

LIME DOWN SOLAR PROJECT

**DEADLINE 6 SUBMISSIONS
STOP LIME DOWN**

August 2026



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1. Introduction

1.1.1. This document and the attached papers comprise Stop Lime Down's (**SLD('s)**) Deadline 6 submission. This document will address:

- Comments on any submissions received at Deadline 5;
- Comments on the responses to the ExA's second written questions ("**ExQ2**")

1.1.2. This written submission uses the document reference for the tracked version of documents where multiple versions of the document exist in the Document Library.

1.1.3. This document does not provide any comments from SLD's traffic expert, Mr. Bruce Bamber, as Mr. Bamber is currently on annual leave. As mentioned in SLD's Deadline 5 submissions, SLD proposes to submit delayed comments from Mr. Bamber on or before 7 September 2026. SLD apologises for the delay in submitting these comments, and would respectfully request and welcome the ExA accepting SLD's traffic and transport submissions from Mr. Bamber late so that his evidence is accepted in the Examination and available to the parties at least a week in advance of the reserved weeks for hearings. SLD recognises that, if accepted, this would be an exceptional step.

1.1.4. SLD welcome any questions that the ExA or any other party (including the Applicant) may have about this submission. SLD will continue to take steps to assist the ExA and advance its case throughout the remainder of the Examination.

1.1.5. This submission has not been produced with the use of AI.

1.1.6. The following appendices are attached to this submission:

Appendix	Title
A	Landscape Comments on Deadline 5 Submissions

B	University of Derby Comments on the Applicant's Updated Climate Papers
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2. Comments on Deadline 5 Submissions

2.1. Landscape

2.1.1. Comments from SLD's landscape expert, Ms. Carly Tinkler, have been included at the end of this document as Appendix A.

2.2. Ecology and Biodiversity

2.2.1. For the avoidance of doubt, SLD does not repeat points here which it has already made in response to answers to ExQ2.

REP5-098 – Applicant's Response to Submissions Received at Deadline 4

2.2.2. RT-002: The Applicant has explained that individual hedgerow has been identified which will be removed within the Cable Route Corridor, although detailed locations for proposed crossings within the listed hedgerow is not known at this stage. SLD query on what basis the Applicant is satisfied those crossings will be usable. Equally while the Applicant explains that the oEPMS is "*designed to minimise potential adverse impacts on sensitive receptors, including ecological features such as protected and notable species*" – without such detailed information, it is unclear how the Applicant be satisfied that such impacts will be avoided.

2.2.3. SLD1-045: The Applicant responds to SLD's concern that weather can have a significant impact on the effectiveness of pre-clearance searches. The Applicant explains that potential issues such as seasonality and inclement weather conditions are to be taken into account by the EcoCoW's experience, delaying until weather conditions improve if required.

2.2.4. However, while an experienced EcoCoW is more likely to find species, this would not address cases where weather or seasonality removes or obscures the features and signs of activity you would use to confirm species presence. Mr.

Valori is further sceptical that an EcoCow would realistically delay works when weather conditions are suboptimal, the work crew is present but otherwise no signs of fauna activity are found.

2.2.5. While these limitations are part of the normal, accepted realities of pre-clearance searches, they are of particular importance here given the extent of the Applicant's mitigation strategy which hinges on them being effective. In many cases, the Applicant's pre-clearances will be the only real inspection for a number of species, including dormouse, and the only real data informing the eventual mitigation and cable route within each microsite. If the data from a single visit is susceptible to weather conditions, then the subsequent ad-hoc mitigation approach advised will be similarly flawed, and risk of a legal breach will be much higher than if the Applicant had allowed for more time to carry out a proper nest tube or track search.

REP5-080 – Outline Landscape and Ecological Management Plan

2.2.6. At §1.4.4 the Applicant explains that an indicative schedule of monitoring at the Solar PV Sites would comprise UKHab Survey and Botanical quadrats undertaken in Years 1, 2, 3, and 5 post-construction, and then every five years for the lifetime of the Scheme. However, the Applicant clarifies that breeding bird surveys and any additional species-specific surveys are likely to be undertaken *“less frequently to monitor changes in the longer time, with visits anticipated to be undertaken every 5 years.”*

2.2.7. Mr. Valori queries this distinction and the justification for conducting surveys in respect of breeding birds with less regularity, given that loss of nesting habitat has been identified by the Applicant as a major long-term ecological impact of the proposal. Adaptive management has been highlighted as a potential tool to ensure impacts are at least in part mitigated, with set-aside fields enhanced accordingly. Given the need to confirm that these enhancements and management measures are being implemented and working effectively as

intended in the initial years, and the already stated commitment to monitoring vegetation throughout Y1, Y2, Y3 and Y5, Mr. Valori questions why a similar monitoring frequency is not proposed for birds in the initial five-year cycle.

2.2.8. In respect of grassland habitat, SLD notes that the Applicant proposes for grassland management to include grazing by sheep during Year 1 following a haycut between late July and September (§1.3.98). It is anticipated that low intensity grazing “*may be employed*” throughout the year within all areas of the Sites where panel arrays are proposed (§§1.3.105-1.3.108), and every three years where tussock grassland is being managed.

2.2.9. As explained within SLD’s LVIR [REP1-170], there are many problems associated with keeping and managing animals within solar arrays at scale and only a few examples of commercial solar sites in the UK which have been or are currently being grazed by sheep or other animals. At the ISH and in response to ExA questions, the Applicant has explained that it considers mitigation would still be effective in the absence of grazing. SLD seeks clarity as to what will occur in respect of habitat management where grazing is not a practical or viable option.

2.3. Hydrology

REP5-030 to REP5-036 - Figures 11-1 to 11-7 Fluvial and Surface Water Flood Maps

2.3.1. The flood maps have been updated by adding in what appears to be a scale plan of the solar panel rows. The flood risk maps incorporate EA maps showing both surface water flooding and fluvial flooding. The latter is only calculated where the catchment areas are large enough – in other parts of the site, surface water flooding has to stand proxy for fluvial flood risk. On the Area C1 map [REP5-032], the surface water flooding extent has been completely omitted from the panel areas. There are also omissions in parts of the Area A map [REP5-030]. These omissions give a misleading impression of surface water flood risk and should be corrected.

2.3.2. Additions to the maps requested by the ExA have provided some valuable insights into how well the solar panel areas are connected to the drainage network, both in the form of dug ditches (though not all of these are shown) and flow paths which show up as connected areas on the Risk of Flooding from Surface Water (RoFSW) maps incorporated in the Flood Map for Planning, which form connected pathways at times of high flow:

- Ditches intercept overland flow routes from the panels in many places (e.g. Fields A9, B6, B7, B11, C7, C34, C14, C15, D1, D2, D3, D4, D5, D6, D7, D8, D11, D19, D20, D21, D22, D23, D24, E2, E3, E11, E17, E20, E21, E24, E31, E32, E33, E34);
- Fields containing RoSWF areas include A2, A6, A7, C7, C14, C19, C21, C22, E4, E12, E33 and E34;
- Fields close to RoSWF channels include A2, A6, A7, A9, A10, C7, C19, C21, C22, E2, E3, E4, E14, E15, E17, E18, E19, E33 and E34;
- Fields close to ordinary watercourses or main rivers include A10, B10, C22, D8, D11, D12, D13, D14, D16, E4, E12, E13, E14, E19, E20, E21, E23, E24, E25, E26, E27 and E34;
- Panels are located in areas at risk of fluvial flooding in Flood Zones 2 or 3 in Fields D12, D13, D14, D17, E22, E24 and E26;

2.3.3. The maps thus show that most of the panel areas are well-connected to the existing drainage network, which implies that the areas with enhanced runoff as demonstrated in [REP5-130] Appendix D are likely to transmit the excess water to the river system reasonably quickly. The drainage ditches and overland flowpaths flow into the ephemeral stream network and from there into the four permanent streams that drain into the Avon – the Rodbourne Brook, Gauze Brook, Norton Brook and the un-named stream entering the Avon upstream of Whatley Manor. The fluvial and surface water flood maps thus provide evidence that flood risk is likely to increase off site due to the Scheme, though they do not allow it to be quantified.

REP5-096 – Hydraulic Modelling Report

2.3.4. The hydraulic modelling report for the Gauze Brook has been updated from the original version produced at Deadline 3 [**REP3-131**] to take into account comments from the Environment Agency. A more sophisticated version of the model has been used, and there are improved measurements of the culvert which conducts the Gauze Brook under the railway.

2.3.5. The presentation in the tracked changes report appears to show that the revised model produces smaller flood depths towards Corston but a wider flood extent on the floodplain above Corston than the original model. Although larger, the modelled flood extent [**REP5-096**] **Figure 4** is still smaller than that observed during Storm Bert even for the 1% AEP +39% climate change event. Storm Bert was an approximately 1% AEP event ([**REP1-176**]). This suggests that the modelling is still underestimating real flood extents.

2.3.6. The report goes on to model peak flows in the Gauze Brook and its two tributaries utilising methods from the UK Centre for Ecology & Hydrology's Flood Estimation handbook (FEH), as was done for the Rodbourne Brook in [**REP4-089**]. Stop Lime Down's Deadline 5 Submission [**REP5-130**] §2.6.12 to 2.6.17 identifies flaws in the modelling of the Rodbourne Brook and what was then known of the Gauze Brook modelling. In particular, there was data available from flow gauges to enable the model predictions to be checked.

2.3.7. The Applicant is aware of this gauge but states:

“The Rodbourne river gauge station (53020 Gauze Brook @ Rodbourne) is located a short distance downstream of the study area; however, this is designated as a low flow station to monitor the impact of groundwater abstraction/recharge on river flow and is not indicated as being suitable for QMED estimates or pooling. Gauze Brook is therefore considered to be

ungauged within the study area.” (QMED is the median annual maximum flood).”

2.3.8. While the fact that the gauge is designed primarily for monitoring low flows is acknowledged, the national databases still hold data from the Rodbourne gauge at higher flows. However, SLD acknowledges that they are marked as “estimated” and are probably of lower accuracy than those from a full-range gauge. On this basis, the Applicant has utilized data from analogous “donor” sites with similar characteristics. SLD accepts that this approach is consistent with FEH method, although notes that many of these “donor” sites are from very different parts of the country.

2.3.9. The 30-year return period flood peak according to the model is given as 10.54 m³s⁻¹ ([REP5-096] Section 6.5) – in other words this flow should be exceeded once every 30 years on average. Professor Skeffington notes however that if the flow gauge data were utilized, the data would show this output flow exceeded at least 25 times in the last 30 years. This supports SLD’s concern that the Applicant’s modelling is underestimating flood extents.

2.3.10. The Report also observes that “*sewer networks are unlikely to extend the topographic catchment*” (Section 3.3). However, as SLD pointed out in [REP5-130]§2.6.16, the Gauze Brook takes sewage input from Grittleton which is outside the Gauze Brook catchment boundary. As stated before, although the volume of sewage will probably not be material, the area has a problem with groundwater influx into foul drainage pipes which can increase 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, which will increase Gauze Brook flows over those calculated.

REP5-098 – The Applicant’s Response to Submissions Received at Deadline 4

2.3.11. SLD1-094: SLD agrees that the issues mentioned in the Applicant’s third paragraph are important. SLD does not accept that the Applicant has properly addressed them in the reports cited, and refers the Applicant to SLD’s Deadline 5 Submission ([**REP5-130**] Appendix D) where modelling is used to demonstrate the heightened risk of runoff under panels from many of the soil types on site.

2.3.12. SLD1-095: SLD acknowledges that the Applicant has produced a clearer explanation of the Manning’s modelling, though it maintains its position, supported by the EA in [**REP3-146**] FHW1.5, that the results are not credible. The EA observes:

“The analysis submitted by SLD with respect to the applicant’s calculated flows based on the Mannings equation is correct in that the calculated flows are large at some of the cross-sections and unrealistic when placed in the context of catchment area and recorded flows on the River Avon at Fosse Way and Great Somerford, and on the Gauze Brook at Rodbourne for Storm Bert in 2024. As an example, the catchment where the flow calculation of 154.2m³ /s is shown for cross section C1-2 within Lime Down C1 has an area of 3.91km² based on the Flood Estimation Handbook (FEH) webservice (catchment outlet grid reference: 387200,183950). The true peak 0.1% (1 in 1000) annual exceedance probability flow could be potentially an order of magnitude or more lower than 154.2m³ /s based off catchment area”

2.3.13. The EA then explains that the Manning’s modelling was in support of using the Risk of Flooding from Surface Water (RoFSW) mapping as a proxy for fluvial flood risk, where the latter is not mapped. SLD does not dissent from the use of the RoFSW mapping in this way, but would suggest that the Manning’s modelling should be producing more credible results before it can be used to support this, or any other, proposition.

2.3.14. SLD1-097: SLD notes that the issue in respect of sensitive equipment within the floodplain has now resolved. The Applicant has committed to a maximum height of 4.5 m for the tracking panels and 3.5 m for the fixed panels without submerging sensitive equipment. The Applicant has committed to the panels being positioned no less than 0.6m above the design flood level.

REP5-109 – Natural Flood Management Viability Report

2.3.15. This report uses the hydraulic model developed in **[REP5-096]** to investigate the possibilities for control of flooding in Corston by Natural Flood Management (NFM) in the Lime Down D area, concluding that NFM is not a viable option. NFM options were scoped by using SCALGO NatureInsight which is a screening tool developed by SCALGO, a Danish environmental software company, and Arup, an engineering consultancy. This ruled out “*structural or high-storage interventions such as runoff attenuation features, floodplain reconnection, or large woody debris, due to local slope, land use constraints, and limited upstream flow accumulation. Instead, NatureInsight prioritised non-structural interventions that focus on enhancing topsoil permeability, avoiding bare soil, and increasing surface roughness along agricultural boundaries to promote localised infiltration.*”

2.3.16. The report points out, however, that because the Lime Down D area is only a small proportion of the Gauze Brook catchment, this would have a negligible effect on flooding in Corston. Notwithstanding the NatureInsight results, which look a little crude, they attempted to model structural interventions by modelling the excavation of the floodplain by 300 mm or 600 mm. These had no effects at all at Corston in the modelling, because the 8m buffer strip round the stream channels largely prevented the storage volume from filling. This is hardly an insuperable problem as an engineered filling facility could be provided. SLD accepts, as the Applicant’s expert observes, that these large interventions are only about a quarter of what would be needed to prevent flooding by the 1% AEP + 39% event.

2.3.17. Alleviation of smaller but more frequent floods would be more feasible and could still be worthwhile, but there is no analysis of this.

2.3.18. The Applicant's expert also points out that the road bridge over the A429 restricts high flows and is a major cause of flooding in the village (a "*conveyance constraint*"). The model results and local experience suggest this is a valid point. The Applicant's expert recommends hard engineering solutions to address the problem and offer the model files free of charge to anyone designing a future scheme.

2.4. Climate

2.4.1. The University of Derby has reviewed **REP5-108** (Climate Change Response to Stop Lime Down Appendix D) and **REP5-023** (Updated ES Chapter 7), comments on which are provided within Appendix B to this document.

2.5. Socioeconomic Impacts

REP5-098 – The Applicant's Response to Submissions Received at Deadline 4

2.5.1. WM-005: The Applicant responds to criticism that there has been no engagement with Whatley Manor. It explains that Whatley Manor was located within the core consultation zone within the Consultation Report [**APP-022**], and that "*the primary reasons for Whatley Manor Hotel not being given additional consideration as a business receptor is due to: its distance from the Scheme at a minimum of 1.5km to the north of Lime Down B, intervening topography and vegetation largely limiting any visual impacts to clients at the hotel; and that the usual approaches to the hotel (particularly for guests travelling from afar) would be along routes that are negligible affected by construction traffic (the A429 from M4 J17 to Malmesbury, or the A46 and B4039 from M4 J18 through Luckington and Sherston.)*" SLD does not accept that any of these reasons offer a satisfactory reason for not engaging with Whatley Manor further. As discussed further below,

the Applicant should have conducted a wider assessment having regard to the scale of the Scheme.

REP5-111 – Technical Note on Impacts to Non-Equine Businesses

2.5.2. The Applicant has drafted a technical note on impacts to non-equine businesses in response to the Examining Authority's question SE2.2, which explains that a technical note should be provided which details *"the nature of the affected business, their concerns, and what the applicant has done to address those concerns."*

2.5.3. SLD has serious doubts in respect of the quality of the Applicant's baseline assessment. At §2.1, the Applicant identifies a "5 km Study Area" covering *"an area of more 390m2 over much of northwest of Wiltshire and a small portion of the neighbouring South Gloucestershire and Cotswold District."* Setting aside the grammatical errors in this sentence, SLD does not understand what area was selected, how it was selected, or on what basis. Principally, SLD requests that the Applicant provide a map outlining the scope of the Study Area and on what basis it was drawn.

2.5.4. Secondly, and in any event, within 5km of the Solar PV Sites is too small an area of search for the purpose of assessing local impacts. Given the scale of the scheme, it would be reasonable for a regional impact study to have been undertaken on the basis of administrative area boundaries. Alternatively, given the proximity to the Cotswolds, it would have been reasonable for this study to extend into the Cotswolds district, taking into account the functional economic geography of the area.

