains planning balance.	Please refer to the Applicant's response to JA-008 above. In particular, refer to

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
	Combination Effects		Throughout the examination, the Applicant has addressed landscape, heritage, agriculture, ecology, transport and climate change as separate topics. The question for the Examining Authority is whether their combined effect is acceptable in this location. My concern, as set out in earlier submissions, is the accumulation of harm. Individual impacts may be capable of mitigation or justification when considered separately, but the planning judgement must consider their cumulative effect. The issue is not whether each impact can be justified in isolation. It is whether the overall result represents an acceptable outcome for this rural landscape and its communities. The Applicant has provided responses on individual topics. What remains largely unaddressed is the cumulative planning balance.	the Intra Project Assessment [APP-073] whereby all overlapping effects across all technical disciplines are considered to determine where effects in one discipline (such as glint and glare) together with effects from another discipline (such as noise) could combine to generate a significant effect. The In Combination Effects Matrix [APP-264] sets out all receptors and technical disciplines considered. With implementation of the secured management and mitigation measures, effect interactions do not increase the significance of effects identified in the ES.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
JA-010	Description and DCO Process	Conclusion	The central question for the Examination remains the same as that raised in my oral submission: When the full scale of harm is weighed against what this scheme actually delivers, is it worth it in this place? The Applicant has not yet demonstrated that the benefits of the Scheme outweigh the accumulation of harms identified throughout this examination.	Please refer to the Applicant's response to JA-009 above.

6.4 Grittleton, Sevington & Leigh Delamere Village Hall and Recreation Ground

Table 6-4 Grittleton, Sevington & Leigh Delamere Village Hall and Recreation Ground

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
GVH-001	Socio-Economics, Tourism and Recreation	EXQ2 SE2.3 - Compensation for Community Facilities	<i>SE2.3 Compensation for Community Facilities</i> <i>All Parties:</i> <i>The SoCG with Wiltshire Council, section 3.12.11, suggests a business compensation scheme [REP4-061]. Aside from the compensation to businesses there have been concerns raised by operators of community facilities that the proposal will result in their closure resulting from a lack of bookings during the construction, maintenance and decommissioning phases. Examples include [RR-2749], [RR-4315], [RR-4617]. All parties are asked to consider if they would be agreeable to a community facility compensation fund that would ensure they remain open and functional during the aforementioned phases and available for community use despite any negative effects of the proposed development.</i>	The Applicant refers to its response to question SE2.3 in The Applicant's Response to the Examining Authority's Second Written Questions [REP5-097]. This considers that as no significant effects to community or recreational facilities are identified in the Environmental Statement. Furthermore, the Applicant has sought to ensure impacts to community facilities are mitigated through the measures already set out through the management plan secured by each of the relevant requirements in Schedule 2 to the Draft DCO [REP5-012]. Therefore, the Applicant maintains that a financial compensation mechanism for community facilities is not necessary.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			<i>The applicant should note that simple reference to the Community Benefit Fund is not considered an appropriate response.</i> Previously I have highlighted the financial difficulties the creation of Lime Down Solar Farm and more specifically the corridor and compound construction/decommissioning could cause the Village Hall and I am pleased to see the Executive push for more details regarding " a community facility compensation fund".	
GVH-002	Socio-Economics, Tourism and Recreation	EXQ2 SE2.3 - Compensation for Community Facilities	As an independent Charity, owning its own land and facilities, I would like to register our trepidation if the proposed fund were to be solely in the hands of the Local Authority e.g. held under a S106 Agreement.	The Applicant refers to its response to GVH-001 above.
GVH-003	Socio-Economics, Tourism and Recreation	EXQ2 SE2.3 - Compensation for Community Facilities	It is reassuring to note that the Executive is asking Wiltshire Council to provide details of how such a fund would work, administration, eligibility, etc and I look forward to reading these details in due course. Thank you for pursuing this matter.	The Applicant notes this comment and refers to its response to GVH-001.

