

Lime Down Solar Park

**Planning Inspectorate Reference:
EN010168**

**Wiltshire Council Comments on Submissions
Received at Deadline 5**

Deadline 6 (21 August 2026)

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1. 2.7 TPO and Hedgerow Plan (Rev 2)

- 1.1. The Council notes changes to the Index Plan and Sheet 4 to accommodate the small extension of the order limits at 'Lime Down D' to allow the emergency access from the BESS area to be connected with the public highway, in accordance with 'Change 1, as set out in the change application **[CR1-045]**. - No additional landscape concerns are identified to result from this change.

2. 3.1 Draft Development Consent Order (Rev 5)

Article 40 – Schedule 12 – Part 3

- 2.1. TPO8 should be included in the schedule due to the impact on the protected trees to the North of Grittleton House and the HHD trenchless solutions and siting of temporary compounds.

Article 41 - Trees subject to tree preservation orders

- 2.2 Where, during operation of the authorised development, a retained BS 5837:2012 Category A or Category B tree, or any veteran or ancient tree, is felled or removed for reasons including safety, disease, structural failure or other operational necessity, the undertaker shall notify Wiltshire Council in writing within five working days of the tree being felled or removed.

The notification shall include:

- the location and reference number of the tree;
- the reason for the felling or removal; and
- the date on which the works were undertaken

Wiltshire Council Response: This needs to be reworded to ensure that sufficient notice is provided, as described below.

Wiltshire Council requires a distinction between dead and dangerous trees, where we are notified before removal (5 working days' Notice) unless there's an immediate safety risk.

Where, during operation of the authorised development, a retained BS 5837:2012 Category A or Category B tree, or any veteran or ancient tree, requires felling or removal due to disease, structural failure, safety concerns or other operational necessity, the undertaker shall notify Wiltshire Council in writing, providing at least five working days prior to the felling or removal of a dead or dangerous tree, protected by a Tree Preservation Order or within a Conservation Area.

Where works are urgently necessary because the tree presents an immediate risk of serious harm, notification shall be provided as soon as practicable following the completion of the works, and shall include:
the location and reference number of the tree;
the reason for the felling or removal;
the date on which the works were undertaken; and
where applicable, a brief arboricultural justification explaining why the works were considered urgently necessary.

Please find a link below to the Government website where you can access the above information.

<https://www.gov.uk/guidance/tree-preservation-orders-and-trees-in-conservation-areas#dead-trees-and-branches>

3. 6.1 Environmental Statement Volume 1 Chapter 7 Climate Change (Rev 2)

- 3.1. The Applicant has updated the Climate Change chapter of the Environmental Statement (EN010168) to provide greater clarity on a number of matters. These revisions include further explanation of the number of fixed and tracked solar photovoltaic (PV) panels and their associated impacts, incorporation of Environmental Product Declaration (EPD) data, and clarification of the methodology used to compare the Scheme's emissions against the carbon intensity of grid electricity.
- 3.2. The revised calculations have resulted in an increase in the estimated embodied carbon emissions of the Scheme and, consequently, an increase in the total calculated carbon emissions and carbon intensity of the development. The updated assessment has also resulted in an increase in the forecast electricity generation from the Scheme.
- 3.3. The revisions provide a more comprehensive explanation of the Scheme's overall climate change benefits, whereby co-benefits include the contribution of the Battery Energy Storage System (BESS) to grid balancing and resilience, as well as the Scheme's role in supporting the decarbonisation of the national electricity supply. This, in turn, facilitates wider decarbonisation across other sectors, including housing and transport.
- 3.4. Wiltshire Council welcomes the additional work undertaken by the Applicant to improve transparency regarding the assessment of carbon emissions, including clarification of assumptions and methodologies applied. A number of the revisions respond to concerns identified within the University of Exeter report (submitted as part of Wiltshire Council's Written Statement), although not all matters raised have been addressed. The Council notes that the report's observations and conclusions may still remain relevant in respect of certain

methodological choices, including the comparison of Scheme emissions against the carbon intensity of the electricity grid in the first year of operation, rather than against the projected grid intensity for each year across the operational lifetime of the development.