2.5.5. Thirdly, SLD have doubts in respect of the quality of the data relied upon for Table 1. Table 1 identifies the *"proportion of businesses and employment in the 5km Study Area and within 5km of the Solar PV Sites"*, relying apparently on the UK Business Count 2025 and the Business Register and Employment Survey

2024. Table 1 identifies the largest business sector within the 5km Study Area as construction and professional, scientific, and technical. The latter is perhaps unsurprising, given the proximity of the Dyson Campus outside Malmesbury, but construction being the largest business sector does not align with local understanding. SLD would invite the Applicant to provide it the data relied upon for producing the percentages within Table 1.

2.5.6. At §2.1.3, the Applicant then states:

“Table 1 identified that the largest industries in the 5 km Study Area by number of registered businesses and employment are in construction, and professional, scientific & technical services. The latter is very apparent in the area within 5 km of the Solar PV Sites, as a result of the large quantum of workers at the Dyson Campus outside Malmesbury. The area within 5 km of the Solar PV Sites also has the notable characteristic of a large accommodation & food services employment but not a similarly large business registry, implying that there are more larger employers in this industry near the Solar PV sites than is found further along the Cable Route Corridor. This is understood due to the larger accommodation venues at Whatley Manor Hotel, Manor House Castle Combe, and the location of the M4 Leigh Delamere motorway services. Other visitor dependent sectors, such as retail and arts, entertainment, recreation & other services are generally consistent across the 5 km Study Area.”

2.5.7. SLD does not understand on what basis the Applicant concludes from Table 1 at §2.1.3 that *“there are more larger employers in this industry near the Solar PV Sites than is found further along the cable route corridor.”* Again, SLD seeks clarity on the point which the Applicant is seeking to make.

2.5.8. While Whatley Manor is within 5km of the Solar PV Sites, the relevance of Manor House Castle Combe and M4 Leigh Delamere is not understood – save that the latter two may be just within 5km of the cable route corridor. It is assumed then, that the Study Area must include large towns south of the M4, such as Chippenham and Corsham. However, it appears that Malmesbury has been

excluded, despite being a town which is much closer to the PV panels and a tourist destination which is far more likely to be impacted during both construction and operation than large towns along the cable route.

2.5.9. At §2.1.4, the Applicant states that it has “*largely sought to avoid land adjacent to settlements, and as such has largely avoided direct impacts to the majority of business premises or services associated with those settlements.*” However, it is difficult to understand how the Applicant has reached this conclusion, given the Scheme’s proximity to settlements including Malmesbury, Sherston, Hullavington, Alderton, Foxley, Luckington, Corston, Rodbourne, Stanton St Quintin and Norton – and without having conducted a survey of the many businesses which will be impacted by the scheme (including many of those in the hospitality and tourism industries).

2.5.10. SLD are surprised by the Applicant’s explanation, at §4.4.6, that a comprehensive business survey was not conducted because it would have been too onerous for a scheme of this size. Clearly, the size and scale of the scheme offer a basis for assessing those business impacts in greater detail – as opposed to relying on deeply flawed desk-based assessments.

2.5.11. SLD is in the process of producing a business survey, coordinated by a small number of volunteers. A questionnaire was circulated to businesses within the vicinity of the scheme for comment around the end of July. That questionnaire has asked businesses to describe their business/ organisation/ charity, its approximate turnover, the number of employees and any likely effects anticipated by the Scheme. While SLD accept that this survey will have some shortcomings (SLD is relying upon a small number of volunteers who are unable, of course, to undertake a full survey of every business), it is hoped that a sample of local businesses will be suitably illustrative of potential impacts. SLD have been careful to approach as broad a number of companies and commercial organisations as can be reasonably expected, including hospitality, equine business, agriculture, retail, and leisure companies. The only organisations intentionally excluded are

those involved directly with the Scheme, such as those landowners whose farmland is part of the project, and their tenant farmers.

2.5.12. At the time of writing, SLD has received 74 responses. SLD has committed to keeping the survey open until September, so that businesses have an opportunity to respond after the summer break and a greater number of responses received before it is presented. To date, 68.9% of responses anticipate that Lime Down is likely to have a negative effect on their organisation, and 20.7% anticipate a severely negative effect. Of those who believed that the effect would be negative or severe (89.6% of those sampled):

- 83.8% have identified increased traffic volumes and congestion as a cause of those negative effects;
- 70.6% believe that customers will relocate away from the area;
- 66.2% believe increased noise will have a negative effect;
- 60.3% identify reduced local visitor numbers and 44.1% identify reduced international visitors as a concern;
- 58.8% identify declining property valuations as a likely negative effect.

2.5.13. Additionally, 43.2% of those surveyed anticipated that the Scheme would have a material effect on the number of persons employed and lead to a decrease in the number of employees (in contrast to 55.4% who anticipated no likely effect on the number of employees). 86% anticipate that the Scheme would lead to a reduction in their annual turnover.

2.5.14. SLD intends to produce the results of this survey and the summary of its findings at Deadline 7. For the avoidance of doubt, the consent of those surveyed will be obtained before it is shared.

2.5.15. The Applicant has produced an Equine Business Report as a consolidated response to questions raised by the ExA in ExQ1 and ExQ2.

2.5.16. In SLD's view, the report has inappropriately set the threshold for its assessment at a level which obscures many other business impacts which should be taken into account. Principally, the Applicant has improperly focussed its attention on "business viability", which it defines at §4.1.1 as follows:

"Business viability relates to the ability of an equestrian facility to continue operating on a financially sustainable basis. A business remains viable where income generated through its activities is sufficient to meet operating costs. Whilst profit margins may vary considerably between different types of equestrian business, viability is generally determined by the point at which ongoing costs begin to exceed income over a sustained period."

2.5.17. Plainly, this overlooks many other impacts which the Scheme may have on equine businesses. The Applicant's assessment should not be concerned with only those businesses which will be unviable as a consequence of the Scheme. That will clearly be a significantly lower proportion than those businesses who are *affected* by the scheme. In SLD's view, the correct approach would be to consider impacts on business viability *and*, more broadly, reduction in turnover, a reduction in client numbers, reduced demand for services, or impacts on breeding and sales activity.

2.5.18. It is clear that the Applicant's approach to viability has led to it underestimating the extent and level of impacts on equestrian facilities and businesses. For example, at §6.1.3, the Applicant observes:

"6.1.3 The Technical Note recognises that the equine sector is already operating under pressure, including rising costs, recruitment difficulties and tight margins in some parts of the industry. That context is relevant when considering how individual businesses may respond to disruption or perceived risk. Against that background, the main question for this assessment has been

whether the Scheme would be likely to cause effects of a scale or duration that would materially affect the continued operation of local equestrian businesses.

6.1.4 Based on the evidence available, significant adverse effects on business viability are not expected.

[...]

“6.1.7 ...the evidence reviewed does not suggest that these construction effects would generally be of a scale likely to make equestrian businesses unworkable or commercially unviable. Construction effects would be temporary, would vary by location and phase, and can in many cases be reduced through practical controls such as timing, liaison, routing, screening and advance notice of higher-risk activities.”

2.5.19. As a result, the assessment fails entirely to assess job losses or broader economic effects on equine businesses, which may in cumulation give rise to a significant adverse effect on equine businesses. The Examiners should therefore take into account the possible extent of the impacts on equine businesses along with other economic impacts in the planning balance.

2.5.20. In respect of the Applicant's comments on horse physiology, SLD does not accept that horses (including foals and youngstock) can “*adapt quickly where disturbance is not associated with harmful or aversive experience*” (§4.2.41). This does not align with experience, and SLD would request scientific evidence to support this statement. Further, the bigger issue for many of these businesses is client confidence in the facilities in which horses are reared and cared for. Customers will not be satisfied to bring their horses to a facility where there is likely to be extended disruption as a consequence of construction and traffic or impacts on the amenity of the site as a consequence of the site's operation. Many businesses have informed SLD that they have been told by their clients that horses will be moved to competing facilities if the Scheme goes ahead.

2.5.21. Further, SLD does not accept that the Applicant's proposed mitigation is satisfactory to remove any likely significant effects:

- At §4.1.4, the Applicant suggests that business owners may be concerned about a greater need for indoor facilities. It should be noted that for most businesses, there is no scope for increasing indoor facilities as it is vital for the horses' welfare to have regular turnout, and there may be no alternative land for turnout due to ground conditions.
- At § 4.2.19 the Applicant proposes that, as part of the set up of the Community Liaison Group, *"an independent equestrian expert will be appointed to undertake regular engagement and act as a key point of contact with equestrian receptors."* It is unclear what benefit equestrian expertise will provide for the purpose of merely "notifying" equestrian businesses in respect of the scheduling of construction activities. Equally, this does not remove the harmful impact of such disruption. Many equestrian businesses do not have extra pastureland to adjust to the construction activities. Those businesses may also need to accommodate visitors from vets and farriers on a daily basis, service of which may be interrupted by construction traffic.
- At §4.2.20, the Applicant suggests that *"screening of noise sources within the construction area via the erection of temporary screens would be employed where practicable."* SLD remains doubtful that such screening would be effective for newborn horses. Further information is sought in respect of the proposed acoustic fencing.
- At §4.2.20, the Applicant suggests that construction workers within the vicinity of equestrian facilities conducting noise will be briefed on *"stopping work protocols in the event horses appear in distress or in danger."* Clarity is sought as to who will be making this decision and on what basis, given this is a matter which requires equestrian expertise.
- At §4.2.29, the Applicant suggests that *"measures will be put in place to ensure driver behaviour and physical space provisions are suitable to ensure horse and rider safety is protected."* SLD is not satisfied that this will meaningfully reduce risk to horses and their riders on roads. Given the

narrowness of many of these roads, it is unclear where the Applicant will accommodate necessary safe areas or ensure a sufficient passing space between horses and vehicles.

2.5.22. It is acknowledged that the Applicant has carried out an initial consultation exercise, as reflected within the results provided in Table 2-10 of the Applicant's Tourism and Recreation Receptor Tables [**APP-241**], which purported to identify businesses and equestrian facilities within 5km of the Order Limits in early 2025. However, SLD also notes that the Applicant has carried out an updated consultation exercise for the purpose of preparing this technical note. In the first instance, SLD would welcome clarity on to whom the questionnaire was sent and how this relates to the map prepared at Annex A. Further, it is unclear on what basis the answers provided to that questionnaire shared have affected the Applicant's conclusions, or whether the Applicant intends to reassess businesses in light of the responses received.

2.5.23. It is also noted that SLD has provided a list of equestrian properties to the Applicant, as reflected in the layer of Appendix Z "equestrian properties" [**AS-019**]. This is accompanied by a layer on "equestrian environment-riding routes." It appears to SLD that this information was not taken into account before producing the Equine Report.

2.5.24. It is further unclear how **APP-241**, fits in with Annex A of the Equine Report, which provides an updated, longer, list of equine businesses and equestrian facilities. §6.1.14 explains that "*in response to the Examining Authority's request for mapping, Annex A provides a map of equestrian facilities within the 20km study area, together with information on facility type, name, address and business activity.*" The column on the far right acknowledges that many of these businesses have not been assessed by the Applicant, including many of those which have been identified within 5km of the scheme. The Applicant has not provided any explanation as to why those businesses have not

now been assessed at this stage, or why those businesses were missed in early 2025, during the initial consultation exercise. It is also notable that some businesses are still missing, including the Saddler in Malmesbury. In SLD's view, given the scale of the scheme, and the wide-ranging effects on equestrian businesses, it is reasonable to expect the Applicant to assess equestrian effects at a regional level – and certainly beyond 5km. Accordingly, SLD seeks clarification on whether any other businesses set out in Annex A will be consulted and assessed.

2.5.25. As indicated above, the business survey presently being progressed by SLD includes equestrian businesses. SLD has also consulted many of these businesses for further comment individually and by reference to what the Applicant has produced in APP-241 and Annex A of the Equine Business Report. SLD hope to produce a summary table of these comments for the Applicant's review once consent has been obtained for their answers being shared.

2.6. Draft DCO

REP5-013 – Draft DCO

2.6.1. SLD welcomes the change made at paragraph 18 of Schedule 14 (Arbitration Rules) which confirms that any arbitration hearing and documentation will be open and accessible by the public, which is what SLD proposed. As discussed in SLD's Deadline 5 Submissions, SLD accept that account may need to be taken of those cases for environmental protection in respect of which confidentiality might be required (such as badgers).

3. Comments on Responses to ExQ2

3.1. Applicant's Responses

Reference	Response
ALT2.1	3.1.1. At Deadline 5, SLD submitted an additional note on site selection and the cable route [REP5-130, Appendix E]. SLD's case on site selection is further complemented by Appendix L of SLD's WR at Deadline 1 [REP1-186] and Appendix 1 of SLD's Deadline 3 Submission [REP3-173]. Those submissions emphasise that PDA 10 has been uniquely privileged in its selection and assessment. SLD maintain that a proper approach to site assessment would have identified sites closer to the point of connection which would have been considerably less harmful, revealed the defects of PDA 10, and directed development away from the site. 3.1.2. The Applicant's response to ALT2.1 identifies PDA 10 as having an area of 729ha when all constraints are removed. The Applicant acknowledges that there was never any suggestion that PDA10 would be combined with PDA 1, due to the substantial area of flood zone 3 between. 3.1.3. Critically, then, the Applicant's flawed approach has led to the selection of a PDA which is substantially smaller than the clusters which they have now identified (and only marginally larger than PDA 3 and PDA 12 considered individually). Evidently, if the Applicant had applied the approach adopted retrospectively in the Technical Note, Clusters 1, 2, and 3 would have been assessed and considered at an earlier stage – and constrained PDA10 would have been identified as being too small for the Scheme itself.

	1.1.2. SLD has requested at Deadline 5 that the Applicant provide a map in a similar format to that at Figure 4-6 of [REP2-043] so that some further insight into the removals from PDA10 can be understood. SLD hopes that this will be provided by the Applicant at Deadline 6.
ALT2.2	3.1.4. SLD maintains that the Applicant's approach is methodologically flawed and fails to apply a consistent methodology to (i) the selection of PDAs and (ii) to the assessment of clusters. SLD repeats the points made in Appendix L of SLD's WR at Deadline 1 [REP1-186] and Appendix 1 of SLD's Deadline 3 Submission [REP3-173]. 3.1.5. Evidently, Clusters 1, 2, and 3, have not been assessed 'consistently' where they have not been assessed at all. To date, the Applicant <i>still</i> has not conducted a RAG analysis in respect of Clusters 1, 2, and 3. 3.1.6. SLD notes that Table 2-2-1 of its response purports to retrospectively explain why Clusters 1, 2, and 3 would have been discounted in any event, repeating points already made in the Applicant's Technical Note for Site Selection [REP2-043]. While it observes that Clusters 1, 2, and 3 experience cultural heritage constraints, it fails to consider the scope for additional mitigation and buffer land within the clusters given their larger land masses. Likewise – as acknowledged by the Applicant, similarly significant cultural heritage constraints are experienced within PDA10, albeit with less scope for mitigation.

	3.1.7. Nor is it a satisfactory reason to discount the clusters on the basis that initial approaches with landowners “<i>revealed a lack of opportunity to accommodate the scheme</i>” – given the power to compulsorily acquire such land under the DCO. 3.1.8. In respect of Table 2-2-2, SLD does not accept the RAG analysis which has been presented in respect of PDA10. At a minimum, cultural heritage, access for construction traffic, and landscape should be assessed as red. 3.1.9. SLD awaits additional comment from the Applicant on its Deadline 5 submission, to which a response will be provided at Deadline 7. Ultimately, the Applicant’s responses remain no answer to the procedural issues which SLD have flagged in its earlier submissions. SLD would welcome an ISH on Alternatives for these issues to be ventilated.
ALT2.3	3.1.10. SLD have addressed this point within Appendix E of their Deadline 5 submission (pp. 162-223) [REP5-130]. In order to get a better understanding of how Lime Down compares with similar NSIP projects, SLD has analysed the solar proposals currently listed on the Planning Inspectorate’s website. Appendix E demonstrates that the Scheme is an outlier when compared to other Schemes of a similar type. SLD considers that the significant length of the cable route, far in excess of other schemes, explains some of the particularly harmful aspects of the Scheme.

ALT2.4	3.1.11. The Applicant’s response explains that situating the BESS Area at the Land at Melksham Station would have caused adverse effects on the character of Whitley, local PROWs, an adjacent Roman Road, and four Grade II listed buildings nearby. 3.1.12. That response would be satisfactory – save that the current location of the BESS has similarly adverse effects given its proximity to a Roman Road (the Fosse Way), multiple listed buildings (including the Grade I listed building, Bradfield Manor), multiple PROWs and the villages of Hullavington and Norton. 3.1.13. SLD would welcome the Applicant confirming its estimate of the cost of its 400kV connection to the National Grid substation at Melksham.
CH2.8	3.1.14. The ExA’s question asks whether the Applicant could confirm if there will be “less than substantial harm” to Avil’s Farmhouse if the Applicant accepts Stop Lime Down’s conclusion of a negligible adverse effect. The Applicant’s response does not answer the question. It repeats that it welcomes SLD’s conclusion but then concludes that there will be “<i>no harm</i>” to the grade II asset. If the Applicant agrees that there is a negligible adverse effect, it follows that there would be, at least, less than substantial harm.