6.5 Joan Marie Bassler

Table 6-5 Joan Marie Bassler: Responses to Examining Authority's Second Written Questions

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
JMB-001	Landscape and Visual	Management of Landscape Impact	<i>DCO2.1 Residual Issues with dDCO and management plans</i> <i>2) Outline any remaining or residual issues that you have with any of the management plans/ documents listed below, set out why the applicant has not yet resolved your concerns or why you are not content with the applicant's justification, and define what remedy or solutions or amendments you are seeking to address your concerns within the drafting of the relevant management plan(s)/ document(s).</i> I appreciate the opportunity to comment. While revisions may improve detail, they cannot mitigate the scale, duration, or character of harm. The plans treat irreversible landscape transformation as manageable, which I reject.	The Applicant notes this comment.
JMB-002	Description and DCO Process	Management Plans	All management plans listed remain unacceptable because they	The Applicant notes the Interested Party's objection to the principle of the Scheme. The inclusion and

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			presuppose consent for a development that should not occur.	development of management plans does not presuppose that development consent will be granted. Rather, the management plans form part of the suite of documents submitted with the DCO Application and establish the measures and controls that would apply in the event that development consent is granted. The management plans enable the likely environmental effects of the Scheme, and the mitigation measures relied upon to avoid, reduce or manage those effects, to be clearly identified and appropriately secured. Whether development consent should be granted is a matter for the Secretary of State, having regard to the DCO Application, the Environmental Statement, the findings of the Examination and all other relevant considerations. The preparation and submission of the management plans does not prejudice that determination.
JMB-003	Climate Change and Energy Need	Energy Independence	Destroying our countryside in this way, under the banner of slowing global warming and achieving energy self-sufficiency, is wrong-headed. We	It is the government's policy to ensure that <i>"our supply of energy always remains secure, reliable, affordable, and consistent with meeting our target to cut</i>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			are not building true independence; we are merely replacing our reliance on foreign energy with a reliance on foreign components. Instead of importing oil, we are importing foreign solar panels. This approach exports our carbon footprint and undermines the opportunity to develop home-grown industries.	<i>GHG emissions to net zero by 2050"</i> (NPS EN-1 (2023) paragraph 2.3.3). Solar is a key part of the government's strategy for low-cost decarbonisation of the energy sector (NPS EN-3 (2023) paragraph 2.10.9). The Statement of Need [REP1-085] explains why the Scheme is urgently needed at the scale proposed; why the proposed location is appropriate for the Scheme; and how the Scheme addresses all relevant aspects of established and emerging government energy and climate change policy and commitments. By developing new low-carbon generation facilities, clean, secure and affordable electricity supplies will be available to help develop home-grown industries, strengthen domestic manufacturing and skilled employment without the dangerous carbon dioxide emissions and volatile pricing associated with relying on carbon intensive supplies of energy.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Further, the Scheme's GHG assessment adopts conservative assumptions regarding the manufacture and transportation of key components, including assuming that products will be manufactured in China and transported to the UK. If products are instead sourced from the UK or Europe, associated transport and embodied carbon emissions would be lower, increasing the overall GHG benefit of the Scheme.
JMB-004	Climate Change and Energy Need Site Selection and Alternatives	Domestic Production	Britain should be producing its own components — such as steel for geothermal and wind power — and investing in technologies that strengthen domestic manufacturing and skilled employment rather than sacrificing agricultural landscapes to imported infrastructure.	The Applicant notes this comment. The Clean Power 2030 Action Plan established challenging capacity ranges for all forms of established large-scale, established low-carbon generation technologies. Table 1 of the Statement of Need [REP1-085] has more information. It is the government's policy that all such forms of electricity generation are needed, however paragraph 3.3.20 of NPS EN-1 (2023) explains that the government's "<i>analysis shows that a secure, reliable, affordable, net zero consistent system in 2050 is likely to be</i>

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				<i>composed predominantly of wind and solar."</i> The Applicant also refers to its response to Reference JMB-003 above. The Scheme is likely to produce approximately 268 full time equivalent jobs during construction in skilled trades including civil engineering, electrical engineering, and supporting industries. During its operational phase, the Scheme is anticipated to employ up to 15 full time equivalent jobs across a mix of engineering, maintenance, and land management roles. The Scheme furthermore aims to wherever practicable support employment, both directly on the Scheme and indirectly through its supply and value chains, and local skills uplifting and training through the measures set out in the Outline Skills, Supply Chain and Employment Plan [REP3-104]. This is secured by Requirement 18 of Schedule 2 to the Draft DCO [REP5-012].
JMB-005	Landscape and Visual	Management Plans	I remain opposed to the Lime Down Solar Park proposal in its entirety. My concerns are fundamental and cannot	ES Volume 1, Chapter 12: Cultural Heritage [REP3-017] , supported by ES Volume 3, Appendices 12-1 to 12-8