- 3.5. Nevertheless, the Council accepts that the amendments provide greater transparency and assist in understanding the basis of the assessment. Whilst the council cannot comment on the precise figures and methodology, the Council maintains its previous position that the Scheme would deliver an overall benefit in terms of carbon emissions reduction and considers that the revised assessment more clearly contextualises and demonstrates those benefits.

4. 6.2 Environmental Statement Volume 2

Figure 8-10 Viewpoints (Rev 2).

The Council notes the addition of viewpoint locations for the ExA's additionally requested Viewpoints referenced as 'VP ExA 1' (Lime Down D) and 'VP ExA 2' (Lime Down D) included on the maps **[REP5-043]**.

Figure 8-14 Baseline Photography and Photomontages – Viewpoint 45 to CNL G (Part 3) (Rev 4).

The Council notes the additional inclusion of baseline photography (summer views) and summer photomontages for the Examining Authority's additionally requested Viewpoints; 'VP ExA 1' & 'VP ExA 2', alongside illustrative sections between field parcels D3 and D5, and northwest of field D13, both illustrating the existing, year 1 and year 15 scenarios for public footpath users inserted at the end of the document **[REP5-044]**.

[REP5-039] 6.2 ES Vol 2. Figure 3-4-1 to 3-4-2 Landscape and Ecology Mitigation Plan (rev 3) (1 of 4);

[REP5-040] 6.2 ES Vol 2. Figure 3-4-3.1 to 3-4-3.2 Landscape and Ecology Mitigation Plan (rev 3) (2 of 4);

[REP5-041] 6.2 ES Vol 2. Figure 3-4-4.1 to 3-4-4.2 Landscape and Ecology Mitigation Plan (rev 4) (3 of 4);

[REP5-042] 6.2 ES Vol 2. Figure 3-4-5.1 to 3-4-5.2 Landscape and Ecology Mitigation Plan (rev 4) (4 of 4).

The Council has assumed that the plans have been amended to primarily reflect DCO boundary limit changes arising from the applicants Change Request 1 application which has been accepted into Examination. The Council notes the alternative AIL road route through field parcels E2, E3 to reach the planned 132kV substation in field parcel E5 (Lime Down E) with the aim of avoiding impacts to Bincombe Wood (Ancient Woodland) from the original planned route. However,

the Council observes that the original AIL route running along the northern edge of Bincombe Wood still remains on the Lime Down E Figures **[REP5-042]** in addition to the revised AIL track route around the northern and eastern edges of field parcel E3.

The Council considers that the 'Landscape and Ecological Mitigation Plans' **[REP5-039; 040; 041; 042]** should be revised to differentiate between the different internal access track / road functions, with different keyed line-type colours, as they are all currently the same light brown colour, so specific routes and the differences within illustrative construction details **[REP5-066]** are not clear on the plans. The Council suggests the following three types of internal access tracks could and should be separately keyed and illustrated on plans;

- 'Internal tracks to provide AIL access to the proposed 132kV substations' (surfaced with granular porous materials). (As illustrated within **[REP5-066]** ES, Vol 3, APP/6.3, Appendix 3-3, illustrative drawings).
- 'Internal tracks/roads to provide AIL access to the proposed 400kV substation and BESS area' (surfaced with non-porous macadam materials) incorporating roadside ditch/es (As illustrated within **[REP5-066]** ES, Vol 3, APP/6.3, Appendix 3-3, illustrative drawings).
- 'Internal access tracks within solar panel fields' (surfaced with granular porous materials) which should be incorporated into **[REP5-066]** as **an additional illustrative drawing***;

*The Council suggests that if the illustrative construction details for 'Internal access tracks within the Solar Panel fields' is unlikely to differ from the illustrative construction details for the 'AIL Internal Access Road Cross-Sections for 132kV Substations', then the drawing could simply be re-titled 'Internal tracks to provide AIL access to the proposed 132kV substations & Solar Panel fields,' then only two types of access track would require to be included on the plans.