EB2.3	3.1.15. Mr. Valori welcomes the Applicant's clarification that targeted surveys for riparian mammals will be undertaken two months prior to the commencement of works. However, clarification is sought as to whether the Applicant intends to carry this out as: • A set of two visits, with the second visit being two months from works commencing; • The first visit being two months prior and the second being carried out on the day of the works; • A single visit, two months from works commencing. 3.1.16. Mr. Valori notes that a standard survey method for water vole presence/absence is generally two inspections between March – October inclusive, with inspections being at least two months apart.
EB2.5	3.1.17. Mr. Valori agrees with the position expressed by Wiltshire Council in respect of white-clawed crayfish. The Applicant's commitment to a 8-15m buffer at all watercourses, while welcome, does not address ecological impacts where the Applicant purports to construct a new circa 6m wide permanent access for culverts across 'wet' ditches at Lime Down D, where suitable habitat for white-clawed crayfish exists has been assumed at one of the crossings. An assumption of species presence cannot preclude consideration of whether a mitigation licence is required to permit the works.

	3.1.18. SLD maintains its position that a white-clawed crayfish survey should be carried out ahead of works, given the exact location of the culvert is not confirmed yet and the baseline information would help inform the final location of said culvert, as well as whether a licence is needed.
EB2.8	3.1.19. The Applicant has confirmed that pre-construction checks for ecological constraints (such as active nests) undertaken by a suitably qualified EcoCoW are the primary means relied upon for mitigating potential impacts upon barn owls, nesting birds, and overwintering birds. Natural England observes that while a <i>“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 ... is supported by appropriately targeted avoidance and mitigation measures... for birds <u>the acceptability of such an approach is particularly dependent upon the quality of the underlying evidence base.</u>”</i> SLD agrees. 3.1.20. SLD maintains its concerns in respect of the quality of the Applicant’s evidence base for the CRC. Mr. Valori notes that the Applicant has relied upon habitat assessments and detailed surveys conducted within the Solar PV Sites to make assumptions in respect of species presence within the CRC. While this allows for the EcoCoW decisions to have some baseline to use as a basis, given that both Solar PV and CRC habitats are primarily agricultural land, there are features around sections of the CRC that are not present around the PV fields, Corsham Lake being a notable example.

	3.1.21. In respect of pre-clearance searches, it is noted that for trees, a more in-depth inspection with an aerial harness may be required if there are potential knot holes/hollows within a tree to be cleared that are not visible from the ground level. 3.1.22. In respect of waterfowl or wading birds, the Applicant states that the “<i>order limits are not located in close proximity to large waterbodies, coastal habitats, estuaries or wetland areas where flocks of waterfowl or wading birds often exhibit strong site fidelity to communal winter roosts or foraging areas, and regularly utilise the same surrounding fields.</i>” Mr. Valori questions the validity of this statement. It should be noted that the Applicant bases its assessment of the wintering bird baseline on wintering bird surveys conducted within the Solar PV Sites, which showed primarily wintering passerines. However, the features adjacent to the Solar PV Sites are not the same as those near the CRC. For example, Mr. Valori notes that the CRC would cross near areas such as Corsham Lake, a large waterbody surrounded by a combination of grassland and woodland. There is no lake of this type within the vicinity of the Solar PV fields. As a consequence, the Applicant may be under-estimating the presence of waterfowl or wading birds near the CRC. 3.1.23. Mr. Valori remains concerned in respect of the proposed mitigation approach for wintering birds being implemented to the extent proposed. Unlike with nesting birds, which have predictable timescales of a few weeks during which the chicks will fledge (that a developer can realistically prepare and work around), there is no guarantee that a wintering flock will move on or stay within a particular section of the CRC, even
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	throughout a single day. SLD notes this can be particularly restrictive, and seeks clarification as to whether pausing works for a day, or potentially multiple days, will be the main mitigation measure to cope with the ecological constraint of nearby flocks in winter. If not, SLD queries whether (and, if so, what) additional factors would be used to determine whether a delay, reroute or simply proceeding in spite of presence is more appropriate. Would this be on a species-basis, such as its conservation status and sensitivity to disturbance, number of individuals observed, or other factors?
EB2.14	<u>Seasonal Clearance</u> 3.1.24. The Applicant’s answer states that <i>“the Applicant does not consider it appropriate or necessary to commit to a blanket restriction on undertaking works outside of the optimal season (unless otherwise agreed) for all protected species assumed to be present within the Cable Route Corridor.”</i> The Applicant explains that <i>“committing to seasonal restrictions associated with all protected species (unless otherwise agreed) would not be proportionate, as the appropriate timing of works varies considerably between species, habitats and the nature of the activity being undertaken.”</i> 3.1.25. Fundamentally, the Applicant’s response reveals the limits in its approach of assuming presence without undertaking a species-specific survey. In theory, an assumption of presence should oblige the Applicant to implement the mitigation measures necessary to avoid and/or mitigate the harm to the species as though it were actually there, e.g. limiting works to certain times of year. Instead, the Applicant purports to

	rely upon pre-clearance searches conducted by the Ecological Clerk of Works, without committing to seasonally restricted works which may be advisable to avoid impacts where priority species are present. Consequently, far from enhancing the level of ecological protection afforded to species on site, the approach of assuming presence reduces protection to a generic approach. <u>Dormice – Seasonal Clearance</u> 3.1.26. In respect of dormice, SLD note that the ExA records the Applicant as having committed to out of season works in relation to dormice in its SoCG with Natural England [REP4-063]. SLD agrees with the point raised by Wiltshire Council in response to EB2.14. There is a discrepancy between what the Applicant states in the SoCG and what is actually stated within the EPMS. Within the SoCG with Natural England, the Applicant has committed that <i>“proposed works align with recommended seasonal timings to avoid impacts to breeding or hibernating dormice or provide clear justification where non-standard timings are proposed.”</i> It should be noted that this does not restrict the Applicant from conducting works at seasonally inappropriate times – only when “clear justification” has not been provided. 3.1.27. Within the EPMS [REP5-082], at Method Statement 13, the Applicant has stated (SLD’s emphasis): <u>“Where no signs of dormice or their nests are found within a particular section, <i>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</i></u>
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	<u>one location</u>, meaning all areas can be comprehensively checked in accordance with Mammal Society guidance 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.” 3.1.28. SLD agrees with Wiltshire Council’s observation that Natural England appear to be assuming that hedgerow removal will be sensitively and seasonally timed to avoid the dormouse breeding and hibernating season. However, Method Statement 13 (which is specific to dormice) does not stipulate any seasonally restricted works. Mr. Valori seeks clarification from Natural England as to whether it would be acceptable for works to take place which conflict with dormouse clearance seasonality outlined within Mammal Society dormouse mitigation guidelines. <u>Dormice – Two Stage Clearance</u> 3.1.29. Equally, Natural England appear to be assuming that two-stage clearance will occur generally for dormice. If that is the case, that assumption is incorrect. As set out above, the Applicant has only committed to two-stage clearances in some areas of dense vegetation. The Applicant justifies its approach on the basis that the habitat is not particularly suitable for dormice and the impacts on dormice are not extensive in size, implying that any mitigation other than pre-clearance searches will not be required.
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3.1.30. Mr. Valori would challenge all three of those assumptions. the majority of hedgerows and boundary features within the order limits have been defined by the Applicant as “ecologically important”, historical records for species such as dormouse are present within habitats adjacent to the CRC and it crossing points, and even though the individual access gaps are small the length of the CRC and to a lesser extent its linear nature (which due to its need for two cuts at the entrance and exit of a field requires separating boundary hedgerows into two separate halves) do bring into question whether the extent of its short-term impacts are as small as they state.

Dormice - Surveys

3.1.31. Finally, SLD notes Natural England’s comments that “*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.*” For the avoidance of doubt, SLD do not oppose a two-stage clearance approach during seasonal timings to avoid impacts on breeding or hibernating dormice. Mr. Valori agrees that a method statement for the removal of dormice habitat can be an effective means of avoiding impacts. However, SLD remain concerned that out of season work will inevitably take place on a scheme of this size (given the many competing deadlines), in which case there will be further reliance on pre-clearance searches conducted by the EcoCoW without an adequately informed baseline.

	3.1.32. While SLD acknowledge that even full surveys may not provide a complete picture (as with similar types of elusive fauna), the Applicant's approach currently hinges heavily on the EcoCoW's discretion for key mitigation decisions for all stages of construction. Even a basic dormouse survey would support the EcoCoW in identifying sections of hedgerow which are likely to see higher levels of activity – especially if a decision has to be made out of season on the day of works.
FHW2.8	3.1.33. In its response to this question, the Applicant states that it does not consider a separate water management plan to be necessary, but considers that water management should be addressed through the detailed management plan applicable to each phase of the Scheme. 3.1.34. SLD disagrees and reiterates the submissions made at Deadline 5. 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. 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. 3.1.35. A key example here may be the Applicant's oLEMP. Currently, the oLEMP states that "<i>newly planted hedgerows shall be regularly watered in their first summer...</i>" (§1.3.30) and "<i>thereafter as required to ensure successful establishment</i>" (§1.3.45). Nothing else is said in respect of the frequency of water, nor how

	watering will be managed where the region experiences drought. SLD notes that the amount of water required for hedgerow is substantial and would need to be managed within a water management plan, given the extent of new hedgerow which the Applicant proposes to create. The same point applies in respect of the Applicant's other planting measures.
GCT2.6	3.1.36. SLD welcomes a requirement for incorporating a reporting mechanism within the outline OEMP to notify Wiltshire of "<i>significant</i>" replacement activities. SLD seeks clarity on the meaning of "<i>significant</i>" and invites the Council to identify those activities which may be significant replacement activities.
HW2.1	3.1.37. SLD agrees with the response set out by Wiltshire Council to this question, which it considers appropriately identifies the valuable points arising out of the SGD and the appropriate role for the CLG. In particular, SLD supports Wiltshire Council's proposal that community representatives receive appropriate training and support to help them understand the project and fulfil their community facing role. Members should not, however, be expected to manage communications or technical issues on behalf of the Applicant. 3.1.38. The Applicant's response suggests that the CLG will function as an "<i>information giving forum</i>." SLD hopes that the CLG's role will go beyond this and facilitate opportunities for genuine collaboration and an ability to influence outcomes (as recommended by the SGD).

	3.1.39. SLD has not seen a copy of the draft Terms of Reference for the CLG which was sent to Wiltshire Council on 4th August 2026. SLD would welcome having sight of this document, so that it can offer input from a community perspective. 3.1.40. SLD awaits a response from the Applicant in respect of its proposal that there should be 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 members and parish councils near the solar PV sites.
LV2.1	3.1.41. SLD notes Natural England's comment on LV2.1 that "<i>the habitat creation measures proposed as part of the scheme are in themselves highly significant</i>" and can take "<i>many decades to achieve their full ecological potential.</i>" Mr Valori notes and echoes Natural England's concern that the enhancements proposed would be ultimately removed at decommissioning, so the duration of the benefit within the context of the wider landscape is ultimately temporary. This is coupled with the amount of time it may take for a lowland meadow habitat to establish; even in a best-case scenario under optimal management present assumptions expect a timescale of over a decade to reach this target, with on-site habitats likely to be more transitional neutral or calcareous grassland habitats during that time. The full, stated ecological benefits may therefore only exist for a shorter period of time. 3.1.42. Further comment by SLD's landscape expert on LV2.1 is set out in Appendix A below.

LV2.5	3.1.43. Ms. Carly Tinkler's comments on responses to this question by the parties are set out in Appendix A below.
LV2.6	3.1.44. Ms. Carly Tinkler's comments on responses to this question by the parties are set out in Appendix A below.
LV2.7	3.1.45. Ms. Carly Tinkler's comments on responses to this question by the parties are set out in Appendix A below.
LV2.10	3.1.46. SLD welcomes confirmation that the Applicant has now contacted the operator of Badminton Airfield. This is consistent with current CAA safeguarding guidance, which expects engagement with affected airfields. The fact that the airfield had not previously made representations should not be taken to mean that the predicted glare is acceptable. The Applicant concludes that the yellow glare can be operationally accommodated. SLD considers that this conclusion should be confirmed through consultation with the airfield operator and consideration of how the predicted glare may affect its operations.

LV2.11	3.1.47. SLD accepts that the former FAA/Sandia methodology is widely used internationally and provides a useful way of classifying the intensity of predicted solar reflections. The concern is not its use. The concern is relying on it alone to determine whether the predicted glare is acceptable in the UK. 3.1.48. The Applicant relies on the fact that the former 2013 FAA interim guidance does not set a duration limit for green glare. However, this guidance was developed for a specific US purpose and has since been replaced. It should not be considered in isolation from current UK CAA guidance or from the way the affected airfields actually operate. The fact that there is no numerical duration limit does not mean that duration, frequency and cumulative exposure are irrelevant. 3.1.49. Pager Power's own guidance supports this point. It identifies duration, timing, intensity and the length of approach affected as matters that should be considered when assessing aviation glare. It also calls for a pragmatic assessment of whether a reflection may present an aviation hazard. 3.1.50. The concern at Lime Down is the scale of the development and the cumulative effect from multiple arrays. More than 12,000 minutes of predicted green glare on visual approaches cannot, in SLD's view, be dismissed simply because each individual reflection falls within the green category. SLD is not saying that green glare is automatically unacceptable. The point is that the Applicant has not yet demonstrated that the duration, spread and cumulative effect of the glare are acceptable for these airfields. Given the scale of Lime
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	Down, this requires a more detailed operational assessment and direct engagement with the affected airfield operators.
LV2.12	3.1.51. SLD notes the Applicant's statement that the Pager Power guidance was developed following consultation with National Highways and Network Rail. This appears to go further than the guidance itself, which describes the document as a methodology recommended by Pager Power and developed from its own assessment experience. 3.1.52. This was also discussed directly with Pager Power. During that meeting, Pager Power did not state that its guidance had been developed through a formal consultation or validation process with the relevant authorities. The discussion was that the guidance had been developed from Pager Power's experience and had been used on numerous projects. These are different points. Engagement on individual projects is not the same as formal consultation on, or endorsement of, the guidance itself. 3.1.53. The same applies to projects that may have been accepted by National Highways, Network Rail or other bodies. Approval of a project where the Pager Power methodology was used does not mean that the authority has formally endorsed that methodology. Likewise, extensive use of a methodology does not, by itself, amount to independent validation.

	3.1.54. There is a further issue. The Fourth Edition of the Pager Power guidance dates from September 2022 and predates the latest CAA CAST safeguarding guidance. It therefore cannot be treated as representing the current CAA position. SLD considers the Pager Power guidance to be a useful assessment tool, but not the sole basis for deciding whether the effects are acceptable. For a development the size of Lime Down, the assessment should also consider current guidance, the actual operating environment, cumulative effects, human factors and the views of the affected aviation, road and rail stakeholders.
LV2.13	3.1.55. SLD notes the Applicant's statement that Pager Power has compared its internal software with ForgeSolar and found the results to be "very similar". This is new information and is relevant to the question of software validation. However, no comparative results have been provided. 3.1.56. This point was specifically discussed at the meeting between SLD and Pager Power on 25 June 2026. SLD asked whether Pager Power's own software had been independently validated. Pager Power confirmed that it had not. It stated that the software had instead been validated through its use on numerous assessments. Pager Power also confirmed that its own software had been used for Lime Down rather than ForgeSolar. During that discussion, no mention was made of comparative testing against ForgeSolar or any other independently developed software.

	3.1.57. The Applicant now states that a comparison with ForgeSolar has been undertaken and that the results are "very similar". If the Applicant wishes to rely on this comparison as evidence that the Pager Power software is reliable, SLD considers that the comparison should be provided. This should show when it was undertaken, what was compared and the results. Simply stating that two sets of results are equivalent is not the same as independent validation. 3.1.58. There is a simple distinction here. Software being used many times shows experience in using it. It does not show that the software itself has been independently checked. This is particularly relevant where Pager Power developed the software, undertook the modelling and then assessed the results using its own guidance. 3.1.59. SLD is not suggesting that the Pager Power software is necessarily wrong. The concern is that the results should be capable of being checked. This is particularly important for Lime Down because of the size of the development and the number of aviation, road and rail receptors considered. 3.1.60. Even if the ForgeSolar comparison confirms that Pager Power's software predicts the same solar reflections, that only addresses the modelling. It does not validate how Pager Power then decides whether those reflections are acceptable. That assessment still needs to consider duration, frequency, cumulative and multi-directional effects, the type of receptor, the operating environment and human factors.
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	3.1.61. SLD therefore considers that the Applicant's response does not fully answer the validation question. If comparative analysis with ForgeSolar is being relied upon, the results should be provided so that the comparison can be independently reviewed.
NV2.2	3.1.62. The Applicant has treated the data collected at LT8 as being representative of these receptors. However, given the uncertainty arising from the differing locations and the limited sampling period represented by the measurements, a precautionary approach should be adopted. In particular, the assessment should give greater weight to the lower background sound levels recorded at LT8, rather than relying on central tendency measures such as the median, in order to avoid understating the potential noise effects at these receptors.
NV2.3	3.1.63. SLD's position remains that the proposed approach does not adequately account for the context of a very quiet receiving environment. 3.1.64. The use of a fixed threshold risks masking the degree to which operational noise would exceed the prevailing background sound level. The assessment may therefore imply that the proposed noise would be of a similar magnitude to the existing acoustic environment, when, during quieter evening and night-time periods, the operational noise would be significantly above the prevailing background levels.