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			be resolved through amendments to the draft Development Consent Order (dDCO) or any associated management plans. Because I oppose the granting of development consent, all articles, requirements, and schedules of the dDCO remain objectionable. The applicant's revisions do not address the core harm: the industrialisation of open countryside, the loss of rural character, and the long-term damage to landscape and heritage settings. No redrafting could make the proposal acceptable.	[APP-219 to APP-232] has assessed the potential impact of the scheme on heritage assets. Where required appropriate mitigation is proposed. See Section 12.9 of ES Volume 1, Chapter 12: Cultural Heritage [REP3-017] for embedded mitigation and Section 12.11 for additional mitigation. No significant residual effect were identified. (see Section 12.12 of ES Volume 1 Chapter 12: Cultural Heritage [REP3-017]) The LVIA set out in ES Volume 1, Chapter 8: Landscape and Visual [REP3-025] has been undertaken with consideration of the appropriate and relevant guidance and robustly assesses both the landscape and visual effects of the Scheme independently to ensure both the impacts and effects on the fabric and character of the landscape are taken into account as well as the views and visibility. The LVIA set out in acknowledges that as a consequence of the Development, there would be significant adverse effects to Landscape Character and visual amenity. However, NPS EN-1

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				recognises at para 5.10.5 that "Virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape, but there may also be beneficial landscape character impacts arising from mitigation." and at Para 5.10.13 that "All proposed energy infrastructure is likely to have visual effects for many receptors around proposed sites".
JMB-006	Description and DCO Process	Development Consent	I remain opposed to the Lime Down Solar Park proposal in its entirety. My concerns are fundamental and cannot be resolved through amendments to the draft Development Consent Order (dDCO) or any associated management plans. The only remedy that addresses my concerns is refusal of development consent. The Examining Authority should recommend that the Secretary of State decline the application.	The Applicant notes this comment.
JMB-007	Description and DCO Process	Use of AI	Note regarding use of AI – This response was drafted with assistance from Microsoft Copilot, an AI companion that helped structure and refine the wording for clarity, tone, and procedural accuracy. All	The Applicant notes the use of AI.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			substantive views, reasoning, and conclusions expressed are my own. Thank you for your time and consideration. -- Joan Bassler (Malmesbury)	

6.6 January Farrington

Table 6-6: January Farrington: Comments on any submissions received at Deadline 4

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
JF-001	Socio-Economics, Tourism and Recreation	Equine Assessment	Observations following the Applicant's Deadline 4 Responses and the Reliability of the Applicant's Assessment. This submission should be read alongside my Relevant Representation, Written Representation, oral submissions, Deadline 3 response and Deadline 4 submission concerning the equestrian setting of the Scheme. I wish to comment on what the Examination itself has revealed. A consistent pattern has emerged whereby important receptors and impacts were either incorrectly characterised, excluded from assessment or only investigated after they were raised by Interested Parties and the Examining Authority. The Applicant's conclusions were often reached before it had properly understood the places, businesses and practical realities it was assessing.	The assessment of equestrian facilities undertaken in ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241], identified and assessed equestrian facilities based on the Scheme's likely impacts to paddocks and stables where horses were assumed to be kept, and the impacts to horses and riders on the surrounding PRow and highway network. Therein, riding schools, events centres, and equine businesses were assessed as being medium sensitivity receptors, rather than low sensitivity receptors, as private facilities were. The assessment identified no significant adverse effects to equine facilities (with the exception of Park Farm, Yatton Keynell during construction) at any phase of the Scheme, based on the assessment parameters set out. During the examination, the Applicant has ensured it has responded to all representations made by equine businesses to ensure that the mitigation

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				measures set out for construction, PRoWs, HGV movements, and during operation are suitable and respond to additional concerns being raised. The Applicant has sought to engage with some of these stakeholders specifically (such as Ms Farrington) through direct engagement where appropriate. Whilst the Applicant had considered its pre-application assessments satisfactory to understand the likely effects on equine businesses, and how mitigation should be applied, the Applicant has nonetheless provided an Equine Business Report [REP5-105] to the examination upon request by the Examining Authority to directly respond in more detail to matters of equine health and economic impacts to individual businesses.
JF-002	Socio-Economics, Tourism and Recreation	The Applicant's assessment of West Park Farm	The Applicant's assessment of West Park Farm Throughout the Examination I have consistently questioned how West Park Farm had been assessed.	West Park Farm was assessed as an equestrian facility in ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241]. The assessment identified West Park Farm as an equine business and therefore assigned it a medium sensitivity to changes. Impacts on West