5. 6.3 Environmental Statement Volume 3 Appendix 8-1 Landscape and Visual Assessment Methodology (Rev 3)

- 5.1. The Council notes the inclusion of the ExA's additionally requested Viewpoints 1 and 2 (as summer views) at the end of Section 5, Photography and Photomontage Methodology **[REP5-068]**.

6. 6.3 Environmental Statement Volume 3 Assessments of Effects on the CNL and its Special Qualities (Rev 2)

- 6.1. The Council understands the revision is to consolidate the submission into the ES Volume 3 (as appendix 8-6), following its initial submission as part of the applicant's Change Request 1, at the request of the ExA.
- 6.2. One further observation by the Council, not previously made is that the report makes numerous references to the proposed restoration of dry-stone walls, e.g. at page 96, para 3.4.40 under *"Related Positive Outcomes - In accordance with the duty to 'seek to further' the purpose of an CNL and Policy CE2.1, The Lime Down Scheme proposes enhancement measures within the setting of the CNL including the restoration of dry-stone walls, enhancement of existing hedgerows and re-establishment of historic hedgerows within the setting of the CNL."*
- 6.3. The Council is unable to locate specific locations to understand the extent to which the applicant is proposing to restore dry-stone walls within the setting of the CNL on the submitted Landscape and Ecological Mitigation Plan for Lime Down A [REP5-039] despite it being referenced on the key. The Council understands drystone walls are present along the eastern edge of field parcels A1 and A2, but they are not currently discernible. The Council believes the thin dashed brown line, is currently obscured by the thicker red line, denoting the order limit boundary. The Council considers it important to clearly identify where existing drystone walls are proposed to be restored on the 'Landscape and Ecology Mitigation Plan/s' and [REP5-039] revised to address this.
- 6.4. The Council additionally notes reference within the drawing key to '**existing drystone wall to be retained**' within the 'Landscape and Ecological Mitigation Plan' for Lime Down A [REP5-039]. The Council suggests that the current wording on this drawing key should be changed to '**existing drystone wall to be retained and restored**', alongside clearer visual identification on the plan to where these walls are located would provide greater planning certainty that the restoration of drystone walls will be delivered by the project and a clear link to Requirement 7 (Landscape and Ecological Management Plan) is secured.

7. [Blank]

8. [Blank]

9. [Blank]

10. [Blank]

11. [Blank]

12. 7.12 Outline Construction Environmental Management Plan (Rev 6)

Impacts to Ancient Woodland (North Bincombe Wood) from access tracks:

Access tracks will be aligned to maintain a minimum 15 m buffer from the boundary of North Bincombe Wood Ancient Woodland, whilst also maintaining a minimum 50 m buffer from the Great Crested Newt (GCN) pond identified between Fields E1 and E2 (as identified in ES Volume 2, Figure 2-2: Figure 2-2-1 to 2-2-5 Field Boundaries and Numbering [APP-078]).

Adjacent to North Bincombe Wood, any upgrades to the existing track will follow a specialist 'no-dig' construction methodology and specification to avoid the need to excavate and potentially incur root damage. If required, the access track will be built on top of the existing ground level, with no digging into the ground for a sub-base. No heavy vehicles or machinery will be used along the track where it is adjacent to North Bincombe Wood.

No monitoring required

Wiltshire Council Response – Discussions are still ongoing between parties and will be considered at DL6.

REP4-049 – Outline construction environmental Management Plan – Page 100 – para 3.1.113:

Wiltshire Council Archaeology Service (WCAS) are content with the mitigation work proposed by the applicant's archaeological consultant. Public engagement during the mitigation work has been stipulated as a requirement of archaeological works by WCAS.