	3.1.65. The research referenced by the Council in support of the proposed sleep disturbance thresholds relate to maximum noise events associated with aircraft noise. Similarly, the internal noise level guidance within BS 8233 is derived principally from research into long-term health effects and is primarily concerned with transportation noise sources. 3.1.66. Neither provides a direct basis for concluding that continuous or intermittently audible industrial noise at the proposed levels would be acceptable in the particular circumstances of this case, or that the receptors would not experience annoyance and resultant disturbance to sleep. 3.1.67. The proposed SOAEL thresholds, which represent the Applicant's committed operational targets, could result in industrial noise being audible within residential properties and, particularly where background sound levels are very low, potentially difficult to avoid or disregard. The audibility and character of the noise are therefore important considerations which are not adequately addressed by reliance on an absolute internal noise threshold alone. 3.1.68. The Applicant has previously sought to characterise the predicted noise as being comparable to that of a domestic refrigerator. However, this comparison is not necessarily reassuring. Domestic refrigerators are not normally located within bedrooms precisely because, in a quiet environment, their operational noise can
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	be readily audible and potentially disturbing or annoying. The relevant issue is therefore not simply the absolute noise level, but the audibility, character and persistence of the proposed industrial noise within an otherwise very quiet environment.
NV2.4	3.1.69. In light of the ExA question and the Applicant's updates to mitigation and assessment, we would like to highlight that the number of receptors considered in the assessment does not represent the actual number of noise sensitive dwellings affected. In particular, receptor R16 is a proxy for the entire village of Norton, which contains numerous dwellings. Thus, the actual number of high sensitivity receptors is much larger than indicated. 3.1.70. A key criticism of the Applicant's response is that it applies the concept of sustainability selectively and in a logically inconsistent manner. 3.1.71. The Applicant accepts that a number of receptors would experience operational noise levels between the LOAEL and SOAEL and acknowledges that the second aim of the Noise Policy Statement for England requires adverse effects to be mitigated and minimised where reasonably practicable.

	3.1.72. However, it then argues that additional attenuation should not be provided at several locations because silencers would either provide only limited benefit or would create maintenance and operational burdens, and therefore would not align with sustainable development. 3.1.73. The Applicant's argument appears to imply that because further mitigation may require ongoing maintenance, operational intervention, or could affect plant performance, it can be discounted as "unsustainable". 3.1.74. If accepted, that logic could be applied equally to almost any mitigation measure. It would mean that the presence of attenuation at some locations somehow justifies not providing attenuation elsewhere. That is not a rational basis for assessing whether impacts have been reduced as far as reasonably practicable. Each source and each affected receptor should be considered on its own merits. 3.1.75. The Applicant provides no evidence that the maintenance burden of additional attenuation would be disproportionate when balanced against the long-term protection of residential amenity at receptors predicted to experience adverse effects. Nor does it demonstrate why the social objective of minimising noise impacts should be given less weight than avoiding maintenance obligations.
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	3.1.76. The Applicant's conclusion that further attenuation would be contrary to sustainable development is unsupported. Sustainable development requires a balance between operational efficiency and protection of affected communities. The fact that attenuation has been accepted as appropriate at some locations demonstrates that such mitigation is both technically feasible and capable of being integrated into the Scheme. The Applicant has not demonstrated why extending equivalent mitigation to other locations would represent a disproportionate or unreasonable sustainability burden.
NV2.5	3.1.77. Monitoring should include consideration of all operational noise sources associated with the development, rather than being limited to the central BESS area, to ensure that the measured performance reflects the cumulative operational noise experienced at nearby receptors.

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 5.

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.

APPENDIX A

LANDSCAPE RESPONSE



Lime Down Solar

Comments on submissions received at Deadline 5

Carly Tinkler CMLI for Stop Lime Down

Contents

A) Change Application

B) New Documents Submitted at Deadline 5 (Applicant)

B1: Applicant's Response to ExQ2

B2: Applicant's Response to Deadline 4 Submissions

B3: Tranquillity Assessment – Effects of Construction Traffic on the Cotswolds National Landscape

B4: Applicant's Response to Landscape and Visual Matters in SLD ISH2 Post-hearing Summary

B5: Mitigation Route Map

B6: Limestone Lowlands Character Assessment

C) Updated Documents Submitted at Deadline 5 (Applicant)

C1: Applicant SoCG with Wiltshire Council

D) Documents Submitted at Deadline 5 (Others)

D1: Natural England Response to ExQ2

D2: CNLB Responses to ExQ2

Introduction

1. Section A of this note sets out SLD's comments on landscape matters pertaining to the Change Application, and new and updated information submitted by the Applicant and others at Deadline 5.
2. For the avoidance of doubt, where no comments have been provided in respect of a document is not mentioned, SLD maintains its position.
3. Whilst the Applicant's new and updated information has clarified certain matters and raised a few additional queries, at this point SLD fully maintains the position of its landscape expert Ms Tinkler as set out in SLD's *Landscape and Visual Impact Report* (LVIR) [REP1-170].
4. Also, here, SLD would like to draw the ExA's attention to an action arising from Deadline 3 for the Applicant to produce new material which, as far as SLD can ascertain, has not yet been submitted. The action is in the Applicant's response to ExQ1 [REP3-128] LV1.13, which relates to the Applicant not having provided illustrations showing the changes in views that would be experienced by people travelling along PRowS crossing sites A – E in fields where solar arrays are proposed.
5. The ExA asked the Applicant to provide representative photomontages and typical sections showing the view from a PRow 1) crossing a field with Solar PV panels either side, and 2) with Solar PV panels to one side. The Applicant agreed to do this "at a future date". Clarification as to whether this material has been provided would be helpful (if not submitted at Deadline 6), and if not, when it would be provided (ideally, before ISH5).

A) Change Application

6. [REP3-134] is the Applicant's *Change Notification June 2026 Revision 1*. These comments have also been informed by the other Change Application and Application documents including [CR1-045] *Change Application and Consultation Report*; [CR1-046] *Supporting Environmental Information Report (Change Application)*; [CR1-035] *Assessment of Effects on the CNL and its Special Qualities (Change Application) (Rev 1)* (Tracked); and [REP2-012] ES Volume 2 Figure 8-14 Baseline Photography and Photomontages - Viewpoint 45- CNL G (Part 3) (Rev 3).
7. The only proposed change in the Change Application that is considered to be of more than relatively minor relevance to landscape and visual matters is Change 4: Removal of Solar PV Infrastructure from Lime Down C.

Change 4: Removal of Solar PV Infrastructure from Lime Down C

8. To help reduce high levels of adverse visual effects, the Applicant now proposes to remove solar arrays and infrastructure from the whole of Field C9, which is arable land lying east of Alderton Road and south of the railway, with existing woodland (Broadmead Covert) to the northeast. The CNL boundary runs along Alderton Road.
9. Ms Tinkler **agrees** with the Applicant that the removal of solar arrays / infrastructure from Field C9 would help to reduce levels of adverse visual effects in views towards Field C9 from Alderton Road, and that the effects would no longer be 'significant'.
10. However, in Ms Tinkler's opinion, the reduction in the levels of adverse visual effects would not be as great as the study has assumed.
11. The proposal includes the establishment of 'low density scrub' in the field, with the objective of 'rewilding' the area as an ecological habitat and improving ecological connectivity.

12. The introduction of ecological restoration or rewilding measures within the receiving landscape is very likely to result in localised adverse landscape and visual effects which would increase in level as the proposed planting matures, due to the contrast between the existing orderly agricultural baseline character, as identified in, and typical of, the published character assessments, and dynamic, unmanaged vegetation, which is not characteristic in these landscapes. It is not clear whether the Applicant's study has factored in this negative effect. Clarification would be helpful.

B) New Documents Submitted at D5 (Applicant)

B1 [REP5-097] *Applicant's Response to ExQ2*

LV2.1 *Time Limited Enhancements*

13. This question is to the Applicant, Wiltshire Council, Natural England, and the CNLB. It relates to the proposed enhancement measures through which the Applicant seeks to further the purpose of the CNL.
14. Ms Tinkler commented on the question at Deadline 5, in Section B of SLD's *Landscape Responses to Deadline 4 Documents and ExQ2* (Appendix A to [REP5-130]).
15. For ease of reference and comparison, SLD's comments on all the parties' Deadline 5 responses to this question are in this section.
16. **Part 1)** of the question asks the Applicant whether the proposed wildflower meadows and verges (which are enhancement measures) are "*time limited and removed at decommissioning*". The Applicant explains that the continuation of the enhancements "*are dependent upon the continuation of the development*" and "*would be removed at decommissioning*", although it is noted that the Applicant "*cannot control what is done with these elements on decommissioning and return of the land to the original landowner*". It is acknowledged that, in principle, it would be open for the landowner to retain them.
17. Clarity is sought from the Applicant as to whether they have therefore conducted the assessment on the basis that the wildflower meadow and verges would be removed, as SLD understands. Generally, greater clarity would be welcome in respect of what assumptions have been made on decommissioning for the purpose of assessing the reasonable worst-case scenario. SLD notes that, as above, some elements may be an ecological 'enhancement' for the scheme, while also causing adverse effects in the landscape terms.
18. Re **Part 2)**, all the parties including SLD **agree** that "*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...*".
19. However, both SLD and Wiltshire Council emphasise that the enhancement / benefit is very small compared to the significant amount of harm that would be caused by the Scheme overall.
20. Re **Part 3)**, the question is, "*If enhancements are removed at decommissioning, would that then be considered a harm to the purposes of the Cotswolds National Landscape at decommissioning?*".
21. The CNLB says **yes**. The Applicant and SLD say **no**. Natural England and Wiltshire Council say the answer could be **yes or no**, depending on whether the effects of the proposed enhancement measures are measured against the **existing** baseline situation, or the **future pre-decommissioning** baseline.

22. Natural England and Wiltshire Council say **no** if measured against the **existing** baseline, and **yes** if measured against the **future** baseline.
23. Ms Tinkler's understanding is that for DCOs / NSIPs, the measurement should be based on the **existing** baseline situation.
24. SLD's **no** answer was based on that assumption, and it appears that the Applicant's **no** answer is also based on the same assumption. It is not clear whether the CNLB's **yes** answer assumed existing or future baseline: clarification of this point may be helpful.
25. In summary, in Ms Tinkler's opinion, if the measurement should be based on the **existing** baseline situation, then if the enhancements were removed at decommissioning, this would **not** be a harm to the CNL's purposes at decommissioning because the removal would be the cessation of a time-limited benefit, not the introduction of a new adverse effect.
26. However, if it should be the **future** baseline, then there **would** be harm to the CNL's purposes at decommissioning, for the reasons outlined in Natural England's and Wiltshire Council's responses. However, in that case, presumably the amount of harm would be very small compared to the very large amount of benefit caused by the removal of the whole Scheme.

LV2.5 – Setting of the Cotswolds National Landscape

27. This question is to Natural England, asking if it agrees with the Applicant's response to ExQ1 LV1.9 [REP3-128] which sets out the Applicant's conclusions about the spatial extent of the CNL's setting.
28. SLD's comments on Natural England's response to this question are set out in Section D1 below.
29. The Applicant's comment on this question states that *"The Applicant considers the setting of the CNL to extend across parts of Lime Down A, B and C, but not across the entirety of the three sites. The Applicants position is that **the setting for the CNL extends as far as to where development or land management proposals, can be considered to have an impact upon the CNL**"* (emphasis added).
30. This comment appears to confirm that the Applicant's criteria for establishing the spatial extent of the CNL's setting align with those of the CNL and other National Landscape teams, with which Ms Tinkler **agrees**, with the first step in the assessment process being to establish the extent of the setting by identifying areas where there would be an indirect effect on the CNL, followed by the assessment of the levels of any such effects.
31. As well as Ms Tinkler, it appears that other parties had assumed the Applicant's Landscape and Visual Impact Assessment (LVIA) [REP3-025] was correct in finding no intervisibility / interinfluence / association between Lime Down D and E and the CNL. Therefore, no indirect effects on the CNL would arise from sites Lime Down D and E, and therefore, Lime Down D and E are not within the CNL's setting. However, the parties do **not agree** with the LVIA's conclusion that the indirect effects, and therefore the setting, would be restricted to relatively small parts of A, B and C.
32. However, as explained further in comments on Natural England's response below, at Deadline 4, the Applicant submitted 'augmented' Zone of Theoretical Visibility (ZTV plans) [REP4-085], as requested at ISH2, to check the extent of the intervisibility of the individual sites with the CNL which is difficult to establish through fieldwork, especially Lime Down D and E which are furthest from the CNL boundary.
33. The ZTV plans show potential intervisibility between the CNL and Lime Down D and E, Lime Down E being the easternmost part of the Scheme. Therefore, as explained in SLD's *Deadline 5 Submission* [REP5-130], Appendix A, Section A, 1c) *Written Summary of Applicant's Oral*

Submissions and Responses at ISH2 [REP4-085], Lime Down D and E must be within the CNL's setting.

34. However, also as explained in [REP5-130], the main focus of EIA / LVIA is on 'significant' effects. In relation to the CNL's setting, the parties appear to **agree** these would occur west of the Fosse Way, so that is where attention is focussed (notwithstanding a wider setting might possibly be inferred from the new ZTV plans).

LV2.6 – Effects to the Cotswolds National Landscape and its Special Qualities

35. This question is to Natural England, asking 1) whether it agrees with the CNLB's position or the Applicant's position on the CNL's Special Qualities, and 2) if it considers that the Applicant has demonstrated that there would not be cumulative effects on the CNL that would increase effects identified when considering the project alone.
36. SLD's comments on Natural England's response regarding Part 1) (CNL Special Qualities) are set out in Section D1 below.
37. The Applicant's comments on Part 1) of the question include the following statement:
- "[T]he landscape and visual effects of the Scheme on the CNL and its Special Qualities have been mitigated throughout the landscape led, iterative design process and has been informed by the Cotswold Nature Recovery Plan in conjunction with liaison with the project Ecologist and consultation with officers at the CNL and WC. The Scheme has avoided harm to the CNL, maintained views to and from the CNL, protected the features of the landscape within the setting of the CNL, retained and enhanced the character of the landscape through the proposed embedded mitigation and provided positive enhancements to further the purpose of the CNL."*
38. Ms Tinkler does **not agree** with many of the assertions made in the above statement:
- i) Very few of the landscape and visual effects of the Scheme on the CNL and its Special Qualities have been mitigated, and many cannot be mitigated, and would remain 'significant' for the duration of the operation.
 - ii) The Scheme has **not** avoided harm to the CNL: the LVIA concludes that receptors within the CNL would experience 'significant' adverse effects, and in SLD's experts' opinions, there are likely to be direct effects on the CNL along the proposed construction route.
 - iii) The Scheme could maintain some views to and from the CNL, but certainly not all, and many visual receptors would experience 'significant' adverse effects.
 - iv) The Scheme would protect certain existing landscape 'features' within the setting of the CNL such as hedges, woodland, grassland and watercourses; however, it would also result in 'significant' adverse effects on other 'features' which are aspects of 'landscape' as shown in *Figure 1: What is Landscape?* in Natural England's 2014 publication *An Approach to Landscape Character Assessment*, including aesthetic and perceptual qualities, and 'significant' adverse effects on the overall character of the landscape, where rural agricultural 'features' are replaced by industrialised 'features'.
 - v) The overall character of the existing landscape is neither retained nor enhanced.
 - vi) The proposed landscape / visual mitigation measures would not deliver landscape / visual enhancement, as they cannot be double counted (see SLD's previous submissions, and following sections).
 - vii) The LVIA acknowledges that the proposed embedded mitigation would result in adverse landscape and visual effects.

- viii) During the operational phase, the measures which are definitely enhancement and not mitigation and which are intended to help further the purposes of the CNL would fulfil the objective; however, the enhancement / benefit is very small compared to the significant amount of harm that would be caused by the Scheme overall.
- 39. In the response to Part 2) of the question, the Applicant states that *"It was agreed [with Natural England] that there are **no cumulative effects on the CNL itself**, noting that the Lime Down Scheme is not within the CNL"* (emphasis added).
- 40. Natural England's response to the question states that it *"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"*.
- 41. Ms Tinkler **agrees** that there would not be any **direct** adverse cumulative effects on the CNL itself (although there is the potential for direct adverse cumulative effects to arise along construction routes through the CNL, as explained in previous submissions by various parties including the CNLB and SLD).
- 42. However, Ms Tinkler does **not agree** that there would be no **indirect** cumulative effects on the CNL itself. In fact, the LVIA concludes that both on its own and in combination with the other identified projects, the Scheme would result in **'significant'** adverse indirect effects on the CNL (see for example Table 8-32: *Assessment of Cumulative Scheme Effects*).