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			The Applicant repeatedly relied upon that assessment in responding to my submissions and maintained that West Park Farm had been specifically assessed and that no significant residual effects on its operation were anticipated. It later accepted that the business operations themselves had not been assessed because individual business performance fell outside the scope of its assessment. Those two positions are difficult to reconcile.	Park Farm were considered in respect of proximity and views of the Solar PV array areas, construction noise and personnel movement within ~50 m of paddock areas where horses were observed to be kept. HGV movements on the surrounding road network and impacts on bridleways and byways were considered in respect of the likelihood that users from West Park Farm would use them and the availability of alternative routes (such as into King's Heath). Consideration of how construction mitigation (as secured through the Outline CEMP [REP5-071], the Outline CTMP [REP5-083] and the Outline Public Rights of Way and Permissive Paths Management Plan [REP1-104] by Requirements 13, 15 and 16 of Schedule 2 to the Draft DCO [REP5-012]) would be applied were used to determine the likely significance of effect to West Park Farm. No significant adverse effects were anticipated and therefore no specific assessment of the economic effect on West Park Farm as an individual business was considered proportionate.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				The assessment outcomes were reaffirmed in the Equine Business Report [REP5-105] which identified that with the secured mitigation measures, no significant impact on employment or income at West Park Farm was considered likely to occur.
JF-003	Socio-Economics, Tourism and Recreation	The Applicant's assessment of West Park Farm	Following my request for clarification, it became clear that the assessment had been based largely on external observations and an online search, which failed to identify the true nature of our business.	For the scope and level of detail in the assessment of West Park Farm in ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241] the determination of the receptor as a business was a greater factor than the business' operations in determining its sensitivity as a receptor.
JF-004	Socio-Economics, Tourism and Recreation	The Applicant's assessment of West Park Farm	This is significant not because a mistake was made, but because it occurred despite more than two years of consultation. During 2024 and 2025, Dermot and I engaged directly and at length with the project team, both in writing and in person, including a meeting at Bradfield manor with Will Threlfall and three other members of the Applicant's team. During the same period, two Racing Post articles were published, and I understand the Applicant visited Ladyswood Stud. The nature of the	The Applicant used feedback received from pre-application consultation to identify the facilities at West Park Farm for the assessment team. Whilst the Applicant acknowledges the meeting cited, of which members of the Applicant's team and the respondent were present, the purpose of that meeting was to discuss concerns regarding Bradfield Manor which expanded into wider project matters, though concerns around equine businesses or specific locations were not meaningfully discussed.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			equine businesses within this landscape, including West Park Farm, was therefore communicated clearly throughout the consultation process. The Applicant therefore had repeated opportunities to understand West Park Farm that extended far beyond an online search.	The Applicant further acknowledges that the owners of West Park Farm attended public consultation events at Hullavington and Luckington in February 2025, where concerns regarding a stud farm/business were raised, however the specific location of the Stud was not. Nevertheless, the Applicant acknowledges that the misidentification mentioned was in ES Volume 3, Appendix 16-2: Tourism and Recreation Receptor Tables [APP-241] where West Park Farm is listed as a livery instead of a stud farm. This however did not affect how the receptor was assessed. The assessment outcomes were reaffirmed in the Equine Business Report [REP5-105] which identified that with the secured mitigation measures, no significant impact on employment or income at West Park Farm, or to any other equine business in the Study Area was considered likely to occur.
JF-005	Socio-Economics,	The Applicant's assessment	For me, this raises a much wider question. If a specialist business immediately adjacent to the Scheme	The Applicant is confident that the assessment of economic effects in ES Volume 1, Chapter 16: Socio-

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
	Tourism and Recreation	of West Park Farm	was not properly understood despite extensive engagement, what confidence can be placed in the wider assessment of businesses and receptors throughout the Scheme? The same concern extends beyond West Park Farm. I remain unconvinced that businesses such as Whatley Manor have been understood sufficiently for the Applicant's socioeconomic conclusions to command confidence.	Economics, Tourism and Recreation [APP-068] is robust, and the assessment outcomes are supported by the later examination submissions made by the Applicant in the form of the Equine Business Report [REP5-105] and the Technical Note on Impacts to Non-Equine Businesses [REP5-111].
JF-006	Socio-Economics, Tourism and Recreation	Assessments	The Examination has identified further gaps The Examination has also demonstrated that important information has continued to be sought well after submission of the DCO application. Examples include: The late equine business questionnaire • Further consideration of equine receptors	The Applicant is confident that the assessment of economic effects in ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068] is robust and proportionate in detail to the information required for a decision to be made on the merits of the Scheme, and the efficacy of the mitigation measures proposed. The assessment outcomes are supported by the later examination submissions made by the Applicant in the form of the Equine Business Report [REP5-105] and the Technical Note on Impacts to Non-Equine Businesses [REP5-111]. These reports have provided