13. 7.13 Outline Operational Environmental Management Plan (Rev 6)

Where, during operation of the authorised development, a retained BS 5837:2012 Category A or Category B tree, or any veteran or ancient tree, is felled or removed for reasons including safety, disease, structural failure or

other operational necessity, the undertaker shall notify Wiltshire Council in writing within five working days of the tree being felled or removed. The notification shall include:

- the location and reference number of the tree;
- the reason for the felling or removal; and
- the date on which the works were undertaken

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Where works are urgently necessary because the tree presents an immediate risk of serious harm, notification shall be provided as soon as practicable following the completion of the works, and shall include:

- the location and reference number of the tree;
- the reason for the felling or removal;
- the date on which the works were undertaken; and
- where applicable, a brief arboricultural justification explaining why the works were considered urgently necessary.

Please find a link below to the Government website where you can access the above information.

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14. 7.15 Outline Soil Resources Management Plan (Rev 4)

- 14.1. The Council provided comments at Deadline 4 in relation to the OSRMP (Rev 3) **[REP4-054]** within its response to ExQ2- DCO 2.1.2, ExA's Second Written Questions **[PD-015]** including comments on additional principles for locating soil stockpiles (para. 1.8.22) and the introduction of maximum stockpile parameters (para.

1.8.24). Significant concerns remain regarding the scale of soil storage required/proposed, the absence of identified stockpile locations, which in the Councils view risks subsequent conflict with areas of embedded mitigation, stated Design Principles and Parameters and best practice referenced from within various outline Management Plans.

- 14.2. The Council remains concerned that no indicative stockpile locations have been identified on any supporting plans. While the revised oSRMP (Rev 4) **[REP5-078]**, para. 1.8.23, references good practice measures such as 'avoiding impacts on trees, watercourses and areas of construction activities', it does not adequately address other key environmental constraints, including overland surface water flow routes, embedded mitigation areas, ecological and environmental buffers, or require consideration of landscape character or visual amenity interests.
- 14.3. Given the potential extent of soil stockpiles required, the Council considers that indicative stockpile locations should be included on the Works Plans, or alternatively that clear spatial constraints and exclusions should be incorporated within mitigation strategies, or that a requirement for a '**detailed Soil Stockpile Constraints Plan**' be prepared to clearly illustrate the land areas which would not be suitable for soil stockpiling, such as on steeper sloping land, flood zones, overland surface water paths, embedded mitigation areas and environmental buffers etc. in order to address all relevant environmental constraints, design principles and best practice referenced to be followed from within Management Plans.
- 14.4. At the very least the Council would wish to see para. 1.8.23 **[REP5-078]** expanded to list all relevant environmental constraints, and mitigation areas, not just 'root- or crown-spread of trees, adjacent to watercourses or in locations where they will be disturbed or contaminated by other construction activities.'

15. 7.19 Outline Ecological Protection and Mitigation Strategy (Rev 5)

TPO and Hedgerow Removal Plans

There is distinct lack of information between several of the plans, for example, between sheet 25, sheet 26, and sheet 27, there is a large element of hedgerow and protected trees that are affected by the cable route corridor where no plan has been provided.

16. 7.22 Outline Construction Traffic Management Plan (Rev 5)

The Applicant considers that appropriate mitigation and monitoring are already secured through the Arboricultural Method Statement and the Outline CEMP [REP4-049], which together provide suitable protection for **Surrendell Wood** during construction.

Notwithstanding this position, discussions with Wiltshire Council are continuing to determine whether any additional commitments can be agreed. Subject to the outcome of those discussions, the Applicant will provide any agreed amendments to the relevant management plans at Deadline 6. Until that time, this matter remains under discussion between the parties.

Wiltshire Council Response – Discussions are still ongoing between parties and will be considered at DL6.

Built Heritage Comments:

		Questions [PD-014]
Paragraph 2.1.11	Clarification of access via Rodbourne Road during day-to-day operation only	Updated in response to WC conservation officer comments.

and decommissioning phases only.

[2.1.11](#) [In relation to the existing highway between Rodbourne Road and the fork in the road approximately 270m to the west, this section will be used to route to accesses 11-17, shown in ES Volume 2, Figure 13-11 \[APP-156\], during the operational phase only. Vehicle movements will be associated with occasional maintenance as well as replacement of panels and equipment when required. Existing agricultural use will be maintained. Vegetation clearance will be limited to trimming of the hedgerow. In this location, there will be no hedgerow removal \(refer to Annex A of the Outline Ecological Protection and Mitigation Strategy REP3-103\), and no street furniture or lighting added.](#)

Comment: Confirmation regarding the scope of the Highway improvement Works at this location is welcomed and removes the concerns raised in respect of potential impact on the Rodbourne Conservation Area from works to the access.