LV2.7 – Linear Tree Planting in the Setting of the Cotswolds National Landscape

- 43. This question asks the Applicant whether the proposed linear tree planting in hedges along the lanes which form the boundary of the CNL in the area would *"preserve the character of the setting of the National Landscape"*, given that during operation, hedges in these locations would be kept low in order to maintain the characteristic and important open views towards and from the CNL, which are experienced by many High sensitivity receptors, whereas trees could screen the views.
- 44. The Applicant's response states that the aim is *"to promote standard hedgerow trees at an average density of at least one tree every 20 m to allow for irregular spacing which complements the existing landscape character. The presence of trees at this density is not expected to compromise the open views along the boundaries of C1, C6 and C8 and will support the landscape character of their setting"*.
- 45. The response also states that *"The Outline LEMP does not specify the density required for Linear Tree Planting alongside existing hedgerows, allowing this to be determined within detailed design (subject to consent) and in consultation with the CNLB and WC"*.
- 46. Firstly, regarding the spacing between new trees proposed to be planted within hedgerows, the Applicant's assertion that the Outline LEMP [REP5-080] does not specify the density required for linear tree planting in hedgerows is **incorrect**.
- 47. Under the heading *Hedgerow Tree Planting*, para. 1.3.36 of the Outline LEMP states, *"All newly planted hedgerows will include Select Standard trees randomly spaced between **5–9 m** centres. On occasions where visual receptors are likely to see visual effects in close proximity, denser tree planting of between **2–3 m** centres may be adopted to provide more instant screening effects"* (emphasis added).
- 48. This contradicts the proposal for 20m centres stated in the response. It would be helpful if the Applicant could clarify which is correct.
- 49. Secondly, Ms Tinkler does **not agree** that the proposed linear tree planting in hedges *"complements the existing landscape character"*, nor that it would *"support the landscape character of their setting"*. Escaped roadside hedgerow trees are **not** characteristic along this section of the

CNL boundary, which here runs from Sherston (along Church Road) to the Fosse Way, passing east of Alderton which lies just west of Lime Down C and Fields C1, C6, and C8.

50. In fact, escaped hedgerow trees in field boundaries are not characteristic in the whole area between the lane and the Fosse Way, as can be seen while travelling through the area (and on Google Earth).
51. The images below, which are snipped from Streetview (© Google, various dates), show the open views which are experienced from the lanes.

Looking east and south from Church Road towards Lime Down C (lying east of Alderton Road)



52. The above image shows mature roadside hedgerow trees (on the skyline) along Alderton Road along the western boundary of Lime Down C (Fields C1, C6, and C8), from its junction with Church Road to the lane leading west to Alderton village. This section of the lane is c. 0.5km long, and it contains just **three** mature roadside hedgerow trees.

Looking north along Alderton Road, north of Alderton, adjacent to Lime Down C (right-hand side of image)



Looking north west along Alderton Road, south of Alderton, adjacent Lime Down C (right-hand side of image)



53. In the above image, the distance between the mature roadside hedgerow trees on the west side of the lane (left-hand side of image), is c. **150m**.
54. Because linear tree planting in hedges along / in the vicinity of the boundary of this part of the CNL is uncharacteristic, let alone at such close spacing, the proposal would certainly **not** "preserve the character of the setting of the National Landscape".
55. Furthermore, the trees would only be planted in the hedges on the east side of the lane (for a total distance of at least c. 800m). Even if the spacing was greater than the 20m stated in the Applicant's response to the question, this would still appear discordant in these open views, in

particular when approaching maturity: at 20m spacings, the tree canopies of large species such as lime and oak would eventually merge, effectively forming a very long, tall 'wall' when in full leaf.

56. Thirdly, regarding the *open views along the boundaries of C1, C6 and C8*, the reason why views across these fields are currently open is because the existing roadside trees are few and far between.
57. The presence of roadside hedgerow trees at up to 20m spacing would **certainly** compromise the existing open views towards and from the CNL. But even with greater spacing, many views would be compromised because along linear routes, from certain angles, when the trees are in full leaf, even if the canopy edges are far apart, they appear to close / coalesce, so the screening effect is perceived as being greater than it actually is.
58. Another concern is the Applicant's proposal to plant 'select standard' trees, as mentioned above with reference to the Outline LEMP. These relatively large specimens are usually specified when 'rapid' growth eg for screening purposes is required. In practice, smaller specimens (whips and feathers) tend to establish more successfully and catch up quickly, often becoming healthier plants. They also require less after-care, including less watering.
59. According to UK suppliers of 'select standard' trees, and forestry management guidance (see for example Gov.UK Forestry Commission Blog 19th May 2025 *How to help young trees survive prolonged hot dry weather*), for at least three years after planting, during extended periods of dry weather, the new trees should be watered every other day (a minimum of two or three times a week), each tree being supplied with 20 - 30 litres of water at each session. Ideally, the watering should be carried out in early morning or late evening.
60. However, that advice does not account for the extreme heat and long periods of drought experienced in the last two years, which may occur more frequently in future. It is not clear how the Applicant intends to address watering under such circumstances, in terms of source, availability, and capacity of the water supply, and frequency of monitoring (which should include checking weather forecasts to ensure contractors will water before the soil becomes too dry).
61. If newly-planted trees and shrubs do not establish successfully and have to be replaced – which could potentially be more than once during the Scheme's 60-year operational period – there would be consequences for the LVIA's assumptions about the length of time it would take for plants to grow tall enough to screen views. Levels of adverse effects could remain at high levels for longer than predicted.
62. If it was concluded and agreed that roadside hedgerow trees were not appropriate in this location due to being uncharacteristic in the landscape, and should be removed from the Scheme, there may be consequences for the LVIA's assumptions about the beneficial effects on / arising from new landscape 'fabric'. However, conclusions would presumably not change in respect of levels of adverse effects on overall character, since the LVIA does not consider that the linear tree planting would result in adverse landscape effects.
63. Regarding the consequences for visual effects, the Applicant does not consider that the linear tree planting along Alderton Road would result in the loss of characteristically open views towards / from the CNL. However, conversely, the LVIA also proposes and relies on this planting as a mitigation measure which is "*intended to strengthen existing hedgerows and reinforce field boundaries*" in order to screen views of Lime Down C from the west.
64. If it was concluded and agreed that roadside hedgerow trees were not appropriate in this location because they would screen characteristically open views, and should be removed from the Scheme, the LVIA should reassess visual effects accordingly, factoring in both a) the resultant reduction in levels of adverse visual effects arising from the total / partial loss of a previously-

open view (if that was assumed in the LVIA), and b) the resultant reduction in levels of adverse visual effects arising from the increase in visibility of the array / infrastructure areas.

65. Note that although Fields C1, C6, C8, and C9 (the latter subject to the outcome of the Change Application) which border the east side of Alderton Road would not contain arrays / infrastructure, there would be arrays / infrastructure in Field C7, which is only c. 115m north of the lane at its closest point, and c. 550m east of Grade II* listed St. Giles Church to the west, in Alderton.

B2 [REP5-098] Applicant's Response to Deadline 4 Submissions

4.5 Stop Lime Down – Comments on Deadline 3 Submissions

Table 4-5: SLD1-001 re Landscape and Visual - Mitigation

66. The Applicant's response states that "**some mitigation** of visual effects **includes landscape enhancements**, for example: strengthening existing landscape fabric components i.e. native field boundary hedgerows and planting new hedgerow trees, woodland, riparian corridor planting etc." (emphasis added).
67. Regardless of whether the measures are intended to mitigate landscape **or** visual effects, or both, landscape / visual mitigation cannot be double counted as landscape / visual enhancement (see GLVIA3 para. 3.39: the matter, and the implications, are explained further in Section 7.2 of SLD's LVIR [REP1-170]).

B3 [REP5-099] Tranquillity Assessment Effects of Construction Traffic on CNL

68. The Applicant's Tranquillity Assessment scope is primarily focussed on the effects of noise.
69. Para. 2.2.7 explains that this approach is due to the "*focus of policy CE5 on noise as an impact upon tranquillity [therefore] this report considers the most appropriate way to assess the effect of the Scheme on tranquillity within the CNL from a noise perspective*".
70. Ms Tinkler does **not agree** that the focus on noise is appropriate for the purpose of this exercise.
71. Para. 2.2.8 goes on to say that "*professional judgement associated with aural, visual and experiential aspects of the CNL considered during a site visit is also a key consideration. In consultation with Wiltshire Council's Landscape Officer aspects such as sound environment modelling, viewshed analysis, distance decay modelling and dark sky mapping were discussed to be included in supporting information and to inform the site visit*".
72. However, under the heading *Negative Visual / Experiential / Perceptual*, para. 2.3.6 only includes visual experiences, not non-visual or non-aural experiences, nor other relevant factors.
73. Broadly, Ms Tinkler **agrees** with the definition of 'tranquillity' set out in the CNL Tranquillity Statement and referenced in the Applicant's report, which is "*a state of calm and quietude associated with peace, experienced in places with mainly natural features and / or historic character, free from man-made noise and other aural and visual disturbance*". However, there is more to 'tranquillity' than this definition implies, which is important and relevant to the scope of assessments such as this.
74. Please refer to SLD's LVIR [REP1-170] for further information, but firstly and most importantly, **'tranquillity' is not synonymous with 'lack of sound'**.
75. The glossary of GLVIA3 describes 'tranquillity as **'a significant asset of landscape'**.

76. The Landscape Institute's Technical Information Note (TIN) 01/2017 on the subject explains that *"tranquillity cannot readily be defined as an environmental characteristic or quality as it is a state of mind that is being described and thus human perceptions as well as factual evidence must be considered in any studies relating to the term. Tranquillity is, in effect, **an umbrella term used to refer to the effect of a range of environmental factors on our senses and our perception of a place**" (emphasis added).*
77. In Wales, the definition of tranquillity that has been adopted by both Welsh Government (Welsh Government 2012) and Natural Resources Wales (NRW 2016a) includes *"feeling safe"*.
78. The above factors, especially safety, and contributions to landscape value, are fundamental to a full understanding of effects on tranquillity.
79. In Ms Tinkler's opinion, where relevant to landscape and visual effects, the Tranquillity Assessment's conclusions cannot be relied upon because these critical factors have not been considered. Ideally, the Assessment should be revised to address these matters.
80. Section 3 of the Tranquillity Assessment deals with *Transport Effects*. These matters will be commented upon by SLD's highways expert.
81. At para. 9.1.3, the Tranquillity Assessment concludes that *"The impact of the construction route on tranquillity within the CNL and its setting would be minimal creating aural and visual impact upon a focused section of the route principally affecting rural roads between the site access at Site A and the junction of Alderton Road/Church Road"*.
82. Ms Tinkler does **not agree** that effects on the CNL and its setting would be "minimal".
83. A detailed assessment of landscape and visual effects arising along the proposed construction routes, both within the CNL and its setting, is provided in Section 8.6 of SLD's LVIR [REP1-170].
84. Ms Tinkler's conclusion remains that construction traffic is highly likely to result in significant direct and indirect adverse effects on various aspects of character, and visual and other amenity, and safety, within the CNL and its setting.
85. Note that whilst the magnitudes of effects of the construction works may be assessed on the basis of them being 'short-term', many of the adverse effects would be significant throughout the duration of the works. Also it must be borne in mind that some effects could be permanent, for example damage to / loss of irreplaceable features / habitats along the route.

B4 [REP5-101] Applicant's Response SLD Landscape ISH2 Post-Hearing

86. This document sets out *"responses to the matters raised within Section 2.2 ISH2 – Landscape and Visual Impact and Section 3 Comments on Deadline 3 Submissions as well as commentary to SLDs responses to ExA First Written Questions LV1.6, LV1.7 and LV1.12"*.

Section 2.2: Definition and Assessment of Landscape Fabric and Landscape Character

87. This section explains why and how the Applicant arrived at the conclusion that it is acceptable to double count landscape / visual mitigation as landscape / visual enhancement.
88. SLD's *Deadline 5 Submission* [REP5-130], Appendix A, Section A, 1b) *Applicant's Response to Other Parties' Responses to ExQ1* [REP4-081] explains why Ms Tinkler fundamentally **disagrees** with the Applicant's approach – which the Applicant acknowledges is a departure from published guidance with the sole purpose of deriving benefit from acknowledged harm – and should be referred to for further information.

B5 [REP5-102] Mitigation Route Map

89. This document has been prepared in response to ExQ GCT1.6, which asks the Applicant to provide *"a single document containing a mitigation route map of the controls and mitigation measures that have been identified across a number of documents..."*.
90. The document is helpful; however, despite its purpose being to identify **mitigation** measures, a) certain items are included as **enhancements**, and b) it has previously been agreed that some of the enhancements are mitigating measures.
91. For example, on page 30, the objective of the proposal to maintain hedgerows at their current height of c. 1.5m bordering the CNL is described as being *"To avoid and reduce impacts and effects on the CNL"*, ie mitigation, but is called *"Enhancement"*.
92. Also, on page 31, the objective of the proposal to retain *"The reinforced [operational] landscape [‘fabric’]"* post-commissioning is *"To reduce the long term visual effect and impact of the Scheme"*, and this is described as *"Enhancement"*.
93. Regarding the latter, as explained in previous submissions and summarised above, firstly, whether post-decommissioning effects can be described as so-called ‘legacy landscape’ benefits depends on whether the operational mitigation and enhancement ‘fabric’ planting measures are retained and, if retained, whether they would continue to give rise to the acknowledged adverse landscape and visual effects that would arise during operation.
94. Secondly, currently, none of the post-decommissioning proposals are secured or controlled under the draft DCO. In summary, the current Outline Decommissioning Strategy (Rev 4) **[REP5-075]** provides for the removal of all infrastructure and other ‘hard’ / man-made Scheme elements from the fields, and an assessment to be undertaken in respect of whether hedgerows should be removed, having regard to best ecological and land management practices. However, the Strategy does not address the removal of the ‘soft’ / natural ‘fabric’ mitigation / enhancement measures, such as trees, hedges, and species-rich meadows.

B6 [REP5-103] Limestone Lowlands Character Assessment

95. This document comprises the Applicant’s assessment of effects on Landscape Types and Character Areas, undertaken following Action Point 14 and 15 from ISH2 **[EV8-010]**, specifically, (AP14) effects on the Limestone Lowland landscape type and its sub-divided Landscape Character Areas, and (AP15) cumulative effects assessment for Limestone Lowland and Hullavington Rolling Lowland, considering *"whether the key characteristics of the character types would be so changed by the cumulative developments as to transform it into a different landscape type"*.
96. The assessment’s conclusions about beneficial effects are based on the Applicant having erroneously double counted landscape / visual mitigation measures as landscape / visual enhancements (as explained in SLD’s previous submissions and above).
97. For example, in Table 1: *Effects on the Host LCA 8: Hullavington Rolling Lowland Character*, the row *Medium sized woodlands and deciduous copses* states that *"The substantial provision of new planting combined with the minimal losses to accommodate the Scheme are the driver behind the beneficial effects associated with the Landscape Fabric of the Scheme as assessed in the LVIA"*; however, this planting is a mitigation measure required to screen views. See also para. 1.6.10 item 4, which is called *"The benefits of mitigation"*.
98. Para. 1.6.3 confirms the LVIA’s conclusion (with which Ms Tinkler **agrees**) that there would be a *"significant level of effect within the 1km Study Area"* (both direct and indirect effects). Ms Tinkler **agrees** that the level of effect *"dissipates with distance"*.
99. Ms Tinkler **agrees** with the Applicant that this is a complex assessment with many different factors involved. That is mainly due to the very large size of the Scheme and the fact that it covers several

landscape areas and types, within which there is a wide variety of landscape characteristics, qualities, functions and other aspects. Some of the variations which occur are notable, but being localised, may not feature in published character assessments, most of which cover large geographical areas. The assessment is further complicated by there being different published character assessments which cover different parts of the study area but overlap, with the approach and relevant factors in each being slightly different.

100. In this regard, broadly, Ms Tinkler **agrees** with the assessment's adopted approach and method, albeit concerns previously expressed about certain aspects of both still apply, meaning that levels of effects may have been underestimated.
101. However, Ms Tinkler **agrees** that the development would result in significant direct effects on all the host character types and areas, and significant indirect effects on parts of them, extending at least 1km from the site but probably more.
102. Ms Tinkler also **agrees** that in terms of the effects on the types / areas when considered as a geographic whole, effects would not be 'significant' due to the relatively small percentage of the type / area being affected.
103. The same applies to cumulative effects on the types / areas, with significant direct effects arising from the identified developments on the host character types and areas, and significant indirect effects on parts of them, but if each type / area is considered as a geographic whole, cumulative effects would not be 'significant'.
104. However, it must be noted that within the host Hullavington Rolling Lowland and Malmesbury – Corsham Limestone Lowlands character areas, which are relatively large, in combination with Lime Down there would be a high number of large scale, industrialising developments throughout the area which may not change the overall key characteristics to the point where the area tips from being 'a rural area containing large-scale, industrialising development' to one which has an 'industrialised character', but would nonetheless fundamentally change the ways in which the whole area is experienced.

C) Updated Documents Submitted at D5 (Applicant)

C1 [REP5-088] **Applicant SoCG with Wiltshire Council (Rev 3) (Tracked)**

3.4.22 Protected / valued landscape status

105. This matter is currently **Agreed** between the two parties.
106. The Applicant's response states, "*The applicant agrees that Lime Down Sites A, B and C are within the setting of CNL and have a higher value than Lime Down Sites D and E*".
107. The Applicant's response goes on to say that "*In ES Volume 1, Chapter 8: Landscape and Visual [REP3-025] the CNL, as a designated landscape is assessed as High Value and High Sensitivity. Lime Down Sites A, B and C within the 1 km and 2km Study Areas which are within the setting of the CNL are assessed as **High to Medium Value** and High to Medium Sensitivity*" (emphasis added).
108. Firstly, note that in [REP3-045] Appendix 8-3-2-2: *Landscape and Visual Assessment Sheets (Significant)* (Tracked), Lime Down Sites A, B and C are reported as being of **High** value, not **High to Medium**. It would be helpful if the Applicant could clarify which is correct.
109. Secondly, the Applicant has confirmed that only 'parts' of Lime Down A B and C are within the setting of the CNL. However, the LVIA does not differentiate between the levels of value and sensitivity of the parts of Lime Down A, B and C which are within the CNL's setting, and those

which are not. Therefore, in Ms Tinkler's opinion (and notwithstanding the differences of opinion about the extent of the setting, as explained in SLD's responses), it would be helpful if the LVIA was revised to factor in the differences in levels of value.