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			- Continuing requests for clarification regarding rural roads and vulnerable users - Additional flood survey work - Further information requested by the Examining Authority on socio-economic effects I welcome the Applicant undertaking further work however, I remain concerned that much of this work appears to be filling gaps in the original assessment rather than simply refining an already robust evidence base.	supplementary information at a greater level of detail than the ES chapter assessment, rather than assessing substantively new matters.
JF-007	Transport and Access	Rural roads	The July hearings reinforced many of the concerns previously raised by local residents. The ExA questioned the Applicant's assumptions regarding rural road use, horse riders and other vulnerable users and continued to seek further clarification regarding usable road widths and passing arrangements.	The Applicant considers the information provided on assumptions for rural road users was of a proportionate detail for the geographic scale of the Scheme, the type of impacts anticipated, the prevalence of non-motorised users, and the level of detail the Scheme is required to provide for DCO decision (i.e. detail design is not until after DCO consent is made). As such, the information sought by the ExA was considered supplementary information at a greater level of detail than the

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Environmental Statement, rather than assessing substantively new matters.
JF-008	Transport and Access	Rural roads	These discussions reflected the reality experienced daily by those living and working here. Our local roads are not simply routes between villages. They are an essential part of the area's farming, equestrian and recreational infrastructure.	The Applicant understands that the rural road network is used for more than just access and has sought to ensure that narrative is integrated into the assessment of effects on the local economy and recreational infrastructure network, as assessed in ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068] , and in its contributions to quality of life in Chapter 18: Human Health [APP-070] . The assessment outcomes however are that the use and experience of the rural road network is not anticipated to be significantly changed by the Scheme, and therefore no significant effects on economy or health and wellbeing are anticipated as a result.
JF-009	Transport and Access	Rural roads	The issue is not simply whether construction vehicles can physically use these roads. It is whether they can safely coexist with the farming, equestrian and recreational activities that already depend upon them every day.	The Applicant understands that the rural road network is used for more than just access and has sought to ensure that narrative is integrated into the assessment of effects on the local economy and recreational infrastructure network, as assessed in ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [APP-068] ,

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				and in its contributions to quality of life in Chapter 18: Human Health [APP-070]. The assessment outcomes however are that the use and experience of the rural road network is not anticipated to be significantly changed by the Scheme, and therefore no significant effects on economy or health and wellbeing are anticipated as a result.
JF-010	Transport and Access	Rural roads	I also remain concerned about the reliability of the Applicant's NMU surveys. Further surveys have again been undertaken over a relatively short period during the school holidays and exceptionally hot weather, when use of local roads and PRoW would not necessarily be representative of normal conditions. In addition, the location of some recent survey cameras appeared unlikely to capture the full extent of movement along certain routes. I respectfully ask the Examining Authority to exercise caution when placing significant weight on short duration surveys when there is substantial local evidence	The NMU surveys were recently undertaken 28th to 3rd August and the results of these are presented in Highways Technical Note – Non-Motorised User Surveys [EN010168/EXAM/9.70] submitted at Deadline 6. School holidays allow for more leisure trips and recreational trips. Whilst the weather was warm there was no amber health warnings during the period surveyed.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			demonstrating more extensive everyday use.	
JF-011	Cumulative and In-Combination Effects	Cumulative Development	I also remain concerned that Lime Down continues to be considered largely in isolation. Other consented or proposed solar development, including Five Lanes Solar, Red Barn Solar and Leigh Delamere Solar, have the potential to place additional pressure on the same communities and transport network. The practical cumulative effects are not limited to landscape and visual impact. They include overlapping construction programmes, shared road use, increased HGV movements and the progressive industrialisation of what is currently a predominantly rural landscape.	Interaction and the potential for effects in combination with other consented or reasonably foreseeable projects is a key consideration and has been carefully considered and reported as part of the cumulative assessment work set out within each individual technical ES Chapter [APP-059 to APP-072] with a consolidated summary provided within ES Chapter 21 Cumulative and In-Combination Effects [APP-073] . The long-list of projects considered comprises 358 schemes (listed in [APP-264]) with the short-list of schemes being 41 projects as listed in Table 21-4 of [APP-073] . Five Lanes (ID 218), Red Barn (ID 243) and Leigh Delamere (ID 221) solar schemes are all taken into account, alongside a number of other solar, BESS and mixed use proposals. The assessment presented in ES Chapter 21 [APP-073] identifies that, taking a conservative worse case approach, significant cumulative effects with the short list of developments are identified at a limited and discrete number of receptors