17. 9.55 Applicants response to submissions received at D4

- 17.1. The applicant has included a response to Wiltshire Council's Post Hearing Submissions [REP4-092] within Table 2-9 [REP5-098]. The table includes 44 individual Reference points covering (ISH 2) for Landscape and Visual Matters (WC-004 to WC-047 inclusive). The Council comments on these themed reference points where relevant as follows;

Landscape Fabric

WC-004 – The uncertainty around the definition of ‘Landscape Fabric’ used and applied within the applicant’s LVIA’s, ‘Landscape Assessment’ was identified as an issue from the project’s outset, initially raised within the Council’s PEIR stage review comments. This matter has been continually raised as an issue and questioned by the Council prior to and throughout the examination process within its various formal responses.

As previously highlighted by the Council, there is no definition of ‘Landscape Fabric’ contained within the GLVIA3 Glossary definitions. The Council has set out in detail with references to specific paragraphs in this guidance, where the applicant, in the Council’s view, has not interpreted or applied this guidance correctly within their LVIA, landscape assessment, which in the Council considers ultimately culminates in the omission and/or under reporting of adverse change effects for some landscape elements, while over stating the beneficial effects for others.

GLVIA3 contains a Glossary of definitions commonly used for ‘Landscape and Visual Impact Assessment’, pages 155-159. There is no definition of ‘**Landscape Fabric**’ within GLVIA3.

GLVIA3 Glossary definition (page 156) defines ‘**Elements**’ as... *“Individual parts which make up the landscape, such as, for example, trees, hedges and buildings.”*

GLVIA3 Glossary definition (page 157) defines ‘**Landscape**’ as... *“An area, as perceived by people, the character of which, is the result of the action and interaction of natural and/or human factors.”*

GLVIA3 Glossary definition (page 157) defines ‘**Landscape Character**’ as... *“A distinct, recognisable and consistent pattern of **elements** in the **landscape** that makes one landscape different from another, rather than better or worse.”*

The Council considers that the applicant should be asked a simple question in relation to their assessment of landscape fabric, as follows...

‘Is the term ‘Landscape Fabric’ as applied within the applicants LVIA interchangeable with the term ‘landscape Element’ as defined in the GLVIA3 Glossary (page 156)?

If the answer is **YES**, then the Council views the LVIA’s separate assessment and conclusions on ‘landscape fabric’ represents a partial and incomplete assessment of landscape elements (fabric) as it only includes some natural elements which does not give a full or transparent narrative or assessment of the physical direct change effects for all relevant landscape elements, including man-made and perceptual aspects which may influence character. The LVIA should include within its separate assessment of fabric components, all elements, both natural and manmade, existing and introduced into the landscape within the DCO order limits / study areas, to help the ExA understand the direct tangible landscape effects attributable to the proposed development during construction, operation and decommissioning stages.

If the answer is **NO**, then the Council questions why the LVIA hasn't carried out a credible separate assessment of resulting tangible change effects for landscape elements. The Council does not consider that the LVIA robustly assess or seeks to quantify these changes within its separate narrative and assessment of landscape character.

WC-005 - The applicant's comments help further illustrate the Council's point about conflating separate assessments of landscape elements (Fabric components) with the separate assessment of landscape character i.e. the comment is themed under landscape fabric assessment, but the applicant's response references the intention to carry out further assessment of landscape character.

To be clear, the Council has consistently sought a transparent assessment with a clear and well considered narrative of the direct tangible physical changes to all landscape elements within the DCO sites or otherwise impacted by the development proposal, whether that be from direct losses, new additions, or other changes such as through changed management prescriptions. This assessment should incorporate both natural and manmade elements, including any relevant perceptual change aspects which could influence character, these tangible changes should be measured and quantified from existing baseline conditions where possible. The Council considers that a further assessment of landscape character is not a helpful substitute to help the ExA understand the direct and indirect landscape change effects for landscape elements impacted within the DCO order limits and study area.