D) Documents Submitted at D5 (Others)

D1 [REP5-140] *Natural England Response to ExQ2*

LV2.1 *Time Limited Enhancements*

110. Comments on Natural England's response to LV2.1 are in Section B1 *Applicant's Response to the Examining Authority's Second Written Questions* above.

LV2.2 – *Furthering the Purposes of the Cotswolds National Landscape*

111. This question is to Natural England, asking whether they consider that the proposed development demonstrates that enough has been done to fulfil the duty to seek to further the purpose of the CNL.
112. *"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"* (emphasis added).
113. As explained above, the Applicant has stated that it must be assumed that the operational enhancements would **not** be retained following decommissioning, because *"The Applicant cannot control what is done with these elements on decommissioning"* ([REP5-097] Applicant's response to ExQ LV2.1).

LV2.5 – *Setting of the Cotswolds National Landscape*

114. This question is to Natural England, asking if it agrees with the Applicant's response to ExQ1 LV1.9 [REP3-128] which includes a plan showing what the Applicant considers to be the spatial extent of the area that it considers forms the CNL's setting. If it does not agree, Natural England is asked to define the spatial extent of the area that it considers forms the CNL's setting.
115. *"Natural England does not agree with the applicant's definition of the setting of the Cotswolds National Landscape in spatial terms".*
116. Natural England's response is helpful, as it clarifies the spatial extent of the CNL's setting, and how it is determined (this being the subject of ExQ1 LV1.9).
117. This matter is explained in more detail in SLD's *Deadline 5 Submission* [REP5-130] Appendix A, Section A, 1c) *Written Summary of Applicant's Oral Submissions and Responses at ISH2* [REP4-085].
118. In summary, the definition of setting provided by the CNLB is the correct starting point for effects assessments, ie it is *"the area within which development and land management proposals, by virtue of their nature, size, scale, siting, materials or design can be considered to have an impact, positive or negative, on the landscape, scenic beauty and special qualities of the Cotswolds AONB."*

119. At this stage, the **levels** of the effects are irrelevant: they are assessed once the setting's full extent is established.
120. Note that Natural England's response states that *"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"*.
121. Para. 2.1.21 of Ms Tinkler's response to LV1.9, in SLD's **[REP3-173]** also asked the Applicant to explain the criteria which were used for this exercise – they appeared to be based on areas within which landscape and visual receptors within the CNL would experience the highest levels of indirect effects.
122. However, in their responses to this question in **[REP5-097]**, the Applicant has now confirmed that the CNLB's definition is agreed and accepted, stating *"The Applicants position is that the setting for the CNL extends as far as to where development or land management proposals, can be considered to have an impact upon the CNL"*.
123. Until the Applicant's new 'augmented' ZTV plans **[REP4-085]** were provided, as well as Ms Tinkler it appears that other parties had assumed the LVIA was correct in finding no intervisibility / interinfluence between Lime Down D and E and the CNL. Therefore, no indirect effects on the CNL would arise from sites Lime Down D and E, and therefore, Lime Down D and E are not within the CNL's setting.
124. Regarding **intervisibility**, Natural England's response states that *"All parts of the development that would be visible from the CNL should be included in the setting"*.
125. The ZTV plans show that in fact, there **is** the potential for intervisibility between the CNL and the part of the Scheme furthest from the CNL, ie the eastern end of Lime Down E, at Seagry Wood.
126. Natural England says that *"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 ZTV plans show that there are areas several kilometres beyond Lime Down E where visual receptors could potentially see the CNL with not just Lime Down E in the view, but the rest of the Lime Down sites, extending westwards / northwards.
127. In addition, Natural England explains that even in areas lying between the CNL and viewpoints with intervisibility within which there is no intervisibility, *"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"*.
128. Regarding **interinfluence** (which requires consideration of both the visual and non-visual aspects of character), with reference to the Government's Natural Environment PPG, Natural England concludes that *"the landscape character within the CNL and adjoining the CNL is complementary"*, and that *"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"*.
129. Natural England's response also identifies other aspects of 'landscape' and potential effects upon them which are a factor in determining the spatial extent of setting, ie tranquillity, dark night-time skies, and ecological connectivity, all of which could extend the setting even further than assumed.
130. Another factor is the effects of glint and glare, which can extend for many kilometres. As stated in previous responses, in SLD's glint and glare expert's opinion, the Applicant's method is flawed, and levels of effects are likely to be higher / effects would extend further than assumed.

131. In addition, Natural England states, "*it may be appropriate to definite [sic] 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*". Ms Tinkler **agrees** with this recommendation.
132. However, as mentioned previously, notwithstanding the above, and as explained in [REP5-130] (Appendix A, Section A, 1c) *Written Summary of Applicant's Oral Submissions and Responses at ISH2*), in EIA / LVIA, the emphasis is on the receptors who / which would experience 'significant' effects (although consideration must also be given to effects which in themselves are not 'significant', but when combined, would become 'significant').
133. In terms of the CNL's setting, the parties appear to agree that 'significant' indirect landscape, and visual effects would occur west of the Fosse Way, so that is where attention has been focussed (notwithstanding a wider setting may be inferred from the new ZTV plans). However, the parties do not agree about the **levels** of effects west of the Fosse Way.

LV2.6 – Effects to the Cotswolds National Landscape and its Special Qualities

134. Natural England highlights concerns about the 'significant' effects of construction traffic travelling through the CNL during construction and decommissioning, especially on the CNL's Special Quality 9, tranquillity.
135. However, "*Based on the applicant's assessment... Natural England consider that the scheme is unlikely to result in significant adverse impacts on the remaining special qualities*".
136. Ms Tinkler **agrees** that the Scheme is unlikely to result in significant adverse impacts on the remaining Special Qualities.

D2 [REP5-128] CNLB Responses to ExQ2

LV2.1 Time Limited Enhancements

137. Comments on the CNLB's response to LV2.1 are in Section B1 *Applicant's Response to the Examining Authority's Second Written Questions* above.

LV2.4 Matters Raised at ISH2

138. Under the heading ExQ2 LV2.4: *Matters Raised at Issue Specific Hearing 2*, the CNLB is asked to confirm if there is agreement with the Applicant in relation to three matters:

1) Extent of CNL setting

139. The CNLB is asked to confirm if there is agreement with the applicant in relation to: 1) "*The extent of the setting of the CNL as set out in the applicant's response to ExQ1 LV1.9 [REP3-128] (Annex E)*".
140. Previously, the CNLB had assumed that the LVIA had concluded that the whole of sites Lime Down A, B and C are within the setting of the CNL; however, the LVIA is ambiguous, and elsewhere states that only 'parts' of Lime Down A, B and C are within the setting.
141. The Applicant has now confirmed that only 'parts' of Lime Down A, B and C are within the setting. The area covered is less than had been assumed.

142. *"The Board does not agree with the applicant's assessment and considers the setting of the CNL to be more extensive than that showed in the Annex E plan."*
143. Ms Tinkler **agrees** that the setting of the CNL is more extensive than that showed in the Annex E plan, and also, with the CNLB's comment that *"intervisibility is one aspect of setting"*, the other being interinfluence / association in terms of nature, culture, function and other factors. This applies to LVIA and heritage assets: see for example Historic England's publication *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3* (Second Edition), page 2, 5th para. of *Part 1: Settings and Views*.
144. The extent of the CNL's setting is discussed in more detail above, in comments on LV2.5 – *Setting of the Cotswolds National Landscape*.

2) Removal of panels from Lime Down A

145. *"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".*
146. SLD **agrees** that panels within the southern part of Field A1 should be removed from the scheme.

3) Effects on dark night skies

147. SLD **agrees** that so long as controlled through a detailed OEMP, the proposed temporary and security lighting is *"unlikely to have a significant adverse effect on the CNL's dark skies"*, and that *"The construction environmental management plan must be substantially in accordance with the outline construction environmental management plan"*.

APPENDIX B

CLIMATE RESPONSE



University of Derby's (UoD) response to REP5-023 and REP5-108 of 18th August 2026

Introduction

1.1 Background

This report concerns our response to the Applicant's two recent documents:

- **[REP5-108]:** The Applicant's Climate Change Response to Stop Lime Down Appendix D: University of Derby's response to [REP3-132] – dated August 2026
- **[REP5-023]:** The Applicant's updated Environmental Statement Volume 1 Chapter 7: Climate Change Revision 2 – dated August 2026 (draft version)

The updated Environmental Statement **[REP5-023]** represents a considerable update of their original statement **[APP-059]** in which various factors have been addressed, including: updated Greenhouse gas (GHG) emissions, PV panel number increase resulting in updated energy outputs, PV panel emissions are now addressed using an Environmental Product Declaration (EPD) and comments that address UoD's (and ExQ2's) questioning of how emissions payback of the Scheme is accounted for.

Unfortunately, given the short timeline between Submissions 5 and 6, it will only be possible to comment on the updated ES **[REP5-023]** in superficial terms. There is insufficient time to feasibility-check the individual updated GHG calculations, so we have accepted these verbatim). In addition, **[REP5-108]** is also highly informed by the updated ES **[REP5-023]**.

The **ExQ2 (CC2.2)** had requested a number of issues to be addressed by the Applicant in light of comments made by the Universities of Exeter and Derby (UoE and UoD respectively) through their submissions by Wiltshire Council **[REP1-138]** and Stop Lime Down (SLD) **[REP1-182]** respectively. These were:

- Recommendation to use Environmental Product Declarations (EPD) to calculate GHG emissions and derive a carbon payback period.
- An estimate of payback from the Applicant.
- Response to queries raised re:
 - Increased GHG inventory.
 - Panel number increase in constrained land area.
 - Panel configuration.

2.1 UoDs response to REP5-108

The table below summarises UoDs comments according to the subsequent Applicant responses. As already indicated above, this document is informed by the updated ES [REP5-023].

Table 2.1: Responses to REP5-108

Section No	Summary of applicant Response (as given in REPs 5-108)	Comments from UoD in reply
Emissions calculations		
2.1.6	Updated GHG emissions: the Applicant does not consider that UoD's suggested increase in GHG inventory would make a significant change to the results presented in the updated ED [REP5-023]	UoD do not have sufficient time to review figures in updated ES but it appears that Applicant's GHG emissions are greater than UoD's suggested emissions, in any case. So these have been accepted verbatim in our calculations for net savings (section 3.0 of this report)
2.17-2.1.9	Updated ES [REP5-023] reflects updated energy output for fixed and tracker panels (560 and 442.3 GWh resp), updated degradation profile (1% in year 1, 0.35%) and increased fixed panel number to 842,000.	Comment noted and used in the UoD's estimate of Net Savings (section 3.0 of this report)
Energy Output		
3.1.1-3.1.6	These sections question UoD's modelling approach. UoD had also questioned apparent reversal of fixed and tracker energy outputs. This has been explained in updated ES [REP5-23] as it being possible to incorporate more fixed panels than trackers onto available site.	UoD note this point. Unfortunately, the UoD does not have sufficient time in advance of Deadline 6 to verify the energy outputs using updated 18° and 7.5m for this response, other than using Global Solar Atlas.
Payback year		
5.1.1-5.2.5	This section concerns discussion re: UoD's use of payback/break-even approach (where the Grid outperforms the Scheme after 2033	Whilst the UoD takes on a lot of these points and the situation is certainly "which came

	according to DESNZ, 2023), this is summarised as follows: • UoD’s payback analysis has different analytical purpose to comparison represented in ES and although UoD’s analysis provides context it does not detract from ultimate lifecycle emissions calculated for Scheme • The Applicant comments that without Schemes like this, the UK Grid will not de-carbonise. • The Scheme presents Net Savings within the lifetime of the Scheme. • The comparison of the Scheme with the UK Grid is not a “like-for-like basis” – the Scheme is based on global and lifetime GHG emissions, whereas the UK Grid is based on territorial and operational emissions. • The Scheme represents an emissions saving and supports trajectory to Net Zero (as Grid average during proposed development’s operation will include fossil fuels). • A comparison is made with three other solar farms (Peartree Hill, One Earth and Springwell) (using reference to the combined-cycle gas turbine (CCGT) power carbon intensity. A payback of less than 3 years is quoted for fixed and tracker panels)	first, chicken or egg” and without such Schemes, the UK Grid will not decarbonise, the UoD still has concerns in respect of the comparison of the Scheme with the first year of operation (2029) and how Net Savings are ultimately calculated. These concerns have been detailed in Section 3.0 of this report. Regarding the comparison with CCGT as baseline, would it be possible to include this comment and associated calculations behind it in the updated ES [REP5-023]?
Scenario testing		
8.1	The Applicant has updated their emissions figures in the updated ES [REP5-023]	Noted. UoD has accepted the updated emissions verbatim in their assessment of net savings (Section 3.0 of this report).

2.1 UoD comments on updated ES [REP5-023]

Section No	Summary of applicant Response (as given in REP5-023)	Comments from UoD in reply
7.1.1 to 7.10.14	Panel layouts and the associated energy output – this includes updated commentary on UoD’s enquiry over the	The comments have been noted.

	apparent reversal of fixed and tracker panel energy outputs and it is explained that more fixed panels can be fitted into the allocated space than tracker panels, hence the yield is higher	
7.10.3 to 7.10.82	GHG emissions: construction and operational emissions are updated significantly throughout the ES including Well-to-tank related emissions, the use of EPDs for panel emissions, mounting structures, electrical cables, BESS, shipping of materials, vehicle movements, waste, water usage and energy usage. Updated operational emissions include maintenance travel, replacement of Scheme components (BESS and panels), water consumption.	UoD have accepted these verbatim in their calculation of energy output/avoided emissions and net savings (in section 3 of this report) as there has not been sufficient time to investigate individual emissions further before Deadline 6. In any case, the emissions presented by the Applicant in the updated ES are less lenient than those presented by UoD in [REP1-182].
7.7.5, 7.10.6, 7.10.8 Also 7.10.88	Response to UoDs previous comments comparing Scheme vs. Grid performance using decarbonised Grid (as per DESNZ, 2023): - Recognises UK grid carbon intensity projected to decrease as additional low-carbon generation deployed. However, the purpose of the assessment is not to demonstrate that the Scheme will maintain lower carbon intensity than an evolving national grid throughout operational lifetime, rather, the assessment considers lifecycle GHGs associated with the Scheme and the contribution it makes through meeting national decarbonisation - Stresses comparison of Scheme's lifetime GHG intensity to projected Nat Grid intensity for 2029 (first year of operation to provide context regarding carbon performance of Scheme at point of electricity generation)	Whilst the UoD takes on a lot of these points, the UoD still have issues with the comparison of the Scheme with the first year of operation (2029) and how Net Savings are ultimately calculated. These have been detailed in a separate Section 3.0 as it warrants a separate discussion. If the Scheme is delayed for whatever reason, the comparative Grid intensity could dictate that the Scheme may slip into a deficit re: carbon emissions.

7.10.73	Accounting for the estimated construction phase and operation phase emissions, the Scheme's total carbon intensity value is 46.29 gCO ₂ e/kWh for tracker panels and 40.52 gCO ₂ e/kWh for fixed panels.	Possible correction: these values (46.29 and 40.52 gCO ₂ e/kW are lifetime values (construction plus operational values would be 40.08 and 45.35 gCO ₂ e/kWh and 40.08 for trackers and fixed respectively
7.10.88 - 7.10.95	Overall GHG Significance Effect: - The future baseline scenario, i.e. a scenario without the Scheme, is based on forecast UK grid average energy emissions from DESNZ for year 2029 (i.e. 48.9 gCO₂e.kWh). The operational energy intensity allows isolated comparison of the emissions associated with operation of the Scheme compared to the alternative in the year that electricity generation from the Scheme commences. Once in the operation/maintenance phase, the Scheme will achieve emissions reductions compared to a without-Scheme baseline. - The operational intensity of Scheme is projected to be 27.74 and 32.55 gCO₂e/kWh for fixed and tracker respectively. Comparative grid intensity is 48.9 gCO₂e/kWh. The Scheme will contribute to reducing average emissions from grid and the GHG emissions during construction/operation and decommissioning can be considered to be offset by the net positive impact of the Scheme on the UK's ability to meet its carbon targets - Table 7-28 (7.10.90) presents Lifetime GHG emissions from different technologies. The last entries incorporate the Scheme's updated intensity values, 27.72 and 52.55 gCO₂e (fixed and tracker respectively)	Net savings: These savings are achieved through the comparison of the Scheme's avoided emissions with incurred emissions, using the grid intensity value of 48.9 gCO₂e, as the comparator in the first year of the Scheme's operation 2029 (DESNZ, 2023). There is extensive commentary throughout the updated ED to make this clear. Whilst UoD accept it is a reasonable strategy, we comment that if a lower comparator is used i.e. somewhere between 45 and 48.9 gCO₂e/kWh, the Scheme could slip back into an emissions deficit – see Section 3.0 7.10.92 Table 7-28: These are Operational Intensities and should they read 40.52 and 46.29 gCO₂e instead (lifetime GHG)?