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				comprising tourism and recreation impacts during the construction phase on Corsham Park, PRoW WT CORM 122, PRoW WT HULL 29, and Sustrans Cycle Route 403, and on skylark at a District level.
JF-012	Consultation and Engagement	Consultation	At the beginning of the Examination, Stop Lime Down submitted concerns regarding the adequacy of the Applicant's consultation. Having followed the examination closely, I believe many of those concerns have subsequently proved to be well founded and do not understand why these concerns were dismissed so easily. Consultation is only meaningful if the information gathered is used to inform the assessment. The experience of West Park Farm alone suggests that this did not happen.	The consultation undertaken for the Scheme, the feedback received and the way in which that feedback was considered in developing the DCO application are set out in the Consultation Report [APP-022] and its accompanying appendices. The Scheme evolved through an iterative process informed by environmental assessment, technical studies, stakeholder engagement and feedback received during non-statutory, statutory and targeted consultation. The Planning Inspectorate also considered the Applicant's consultation as part of its decision on whether to accept the DCO application for Examination. Its Section 55 Checklist [PD-001] records that the Applicant had demonstrated how it had regard to relevant responses received during the statutory and targeted consultation.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				In addition, relevant local authorities, including Wiltshire Council [AoC-003], Gloucestershire County Council [AoC-009] and Vale of White Horse District Council [AoC-010], confirmed through their Adequacy of Consultation Representations that the Applicant had complied with the relevant statutory consultation requirements. The specific matters raised regarding the assessment of West Park Farm are addressed in the Applicant's responses to JF-002 to JF-005 above.
JF-013	Description and DCO Process	Cumulative experience of this Examination	Confidence in the Applicant's assurances has inevitably been affected by the cumulative experience of this Examination. The incorrect assessment of West Park Farm, the need for further questionnaires and assessment work during the Examination, unauthorised survey access to our land, and the continuing reliance on information and mitigation to be provided at later stages have, taken together, made it increasingly difficult to place confidence in assurances that	The Applicant notes the Interested Party's comments but does not agree that the matters identified provide a basis for reducing the weight to be afforded to the Applicant's evidence. The Examination process provides an opportunity for the Examining Authority, Interested Parties and statutory bodies to scrutinise the DCO Application, seek clarification and request further information where appropriate. The provision of additional information, clarification or assessment during the Examination is therefore not, in itself,

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			outstanding matters can simply be resolved after consent. I respectfully ask the Examining Authority to take this wider context into account when considering the weight to be attached to the Applicant's evidence.	indicative of deficiencies in the Applicant's evidence or an inappropriate reliance on matters being deferred until after consent. In relation to West Park Farm, the Applicant has acknowledged and responded to the matters raised. Similarly, the use of questionnaires and other supplementary assessment work during the Examination has enabled the Applicant to respond to additional information and concerns raised by Interested Parties and to ensure that the Examining Authority has the information necessary to reach its conclusions. The Applicant does not agree with the suggestion that there is a continuing reliance on unresolved information or mitigation simply being deferred until after consent. Where details are appropriately developed at the detailed design or pre-construction stage, the DCO provides mechanisms through its Requirements and associated control documents to secure the relevant parameters, mitigation and management measures. This is distinct from leaving