WC-006 to WC-010 - The Council maintains its opinions in relation to Landscape Fabric and has no further comment to make.

The Cotswolds National Landscape

WC-011 to WC-017 - The Council's position is clear on the points raised in relation to the setting of the CNL; effects on the Special Qualities of the CNL and Furthering the CNL purposes. The Council has no further comments to make at this stage.

Landscape Character

WC-018 - No further comment.

WC-019 - In response to (ISH2), Action Point-16 **[EV8-010]** the Council has produced plans showing the possible reduction in solar installations close to the village of Norton to reduce the potential impact on the landscape setting of, and approaches to the village. The applicant's response does not change the Council's opinion on the setting of the village of Norton.

WC-020 - The Council wishes to confirm its position in respect of the introduction of secondary hedging at gate entrances and has made its reasoning clear. The Council, therefore, disagrees with applicant's response on this matter.

WC-021 - The Council's opinion on this matter is clear and has not been changed by the applicant's response.

WC-022 - No further comment.

WC-023 - Please refer to separate detailed comments provided further below, by the council included for **[REP5-103] 9.60 Limestone Lowlands Character Assessment**.

Visual Impact

WC-024 - Please refer to comments under **[REP5-078] 7.15 Outline Soil Resources Management Plan (Rev 4) Tracked**, response above.

WC-025 - The Council welcomes the applicant's intention to undertake sequential intra-project visual assessments of the routes proposed in Appendix D of **[REP4-092]**.

WC-026 - No further comment.

Design and Parameters

WC-027 to - No further comment.

WC-028 - No further comment.

WC-029 - No further comment.

WC-030 to WC-031 - The council notes the applicant's response in relation to the outstanding previously requested additions/changes to Work No. 6 and Work No. 8a & 8b **[REP4-043] Design Principles and Parameters**, within the updates now incorporated into the **Outline Construction Traffic Management Plan [REP4-057]** below;

“Section 6.4 of the Outline Construction Traffic Management Plan [REP4 057] was updated at Deadline 4 to state, “Any edge restraints required to form or retain surface materials at access points to the Solar PV Sites, the BESS and Substation will be laid to finish flush with adjacent road levels to avoid creation of uncharacteristic upstands”. In addition, Section 6.4 of the Outline Construction Traffic Management Plan [REP4-057] was also updated at Deadline 4 to state, “Where existing sections of roadside hedgerows or dry stone walls are necessary to remove to facilitate the temporary creation of highway visibility splays and widened access to accommodate AIL's, the removed sections of hedgerow or drystone wall shall be replanted or reconstructed on existing alignments following completion of any temporary works, and on new adjusted alignments along the back edge of the required visibility splays for any permanent works.

The Council is unclear, as to why some of the councils' previous requests have been incorporated into the **Design Principles and Parameters** document **[REP4-043]**, while others are incorporated into the **Outline Construction Traffic Management Plan [REP4 057]** as there is no explanation within the applicant's response explaining the different approaches taken.

WC32 to WC-033 - No further comment.

WC-034 - Please refer to comments provided under **[REP5-078] 7.15 Outline Soil Resources Management Plan (Rev 4) Tracked** response above.

WC-035 - The Council acknowledges the applicant's commitment to ensure that there is no woodland edge tree loss or drystone wall removal at Grittleton Crossroads.

WC-036 - The Council confirms its concerns regarding the colouration of infrastructure components in the landscape and is not reassured that these will be of a muted, non-reflective finish, which is compatible with the need to ensure that the visual impact of these components is minimised. Additionally, the Council has concerns that the bunding and acoustic fencing around the BESS will in itself be unacceptably prominent. It will require suitable screen planting at an early stage to rapidly reduce the potential visual impact.

WC-037 - No further comment.