	7.10.92 presents the Net Savings as 266,507 and 65,916 tCO₂e (fixed and tracker respectively)	
7.12.5-7.12.8	Residual effects and conclusions: These sections represent new text that reiterate the Applicant's position on the Scheme's benefits. They comment that: - The Scheme does not directly remove GHGs from the atmosphere. Its climate benefit arises from generating electricity from a low-carbon source, thereby displacing electricity that would be supplied by the projected UK electricity grid. Therefore, it is appropriate to compare the lifecycle emissions of the Scheme with a scenario in which Scheme is not developed and where equivalent quantity of electricity is supplied by projected UK grid carbon intensity at time of first generation. - Compared with the projected grid in the no-project scenario, the Scheme is estimated to deliver a net savings of 266,507 tCO₂e over the assessment period. It should be recognised that this comparison is based on different accounting boundaries. Projected UK grid carbon intensity reflects territorial emissions associated with electricity generation, whereas Scheme lifecycle assessment includes global emissions associated with manufacture, transport, construction, operation and decommissioning of the Scheme. A substantial proportion of the Scheme's embodied carbon, including manufacture of PV modules and associated overseas transport, occurs outside UK and would not be included in within UK territorial emissions. Consequentially, the comparison is conservative because the Scheme is assessed using a global lifecycle boundary, whereas projected UK grid	UOD take all these points as very valid and well-expressed. The UoD's only proviso is that if you use anything other than the first year of operation (2029) value for grid GHG intensity, Scheme slips into carbon deficit – see section 3. There is an argument that some of the grid balancing mentioned is necessary because of the increasing reliance on solar, so this

	carbon intensity reflects only territorial emissions. • The calculated net savings does not capture wider benefits of the Scheme. In particular, inclusion of BESS supports grid balancing and can reduce reliance on higher carbon intensity electricity generation. Increasing supply of low carbon electricity is vital for decarbonisation of other sectors including heating and transport, where electrification is expected to play key role in achieving economy wide emissions reductions. • As set out 7.1 Statement of Need [REP1-085], the Scheme is designed to contribute towards the UK's statutory commitment to achieve net zero GHG emissions by 2050, the role of the Scheme extends beyond decarbonising the electricity sector; a secure and abundant supply of low carbon electricity is essential to enable wider transition away from fossil fuels across the economy, supporting emissions reductions in sectors that cannot be decarbonised through changes to electricity generation alone.	probably cannot be entirely claimed as a benefit. In order to contribute to Net Zero by 2050, the Scheme will have to payback before 2050.
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3.0 Comment on Applicant's assessment of Net Savings and its effect on payback

The updated ES [REP5-023] has been extensively reworded to reflect the Applicant's position regarding the comparison of the Scheme against the Grid carbon intensity within the first year of operation (2029). Their main point is that by using the UK Grid Intensity of **48.9 gCO₂e/kWh** as a comparison, the Scheme does indeed make Net savings of **266,507 tCO₂e** for fixed panels and **65,916 tCO₂e** for the tracker panels.

In the updated ES (§7.12.6), the Applicant stresses that UK Grid carbon reflects territorial emissions associated with electricity generation, whereas the Scheme's lifecycle assessment includes global emissions associated with manufacture, transport, construction, operation and decommissioning of the Scheme.

Whilst UoD take on the point that the UK Grid will decarbonise because of Schemes like this, perhaps there is a fairer approach. The Applicant's use of **48.9gCO₂e/kWh** certainly produces a Net Saving of about **266,507 and 65,916 tCO₂e** for fixed and tracker panels

respectively, whilst UoD's approach of comparing the Scheme against a decarbonising Grid (using DESNZ, 2023) shows a deficit using the updated energy output and GHG emissions values presented in the ES [REP5-023]. This is demonstrated in the Appendix, with an explanation of the terms and how the spreadsheets are worked out.

Figures 3.1 and 3.2 show the two contrasting approaches. Cumulative avoided emissions (i.e. those which would be produced by the grid for the same electricity generation of the Scheme) are compared with the incurred emissions of the Scheme (the two different thresholds represent the two panel scenarios: fixed and tracker). In the Applicant's approach (Fig 3.1) payback occurs along with the quoted net savings. The cumulative avoided emissions crosses the Applicant's given lifetime GHG emissions threshold of **1,286,483 and 1,160,670 tCO₂e** for fixed and trackers respectively. On the other hand, in the UoD's approach (Fig 3.2), payback does not occur.

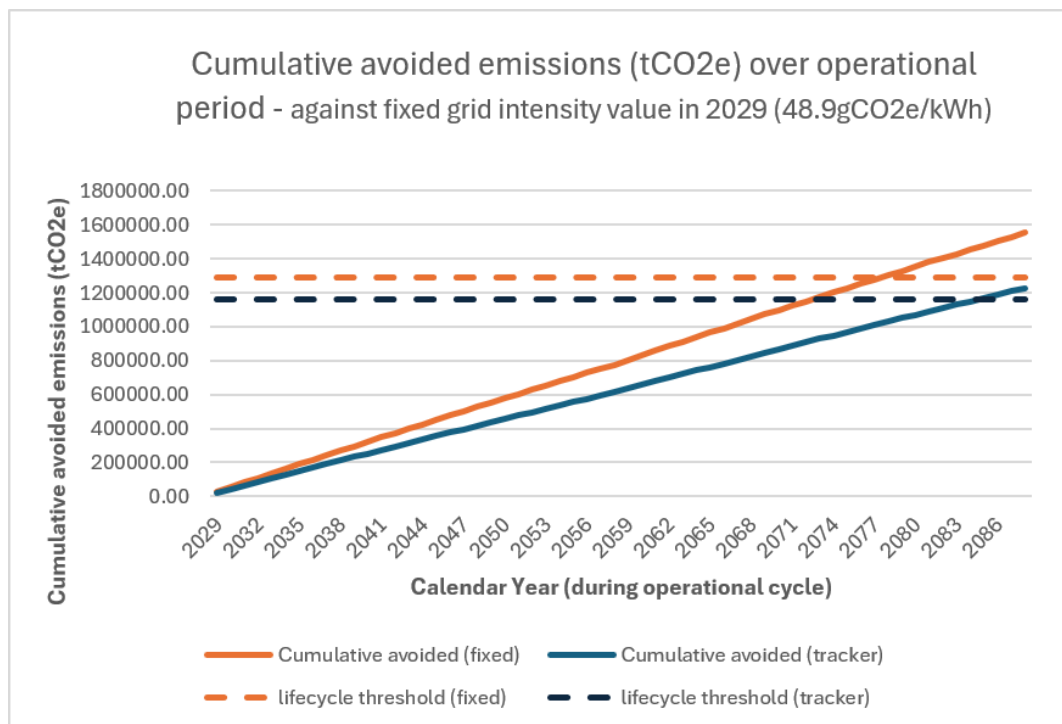


Fig.3.1 Cumulative avoided emissions during operational cycle for fixed value of 48.9gCO₂e/kWh (Grid intensity in 2029)

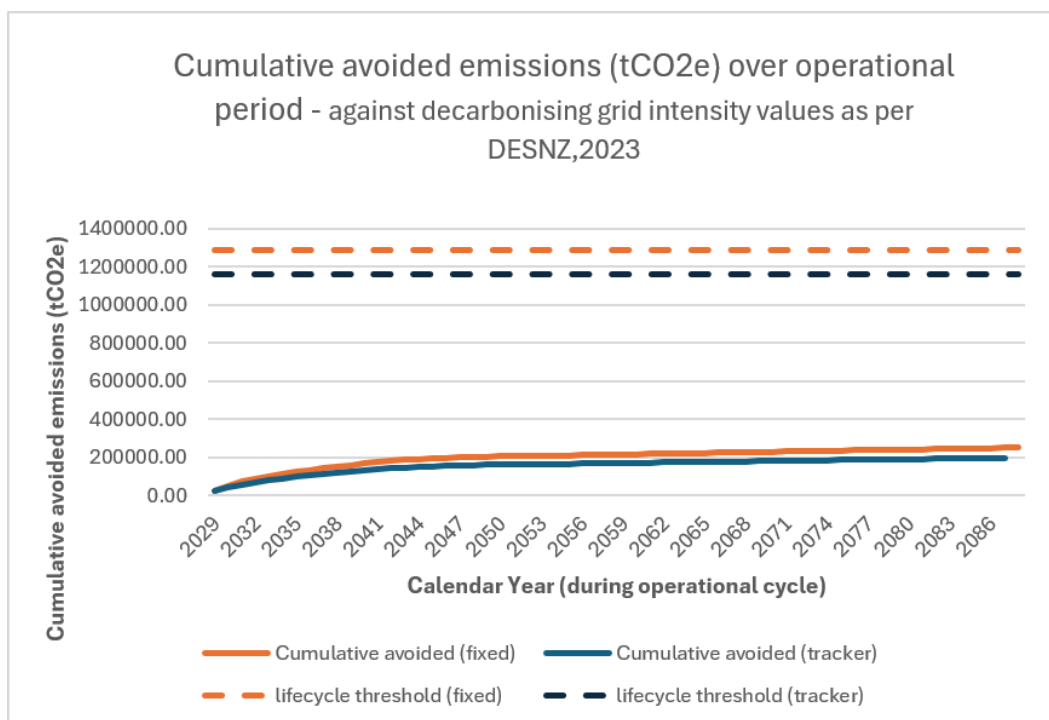


Fig.3.2 Cumulative avoided emissions during operational cycle for decarbonising grid (UoD approach)

Evidently, these almost represent two extremes, and it is likely the true answer lies somewhere between. Using the same rationale in the Appendix spreadsheet, it is possible to calculate the net savings using comparisons made using different Grid intensities to demonstrate this point (3.1)

Table 3.1 Net Savings associated with various Grid Intensities

Grid Intensity used in comparison (gCO ₂ e/kWh)	Net Savings (tCO ₂ e)	
	Fixed	Tracker
48.9	266,593	65,983
45	142,182	-32,279
43	78,686	-82,430
40	-16,558	-157,656

Effectively, a comparison made with the grid intensity, somewhere between 45 and 48.9 gCO₂e/kWh i.e. later than 2029, the net savings will become negative i.e. a net emitter for trackers and at somewhere between **40 and 43 gCO₂e/kWh** likewise for fixed panels. This indicates that it is very sensitive to the grid intensity.

References:

APP-059: Lime Down Solar Park, Environmental Statement Vol 1, Chapter 7: Climate Change, September 2025, Revision 1, [APP-059] Planning Inspectorate Reference: ENO10168, Document Reference: APP/6.1, Island Green Power Ltd.

DESNZ, 2023: Department of Energy Security and Net Zero, (DESNZ, 2023): Data Tables 1-19, Table 1: Electricity emissions factors to 2100 KgCO₂e/kWh, UK Government GHG Conversion Factors for Company Reporting, 2023, Available at:

[REDACTED]
[REDACTED]
[REDACTED]

REP1-138: UoE Appendix B (2026): University of Exeter (Centre for Energy and the Environment), Wiltshire Council Written Representation, Appendix B: GHG Emissions at Lime Down Solar Park Methodology Review, NSIP website (listed as “Written representations and summaries for any exceeding 1500 words” for Wiltshire Council), April 2026

REP1-182: UoD Appendix J1 (2026): Findings of University of Derby on Initial Investigation of the Environmental Statement V1 Chapter 7: Climate Change [APP-059], 30th April 2026, *ENO 10168-001410-Stop Lime Down Climate Change Report* Appendix J1 June 2026

REP5-023: Lime Down Solar Park, Environmental Statement Vol 1, Chapter 7 Climate Change, August 2026, Revision 2, [draft] Planning Inspectorate Reference: ENO10168, Document Reference: APP/6.1.

REP5-108: Lime Down Solar Park, Climate Change Response to Stop Lime Down Appendix D: University of Derby’s response to [REP3-132] August 2026 Revision 1, Planning Inspectorate reference: EN010168, Document Reference: EXAM/9.65.

Appendix: Spreadsheet to compare use of different UK Grid Intensities

Energy Outputs:

Energy Outputs for fixed and tracker panels are based on given values of **560 GWh** and **442.3 GWh** for first year of operation, as presented in the updated ES [REP5-023]. Degradation rates for the panels are presented as 1% in the first year, 0.35% thereafter with the panel being replaced at 30 years. This enables annual energy outputs to be calculated and a cumulation of these values leads to a lifetime generation of about **31.75 TWh and 25.07 TWhb for fixed and tracker panels respectively** (these values are given in the updated ES and confirmed in UoD's spreadsheet).

Avoided Emissions:

Avoided Emissions are those emissions that would be generated by the UK Grid for the same amount of electricity generation as the Scheme. This is calculated thus:

$$\text{Energy Emission (gCO}_2\text{e)} = \text{Energy Output (kWh)} \times \text{GHG Intensity (gCO}_2\text{e/kWh)}$$

The relevant Grid GHG Intensity values are listed in **(DESNZ, 2023)** and presented in this spread sheet.

Net Savings

Net Savings represent the difference between avoided emissions (ie. those that would be produced by the Grid for the same amount of electricity generation) and incurred emissions (i.e. those incurred throughout the lifetime of the Scheme).

$$\text{Net Savings} = \text{Avoided emissions} - \text{Incurred Emissions (tCO}_2\text{e)}$$

The incurred GHG emissions have been updated in the ES and are presented as **1,266,483 tCO₂e and 1,160,670 tCO₂e** (for fixed and tracker panels respectively).

The following spreadsheets show two scenarios: the one the Applicant uses with a comparison against the Grid's performance in the first year of operation (2029) when the Grid Intensity is **48.9 gCO₂e/kWh** and the one that UoD originally used, with a decarbonising Grid as per (DESNZ,2023) but updated energy output and emissions values.