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				material environmental effects or necessary mitigation unresolved. The Applicant considers that the Environmental Statement, subsequent Examination submissions and secured mitigation provide a robust evidential basis upon which the effects of the Scheme can be considered. The Applicant has continued to engage constructively with the Examining Authority, statutory bodies and Interested Parties throughout the Examination and has provided further information and clarification where requested. The weight to be attached to that evidence is ultimately a matter for the Examining Authority, having regard to the totality of the information before it.
JF-014	Description and DCO Process	Concluding observations	Throughout this Examination I have tried to provide factual, site-specific evidence based upon my own experience and the operation of West Park Farm. I appreciate the additional work undertaken by the Applicant during the examination. Nevertheless, I remain concerned that many important matters have only been	The Applicant refers to its response to JF-014 and JF-016.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			revisited after they were raised by IPs or by the Examining Authority.	
JF-015		Concluding observations	For me, the issue is not simply whether I agree with individual conclusions, it's whether those conclusions were reached using a sufficiently accurate understanding of the receiving environment. I do not believe the applicant has a sufficiently accurate understanding of the receiving environment to reach the conclusions set out in their Environmental Statement. The events of this Examination suggest that, in several important respects, it does not. I respectfully ask the Examining Authority to bear that in mind when considering the weight to be attached to the Applicant's evidence and the conclusions drawn from it.	The Applicant does not agree that it lacks a sufficiently accurate understanding of the receiving environment to support the assessments and conclusions presented in the Environmental Statement. The environmental assessments have been informed by a comprehensive programme of desk-based review, site surveys, data collection and consultation, undertaken by appropriately qualified specialists and reported within the Environmental Statement and its supporting appendices. The level of baseline information obtained has been proportionate to the nature and scale of the Scheme and sufficient to identify relevant environmental receptors, assess likely significant effects and identify appropriate mitigation. The Applicant acknowledges that additional information and clarification have been provided during the

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				Examination in response to matters raised by the Examining Authority and Interested Parties. However, the provision of such information does not demonstrate that the receiving environment was inadequately understood when the Environmental Statement was prepared. The Examination is an iterative process in which the evidence supporting an application is scrutinised and, where appropriate, clarified, supplemented or updated in response to questions and representations. Where new or more detailed information has become available during the Examination, the Applicant has considered that information and, where necessary, reviewed the relevant assessment conclusions and mitigation. The Applicant has not identified any matter arising through this process that undermines the overall adequacy of the environmental baseline or prevents the Examining Authority from reaching a reasoned conclusion on the likely significant environmental effects of the Scheme.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				The Applicant therefore considers that the Environmental Statement, together with the additional information and clarification provided during the Examination, provides an appropriate and robust evidence base for the determination of the Application. The weight to be attached to that evidence is ultimately a matter for the Examining Authority.

6.7 Helen Hood

Table 6-7 Helen Hood: Additional Submissions – Accepted at the discretion of the ExA

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
HH-001	Arboriculture	Private Property Tree Tag	I am writing to you after yesterday discovering a metal tag with the serial number 0839 stapled to an oak tree in our garden. I have spoken to Wiltshire Council this afternoon, who have confirmed that this does not belong to them, nor are they currently carrying out any work in Rodbourne or the surrounding area. Therefore a third party has without any notice to us, discussion or permission by us has trespassed on our property and attached this without consent. (see photos).	The Applicant confirms that the tags referred to are not associated with the Scheme, its appointed consultants, or any survey teams acting on its behalf. The Applicant understands that SSEN has been undertaking works in the area recently; however, it is unable to confirm whether the tags are associated with those works. The Applicant remains available to engage with local residents and stakeholders throughout the Examination and encourages anyone with queries or concerns of this nature to contact the community engagement team using the contact details available on the project website (www.limedownsolar.co.uk), so that these can be investigated and, where possible, resolved promptly.
HH-002	Arboriculture	Holyrood Church Tree Tag	We have found an additional tag #0840 on the oak in front of Holyrood Church (GII* listed 11th century)	The Applicant refers to its response to HH-001.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			which is adjacent to the church lynch gate (see photos).	
HH-003	Cultural Heritage Arboriculture	Rodbourne Conservation Area	Our property is The Old School, a GII listed building in Rodbourne conservation area, which was built by Rodbourne Estate in 1851, designed by [REDACTED]*. The Old School sits set back a little from the lane through Rodbourne. The two historic oaks in our front garden are part of a great avenue of Oaks which predate the School and line the lane from Parsloe Farm through and beyond the village towards Corston. The Old School ceased to be a school in 1971, and was sold off by [REDACTED] in 2021. Some parts of the village verges remain in [REDACTED] ownership, but the verges in front of the Old School were sold off by [REDACTED] to predecessor, and subsequently were part of the sale when we purchased the house in 2024. For reference [REDACTED] is the Rodbourne land owner involved in the	No significant effects have been identified as a result of the Scheme to heritage assets within Rodbourne (see ES Volume 1 Chapter 12: Cultural Heritage [REP3-017], supported by ES Volume 3, Appendix 12-1 Heritage Statement [APP-219]). With consideration to Rodbourne Conservation Area, embedded mitigation including the removal of Fields E5 and E8 from the Scheme Order Limits, removal of panels from Fields E7, E9 and E10, offsets to the PROW and enhanced screening of existing hedgerows are considered sufficient mitigation to remove any adverse impacts to the Conservation Area.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			Lime Down Scheme. Since 2021 land registry records (ref WT253768) showed clearly that the verges to the road here are the property of the Old School (see plan below) This particular piece of land was previously covered by WT223727 - WT253768 consolidated these two pieces of land in 2021. <i>*[REDACTED] Pollen was the second son of the Baronet who owned Rodbourne estate from the 18th century, and was a friend and collaborator with [REDACTED] the Pre-Raphaelite Brotherhood and first curator of the V&A under [REDACTED] designs and papers are held at the Bodleian and some at Wiltshire History Centre. [REDACTED] designs for the School include heavy use of oak leaves and acorns mimicking the surrounding avenue. The School is directly opposite the Holy Rood which dates from c720 AD.</i>	