ISH2 - Action Points

WC-038 – Wiltshire Council provided a deferred response to (ISH2)- Action Point 2, within its **Wiltshire Council Comments on Submissions Received at Deadline 4 [REP5-113]**, at Deadline 5 **[REP5-113]** Section 31, Para's 31.1 to 31.7 (pages 52-52).

WC-039 – (ISH2) Action Point 6. Refers to Outline Decommissioning Strategy Rev3 [REP3-097] and DCO (Rev3 [REP3-006]). See below for responses.

WC-040 – (ISH2) Action Point 6. The Council confirms its requirements at Paragraphs 3.3 to 3.5 and notes the applicant's comments.

WC-041 – (ISH2) Action Point 6. The Council confirms its requirements at Paragraphs 3.6 to 3.9 relating to signing off the decommissioning works (Section 6.3 Management Review). The applicant's response has not adequately addressed this issue.

WC-042 - (ISH2) Action Point 6. The Council confirms its request with Requirement 20 for a decommissioning report and certificate of completion for its approval

WC-043 - (ISH2) Action Point 7. The Council does not consider that applicant's response answers its concern in relation to existing field ditches and potential conflict with any parallel hedgerow widening proposals, such as adjacent to existing, largely single species Elm hedgerows.

WC-044 - (ISH2) Action Point 11. The Council maintains its opinion in relation to this point (reference to best practice standards) and considers that the information requested should be referenced and incorporated, in particular for the project's operational phase.

WC-045 - (ISH2) Action Point 13. The Council has provided further comment in relation to how it considers the s.85 Duty of

the CRoW act should be applied to further the statutory purpose and function of the CNL designation within it's **Post hearing submissions [REP4-092] (ISH2) Section 2, para's 2.27 – 2.32**. The Council has nothing further to add.

WC-046 - (ISH2) Action Point 16. No additional comment. Plans WHL-WCC002-02 and WHL-WCC002-03 submitted July 2026 **[REP4-092]** Appendix C.

WC-047 - (ISH2) Action Point 19. No additional comment. Plan WHL-WCC002-04 submitted July 2026 **[REP4-092]** Appendix D.

18. 9.57 Imagery of Legacy Landscape

- 18.1. The Council notes the inclusion of additional photomontages to illustrate how the legacy landscape may look after 60 years, from seven representative viewpoint locations (VP3, VP4, VP6, VP25, VP26, VP30 and VP31). While the Council welcomes and supports the applicant's intention to leave a positive, enhancing landscape legacy following decommissioning, there is of course no guarantee that the legacy landscape presented within these photomontages will look like this at the end of 60 years. The Legacy landscape will depend on effective establishment of planting and ongoing management for the life of the project, including effective monitoring and adaptive management measures, and noting retention of some beneficial landscape enhancement components would be at the final discretion of individual landowners in combination with environmental protections in force at the time of decommissioning.

19. 9.60 Limestone Lowlands Character Area

Action Point 14 states: Provide an assessment of how the Limestone Lowland landscape type and its sub-divided Landscape Character Areas would be affected including reference to the: - key characteristics; - Inherent landscape sensitivities; and - broad management objectives.

Action Point 15 states: Provide an assessment of how the key characteristics of the relevant landscape character types (Limestone Lowland and Hullavington Rolling Lowland) would be impacted by cumulative developments. Explain whether the key characteristics of the character types would be so changed by the cumulative developments as to transform it into a different landscape type.

Wiltshire Council considers that Action Points 14 and 15 are clear in their requirements and that there is no logical reason for the Applicant to change the action requirements and effectively over-complicate what are relatively straightforward actions.

Mitigation

1.2.3 As discussed throughout the examination procedure Wiltshire Council does not have confidence that the applicant has followed the principles for mitigation set out in the relevant Landscape Character Assessment Guidance. For example, Hullavington Rolling Lowland LCA8 Management Guidelines at 4.145 states: *The overall objectives for the area are to conserve and enhance its pastoral character, and to ensure that any new development respects the grain of the dispersed settlement in the area and the vernacular building materials.* This does not indicate that the wholesale industrialisation of the receiving landscape is by any means going to be acceptable.