Using fixed Grid Intensity of 48.92gCO2e/kWh																	
		Fixed output GWh		Tracker output GWh		UK Grid Projection (DESNZ, 2023 gCO2e/kWh		Avoided emissions i.e. compared to Grid				Scheme GHG Intensity		Scheme total GHG		NET SAVINGS (avoid-incur)	
		cum		cum				Fixed tCO2e	cum tCO2e	Tracker tCO2e	cum tCO2e	Fixed gCO2e/kWh	Tracker gCO2e/kWh	Fixed tCO2e	Tracker tCO2e	Fixed tCO2e	Tracker tCO2e
Op year																	
1	2029	560.00	560.00	442.3	442.30	48.92	27394.47	27394.47	21636.74	21636.74		27.74	32.55	1,286,483	1,160,670	-1259088.53	-1139033.26
2	2030	554.40	1114.40	437.88	880.18	48.92	27120.52	54514.99	21420.37	43057.11		27.74	32.55	1,286,483	1,160,670	-1231968.01	-1117612.89
3	2031	552.46	1666.86	436.34	1316.52	48.92	27025.60	81540.59	21345.40	64402.50		27.74	32.55	1,286,483	1,160,670	-1204942.41	-1096267.50
4	2032	550.53	2217.39	434.82	1751.34	48.92	26931.01	108471.60	21270.69	85673.19		27.74	32.55	1,286,483	1,160,670	-1178011.40	-1074996.81
5	2033	548.60	2765.98	433.30	2184.63	48.92	26836.75	135308.35	21196.24	106869.43		27.74	32.55	1,286,483	1,160,670	-1151174.65	-1053800.57
6	2034	546.68	3312.66	431.78	2616.41	48.92	26742.82	162051.17	21122.05	127991.49		27.74	32.55	1,286,483	1,160,670	-1124431.83	-1032678.51
7	2035	544.77	3857.43	430.27	3046.68	48.92	26649.22	188700.39	21048.13	149039.61		27.74	32.55	1,286,483	1,160,670	-1097782.61	-1011630.39
8	2036	542.86	4400.29	428.76	3475.44	48.92	26555.95	215256.34	20974.46	170014.07		27.74	32.55	1,286,483	1,160,670	-1071226.66	-990655.93
9	2037	540.96	4941.25	427.26	3902.70	48.92	26463.00	241719.35	20901.05	190915.12		27.74	32.55	1,286,483	1,160,670	-1044763.65	-969754.88
10	2038	539.07	5480.31	425.77	4328.47	48.92	26370.38	268089.73	20827.89	211743.02		27.74	32.55	1,286,483	1,160,670	-1018393.27	-948926.98
11	2039	537.18	6017.49	424.28	4752.74	48.92	26278.09	294367.82	20755.00	232498.01		27.74	32.55	1,286,483	1,160,670	-992115.18	-928171.99
12	2040	535.30	6552.79	422.79	5175.53	48.92	26186.11	320553.94	20682.35	253180.37		27.74	32.55	1,286,483	1,160,670	-965929.06	-907489.63
13	2041	533.43	7086.22	421.31	5596.85	48.92	26094.46	346648.40	20609.97	273790.33		27.74	32.55	1,286,483	1,160,670	-939834.60	-886879.67
14	2042	531.56	7617.77	419.84	6016.68	48.92	26003.13	372651.53	20537.83	294328.16		27.74	32.55	1,286,483	1,160,670	-913831.47	-866341.84
15	2043	529.70	8147.47	418.37	6435.05	48.92	25912.12	398563.65	20465.95	314794.11		27.74	32.55	1,286,483	1,160,670	-887919.35	-845875.89
16	2044	527.84	8675.32	416.90	6851.95	48.92	25821.43	424385.08	20394.32	335188.43		27.74	32.55	1,286,483	1,160,670	-862097.92	-825481.57
17	2045	526.00	9201.31	415.44	7267.39	48.92	25731.05	450116.14	20322.94	355511.37		27.74	32.55	1,286,483	1,160,670	-836366.86	-805158.63
18	2046	524.16	9725.47	413.99	7681.38	48.92	25641.00	475757.13	20251.81	375763.18		27.74	32.55	1,286,483	1,160,670	-810725.87	-784906.82
19	2047	522.32	10247.79	412.54	8093.92	48.92	25551.25	501308.38	20180.93	395944.10		27.74	32.55	1,286,483	1,160,670	-785174.62	-764725.90
20	2048	520.49	10768.28	411.10	8505.02	48.92	25461.82	526770.21	20110.29	416054.40		27.74	32.55	1,286,483	1,160,670	-759712.79	-744615.60
21	2049	518.67	11286.95	409.66	8914.68	48.92	25372.71	552142.91	20039.91	436094.30		27.74	32.55	1,286,483	1,160,670	-734340.09	-724575.70
22	2050	516.86	11803.81	408.22	9322.90	48.92	25283.90	577426.81	19969.77	456064.07		27.74	32.55	1,286,483	1,160,670	-709056.19	-704605.93
23	2051	515.05	12318.85	406.79	9729.70	48.92	25195.41	602622.22	19899.87	475963.94		27.74	32.55	1,286,483	1,160,670	-683860.78	-684706.06
24	2052	513.24	12832.10	405.37	10135.07	48.92	25107.22	627729.45	19830.22	495794.17		27.74	32.55	1,286,483	1,160,670	-658753.55	-664875.83
25	2053	511.45	13343.55	403.95	10539.02	48.92	25019.35	652748.80	19760.82	515554.99		27.74	32.55	1,286,483	1,160,670	-633734.20	-645115.01
26	2054	509.66	13853.20	402.54	10941.56	48.92	24931.78	677680.58	19691.66	535246.64		27.74	32.55	1,286,483	1,160,670	-608802.42	-625423.36
27	2055	507.87	14361.08	401.13	11342.69	48.92	24844.52	702525.10	19622.73	554869.38		27.74	32.55	1,286,483	1,160,670	-583957.90	-605800.62
28	2056	506.10	14867.17	399.73	11742.41	48.92	24757.56	727282.66	19554.05	574423.43		27.74	32.55	1,286,483	1,160,670	-559200.34	-586246.57
29	2057	504.32	15371.50	398.33	12140.74	48.92	24670.91	751953.57	19485.62	593909.05		27.74	32.55	1,286,483	1,160,670	-534529.43	-566760.95
30	2058	502.56	15874.06	396.93	12537.67	48.92	24584.56	776538.14	19417.42	613326.46		27.74	32.55	1,286,483	1,160,670	-509944.86	-547343.54
31	2059	560.00	16434.06	442.3	12979.97	48.92	27394.47	803932.60	21636.74	634963.20		27.74	32.55	1,286,483	1,160,670	-482550.40	-525706.80
32	2060	554.40	16988.46	437.88	13417.85	48.92	27120.52	831053.13	21420.37	656383.57		27.74	32.55	1,286,483	1,160,670	-455429.87	-504286.43
33	2061	552.46	17540.92	436.34	13854.19	48.92	27025.60	858078.72	21345.40	677728.96		27.74	32.55	1,286,483	1,160,670	-428404.28	-482941.04
34	2062	550.53	18091.44	434.82	14289.01	48.92	26931.01	885009.73	21270.69	698999.65		27.74	32.55	1,286,483	1,160,670	-401473.27	-461670.35
35	2063	548.60	18640.04	433.30	14722.31	48.92	26836.75	911846.49	21196.24	720195.89		27.74	32.55	1,286,483	1,160,670	-374636.51	-440474.11
36	2064	546.68	19186.72	431.78	15154.08	48.92	26742.82	938589.31	21122.05	741317.95		27.74	32.55	1,286,483	1,160,670	-347893.69	-419352.05
37	2065	544.77	19731.49	430.27	15584.35	48.92	26649.22	965238.53	21048.13	762366.08		27.74	32.55	1,286,483	1,160,670	-321244.47	-398303.92
38	2066	542.86	20274.35	428.76	16013.11	48.92	26555.95	991794.48	20974.46	783340.53		27.74	32.55	1,286,483	1,160,670	-294688.52	-377329.47
39	2067	540.96	20815.31	427.26	16440.37	48.92	26463.00	1018257.49	20901.05	804241.58		27.74	32.55	1,286,483	1,160,670	-268225.51	-356428.42
40	2068	539.07	21354.37	425.77	16866.14	48.92	26370.38	1044627.87	20827.89	825069.48		27.74	32.55	1,286,483	1,160,670	-241855.13	-335600.52
41	2069	537.18	21891.55	424.28	17290.42	48.92	26278.09	1070905.96	20755.00	845824.47		27.74	32.55	1,286,483	1,160,670	-215577.04	-314845.53
42	2070	535.30	22426.85	422.79	17713.21	48.92	26186.11	1097092.07	20682.35	866506.83		27.74	32.55	1,286,483	1,160,670	-189390.93	-294163.17
43	2071	533.43	22960.27	421.31	18134.52	48.92	26094.46	1123186.54	20609.97	887116.80		27.74	32.55	1,286,483	1,160,670	-163296.46	-273553.20
44	2072	531.56	23491.83	419.84	18554.35	48.92	26003.13	1149189.67	20537.83	907654.63		27.74	32.55	1,286,483	1,160,670	-137293.33	-253015.37
45	2073	529.70	24021.53	418.37	18972.72	48.92	25912.12	1175101.79	20465.95	928120.58		27.74	32.55	1,286,483	1,160,670	-111381.21	-232549.42
46	2074	527.84	24549.37	416.90	19389.62	48.92	25821.43	1200923.22	20394.32	948514.89		27.74	32.55	1,286,483	1,160,670	-85559.78	-212155.11
47	2075	526.00	25075.37	415.44	19805.07	48.92	25731.05	1226654.27	20322.94	968837.83		27.74	32.55	1,286,483	1,160,670	-59828.73	-191832.17
48	2076</																

Using decarbonising grid as comparison:								UK Grid		Avoided emissions i.e. compared to Grid				Scheme GHG Intensity		Scheme total GHG		NET SAVINGS (avoid-incur)	
		Fixed output GWh		Tracker output GWh		Projection (DESNZ, 2023)		gCO2e/kWh		Fixed	cumulative	Tracker	cumulative	Fixed	Tracker	Fixed	Tracker	Fixed	Tracker
Op year		cum		cum						tCO2e	tCO2e	tCO2e	tCO2e	gCO2e/kWh	gCO2e/kWh	tCO2e	tCO2e	tCO2e	tCO2e
1	2029	560.00	560.00	442.3	442.30	48.92				27394.47	27394.47	21636.74	21636.74	27.74	32.55	1,286,483	1,160,670	-1259088.53	-1139033.26
2	2030	554.40	1114.40	437.88	880.18	45.13				25020.94	52415.41	19762.08	41398.81	27.74	32.55	1,286,483	1,160,670	-1234067.59	-1119271.19
3	2031	552.46	1666.86	436.34	1316.52	37.92				20948.43	73363.84	16545.52	57944.33	27.74	32.55	1,286,483	1,160,670	-1213119.16	-1102725.67
4	2032	550.53	2217.39	434.82	1751.34	29.86				16438.71	89802.55	12983.64	70927.98	27.74	32.55	1,286,483	1,160,670	-1196680.45	-1089742.02
5	2033	548.60	2765.98	433.30	2184.63	23.70				13001.80	102804.35	10269.10	81197.08	27.74	32.55	1,286,483	1,160,670	-1183678.65	-1079472.92
6	2034	546.68	3312.66	431.78	2616.41	21.05				11504.86	114309.21	9086.79	90283.86	27.74	32.55	1,286,483	1,160,670	-1172173.79	-1070386.14
7	2035	544.77	3857.43	430.27	3046.68	18.39				10018.24	124327.45	7912.62	98196.48	27.74	32.55	1,286,483	1,160,670	-1162155.55	-1062473.52
8	2036	542.86	4400.29	428.76	3475.44	17.64				9576.03	133903.48	7563.36	105759.84	27.74	32.55	1,286,483	1,160,670	-1152579.52	-1054910.16
9	2037	540.96	4941.25	427.26	3902.70	16.89				9136.80	143040.28	7216.44	112976.28	27.74	32.55	1,286,483	1,160,670	-1143442.72	-1047693.72
10	2038	539.07	5480.31	425.77	4328.47	16.14				8700.52	151740.80	6871.86	119848.13	27.74	32.55	1,286,483	1,160,670	-1134742.20	-1040821.87
11	2039	537.18	6017.49	424.28	4752.74	15.39				8267.18	160007.98	6529.60	126377.73	27.74	32.55	1,286,483	1,160,670	-1126475.02	-1034292.27
12	2040	535.30	6552.79	422.79	5175.53	14.64				7836.77	167844.76	6189.65	132567.39	27.74	32.55	1,286,483	1,160,670	-1118638.24	-1028102.61
13	2041	533.43	7086.22	421.31	5596.85	13.15				7015.61	174860.37	5541.08	138108.46	27.74	32.55	1,286,483	1,160,670	-1111622.63	-1022561.54
14	2042	531.56	7617.77	419.84	6016.68	11.66				6200.10	181060.46	4896.97	143005.43	27.74	32.55	1,286,483	1,160,670	-1105422.54	-1017664.57
15	2043	529.70	8147.47	418.37	6435.05	10.18				5390.20	186450.67	4257.30	147262.73	27.74	32.55	1,286,483	1,160,670	-1100032.33	-1013407.27
16	2044	527.84	8675.32	416.90	6851.95	8.69				4585.91	191036.57	3622.05	150884.78	27.74	32.55	1,286,483	1,160,670	-1095446.43	-1009785.22
17	2045	526.00	9201.31	415.44	7267.39	7.20				3787.17	194823.75	2991.19	153875.97	27.74	32.55	1,286,483	1,160,670	-1091659.25	-1006794.03
18	2046	524.16	9725.47	413.99	7681.38	6.22				3258.51	198082.26	2573.64	156449.61	27.74	32.55	1,286,483	1,160,670	-1088400.74	-1004220.39
19	2047	522.32	10247.79	412.54	8093.92	5.23				2733.50	200815.76	2158.98	158608.59	27.74	32.55	1,286,483	1,160,670	-1085667.24	-1002061.41
20	2048	520.49	10768.28	411.10	8505.02	4.25				2212.13	203027.90	1747.19	160355.78	27.74	32.55	1,286,483	1,160,670	-1083455.10	-1000314.22
21	2049	518.67	11286.95	409.66	8914.68	3.27				1694.38	204722.27	1338.25	161694.04	27.74	32.55	1,286,483	1,160,670	-1081760.73	-998975.96
22	2050	516.86	11803.81	408.22	9322.90	2.28				1180.22	205902.49	932.16	162626.20	27.74	32.55	1,286,483	1,160,670	-1080580.51	-998043.80
23	2051	515.05	12318.85	406.79	9729.70	2.28				1176.09	207078.58	928.90	163555.10	27.74	32.55	1,286,483	1,160,670	-1079404.42	-997114.90
24	2052	513.24	12832.10	405.37	10135.07	2.28				1171.97	208250.55	925.65	164480.74	27.74	32.55	1,286,483	1,160,670	-1078232.45	-996189.26
25	2053	511.45	13343.55	403.95	10539.02	2.28				1167.87	209418.41	922.41	165403.15	27.74	32.55	1,286,483	1,160,670	-1077064.59	-995266.85
26	2054	509.66	13853.20	402.54	10941.56	2.28				1163.78	210582.20	919.18	166322.33	27.74	32.55	1,286,483	1,160,670	-1075900.80	-994347.67
27	2055	507.87	14361.08	401.13	11342.69	2.28				1159.71	211741.90	915.96	167238.29	27.74	32.55	1,286,483	1,160,670	-1074741.10	-993431.71
28	2056	506.10	14867.17	399.73	11742.41	2.28				1155.65	212897.55	912.76	168151.05	27.74	32.55	1,286,483	1,160,670	-1073585.45	-992518.95
29	2057	504.32	15371.50	398.33	12140.74	2.28				1151.60	214049.16	909.56	169060.61	27.74	32.55	1,286,483	1,160,670	-1072433.84	-991609.39
30	2058	502.56	15874.06	396.93	12537.67	2.28				1147.57	215196.73	906.38	169966.99	27.74	32.55	1,286,483	1,160,670	-1071286.27	-990703.01
31	2059	560.00	16434.06	442.3	12979.97	2.28				1278.74	216475.46	1009.97	170976.96	27.74	32.55	1,286,483	1,160,670	-1070007.54	-989693.04
32	2060	554.40	16988.46	437.88	13417.85	2.28				1265.95	217741.41	999.87	171976.83	27.74	32.55	1,286,483	1,160,670	-1068741.59	-988693.17
33	2061	552.46	17540.92	436.34	13854.19	2.28				1261.52	219002.93	996.37	172973.21	27.74	32.55	1,286,483	1,160,670	-1067480.07	-987696.79
34	2062	550.53	18091.44	434.82	14289.01	2.28				1257.10	220260.03	992.89	173966.09	27.74	32.55	1,286,483	1,160,670	-1066222.97	-986703.91
35	2063	548.60	18640.04	433.30	14722.31	2.28				1252.70	221512.73	989.41	174955.50	27.74	32.55	1,286,483	1,160,670	-1064970.27	-985714.50
36	2064	546.68	19186.72	431.78	15154.08	2.28				1248.32	222761.05	985.95	175941.45	27.74	32.55	1,286,483	1,160,670	-1063721.95	-984728.55
37	2065	544.77	19731.49	430.27	15584.35	2.28				1243.95	224005.00	982.50	176923.95	27.74	32.55	1,286,483	1,160,670	-1062478.00	-983746.05
38	2066	542.86	20274.35	428.76	16013.11	2.28				1239.59	225244.59	979.06	177903.01	27.74	32.55	1,286,483	1,160,670	-1061238.41	-982766.99
39	2067	540.96	20815.31	427.26	16440.37	2.28				1235.26	226479.85	975.63	178878.64	27.74	32.55	1,286,483	1,160,670	-1060003.15	-981791.36
40	2068	539.07	21354.37	425.77	16866.14	2.28				1230.93	227710.78	972.22	179850.86	27.74	32.55	1,286,483	1,160,670	-1058772.22	-980819.14
41	2069	537.18	21891.55	424.28	17290.42	2.28				1226.62	228937.41	968.81	180819.67	27.74	32.55	1,286,483	1,160,670	-1057545.59	-979850.33
42	2070	535.30	22426.85	422.79	17713.21	2.28				1222.33	230159.74	965.42	181785.09	27.74	32.55	1,286,483	1,160,670	-1056323.26	-978884.91
43	2071	533.43	22960.27	421.31	18134.52	2.28				1218.05	231377.79	962.04	182747.14	27.74	32.55	1,286,483	1,160,670	-1055105.21	-977922.86
44	2072	531.56	23491.83	419.84	18554.35	2.28				1213.79	232591.58	958.68	183705.81	27.74	32.55	1,286,483	1,160,670	-1053891.42	-976964.19
45	2073	529.70	24021.53	418.37	18972.72	2.28				1209.54	233801.12	955.32	184661.14	27.74	32.55	1,286,483	1,160,670	-1052681.88	-976008.86
46	2074	527.84	24549.37	416.90	19389.62	2.28				1205.31	235006.43	951.98	185613.12	27.74	32.55	1,286,483	1,160,670	-1051476.57	-975056.88
47	2075	526.00	25075.37	415.44	19805.07	2.28				1201.09	236207.52	948.65	186561.76	27.74	32.55	1,286,483	1,160,670	-1050275.48	-974108.24
48	2076	524.16	25599.53	413.99	20219.05	2.28				1196.89	237404.41	945.33	187507.09	27.74	32.55	1,286,483	1,160,670	-1049078.59	-973162.91
49	2077	522.32	26121.85	412.54	20631.59	2.28				1192.70	238597.10	942.02	188449.10	27.74	32.55	1,286,483	1,160,670	-1047885.90	-972220.90
50	2078	520.49	26642.34	411.10	21042.69	2.28				1188.52	239785.63	938.72	189387.83	27.74	32.55	1,286,483	1,160,670	-1046697.37	-971282.17
51	2079	518.67	27161.01	409.66	21452.35	2.28				1184.36	240969.99	935.43	190323.26	27.74	32.55	1,286,483	1,160,670	-1045513.01	-970346.74
52	2080	516.86	27677.87	408.22	21860.57	2.28				1180.22	242150.21	932.16	191255.42	27.74	32.55	1,286,483	1,160,670	-1044332.79	-969414.58
53	2081	515.05	28192.91	406.79	22267.37	2.28				1176.09	243326.29	928.90	192184.32	27.74	32.55	1,286,483	1,160,670	-1043156.71	-968485.68
54	2082	513.24	28706.16	405.37	22672.74	2.28				1171.97	244498.26	925.65	193109.97	27.74	32.55	1,286,483	1,160,670	-1041984.74	-967560.03
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