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				
HH-004	Arboriculture	Private Property Tree Tag	We write to you to request information from IGP as to whether this action and trespass has been carried out by them, not just for our own concern, but also that of the community - we are all most distressed by this worrying development on top of our existing concerns.	The Applicant refers to its response to HH-001.
HH-005	Transport and Access Arboriculture	Traffic Impact on Trees	This suggests that Lime Down plan to bring huge lorries through our village (on an utterly inappropriate and inadequate lane), will worse still have a negative impact on this avenue of oaks and other ancient trees which	The Applicant can confirm that the construction routes do not go through Rodbourne Village.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			give Rodbourne it's distinct appearance, shade and biodiversity.	
HH-006	Transport and Access Cultural Heritage	Traffic Impact on Roman Brickworks	Worryingly the corner where they propose to access the track south towards Lower Stanton st Quentin has oaks outside of the Rodbourne conservation area, these are sited on the ancient roman brickworks.	ES Volume 1, Chapter 12: Cultural Heritage [REP3-017], supported by ES Volume 3 Appendix 12-2 to 12-5 [APP-220 to APP-229] has assessed the potential impact of the scheme on identified archaeological assets. Where required appropriate mitigation is proposed. See Section 12.9 of ES Volume 1 Chapter 12: Cultural Heritage [REP3-017] for embedded mitigation and Section 12.11 for additional mitigation. An overarching archaeological mitigation strategy is provided in ES Volume 3, Appendix 12-6: Outline Archaeological Mitigation Strategy [EN010168/APP/6.3] updated at Deadline 6.
HH-007	Description and DCO Process	Land Registry	It is also concerning that if IGP are responsible, they are potentially making decisions using out of date documents, based on historic land holdings, not current land registry documents.	The Applicant refers to HH-001. Nonetheless, the Applicant confirms it maintains accurate and up-to-date land ownership records through the regular refresh of Land Registry data throughout the project lifecycle. This process ensures that any changes in ownership,

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
				title details, or land interests are identified and incorporated into the project's land referencing database and associated documentation. By undertaking these updates on a consistent basis, the Applicant helps to ensure that the information contained within the application documents remains robust, current, and reflective of the latest available Land Registry records.
HH-008	Description and DCO Process	Developer and Surveys	Given the behaviour lately by IGP, installing listening equipment on land not involved in the project, and cameras on public footpaths and highways, seemingly without the proper permissions for GDPR (again over this last week) every aspect of our life is being invaded by this egregious scheme.	The Applicant confirms that the cameras used to survey non- motorised users in response to examination, were video only, and had an Information sign attached with contact details. WC were contacted prior to the ten-day notice period to undertake the surveys. The surveys were undertaken by an independent third-party survey company with the required permissions.
HH-009	Description and DCO Process Human Health	Access to Private Land	We object in the strongest possible terms to whoever trespassed on our land. If this was IGP, then we demand to know the reason for attaching tags to our tree and understand what their intentions are. It would seem extremely unlikely that any other person or organisation has	The Applicant confirms that it has not trespassed over the respondent's land and refers to response in HH-001.

Reference	Theme	Issue	Comments/Issues Raised	Applicant's Response
			done this, if this has been actioned by IGP it represents yet another infringement of our rights and the knock on impact on everyone's mental health from this calamitous scheme - it is truly causing so much anxiety and ill health.	
HH-010	Arboriculture	Trees and Landscape Setting	We respectfully urge the EA to view these trees on their next site visit to understand their importance, we would also hugely appreciate it if you could look at the proposed site at E from our sitting room's vast end window to see how much this part of the scheme will negatively impact this building's context and landscape setting, both inside and out.	The Applicant notes this comment and refers to response to HH-001.