1.2.6 The issue of whether the proposed mitigation will be suitable following decommissioning has been previously discussed at length with some of the mitigation proposals e.g. growing hedges to 4.5m being inherently unsuitable for the receiving landscape. The commentary at 1.2.6 is once again confusing mitigation and enhancement.

1.2.7/1.2.8 The issue of the setting of the CNL remains unresolved with there being stark differences of opinion as to what areas fall within the setting of the CNL. The Council's reasoned opinion is that all land to the north-west of the Fosse Way shares characteristics and permeability with the CNL and therefore is within its setting. Therefore, the landscape proposals which are here shown as mitigation and are in fact enhancement which do not adequately address the issues relating to the location of solar arrays within the CNL setting.

1.2.9 The Council disagrees with this statement on the basis that the proposal is not landscape led, as if it were, the applicant would have recommended not to work to establish solar arrays within the setting of the CNL. This was discussed previously at 'Wiltshire Council Comments on Submissions Received at Deadline 2' (15th June 2026) [REP3-141], Para 5.4.

Effects on the Host LCA 8: Hullavington Rolling Lowland Character Area

Key Characteristics (where pertinent)

Patchwork of irregular, medium sized fields, mainly pasture, and larger more recent enclosures used for arable, especially on the richer soils.

The description of effects fails to mention the industrialisation of the landscape as a result of the proposed development and the ancillary works. The fields will not be either pastoral or arable; there will be accesses and hardstanding; BESS; substations, other substantial infrastructure; extensive soil storage and fencing to consider, much of which has not been assessed as yet. Thus, Wiltshire Council considers that there is a gross misrepresentation of the effects of the proposed development on this key characteristic.

Continuous hedges with many mature oaks.

The response fails to mention the extent of hedgerow removal. Also, it includes information which bears no relevance to this key characteristic.

Fine stone villages with muted colours and dispersed farms.

There are five villages within/associated with the Scheme area along with dispersed farms and isolated dwellings. They form a key characteristic of the landscape and thus a key component of the receiving landscape. This built form clearly part of the fabric of the receiving landscape, although the applicant does not include built form as landscape fabric in the LVIA. In response to (ISH2), Action Point-16 [EV8-010] the Council has produced plans showing the possible reduction in solar arrays and infrastructure close to the village of Norton to reduce the potential impact on the landscape setting of, and approaches to the village.

Unfortunately, the assessment of landscape effects on this key characteristic has relied heavily on visual assessments and has clearly confused the two in its analysis, particularly in respect of Hullavington. Therefore, the Council does not consider the assessment has adequately analysed the potential landscape effects on this key characteristic and does not agree that there are only localised indirect effects on the five villages. No assessment of the landscape effects on dispersed farmsteads has been undertaken.

Description of Effects

Value, Susceptibility and Sensitivity: Paragraph 8.3.52 of ES, Vol 1, Chapter 8 [APP-060] quotes The Wiltshire Council Renewable Energy Study Landscape Sensitivity Assessment 2023 as stating: “*Landscape sensitivity to these very large schemes would be categorised as “high” sensitivity regardless of location, requiring developers to pay particular attention to this issue in their specific applications*”. Therefore, as the site has an accepted ‘High’ Receptor Value and a ‘High’ Sensitivity, its Susceptibility to the change proposed can only be ‘High’. The matrix does not allow for downgrading this by ignoring key components of the Landscape Fabric. The downgrading of the Sensitivity of the landscape to Medium in the assessment is not considered acceptable.

Magnitude: The Magnitude of change on the landscape character resulting from the proposed development has been grossly underestimated and has not considered the large areas of earthworks, spoil storage and areas of panels and associated infrastructure. There will be extensive and wide-ranging changes to the landscape components and the landscape character introducing an industrialising 9.5km wide industrialising swath of large-scale solar PV/BESS development across almost the entire width of the ‘Hullavington Rolling Lowland’ and ‘Malmesbury-Corsham Limestone Lowland’ Landscape Character Areas.

Throughout the project the nature of effect will remain Adverse in the Council’s opinion.

Effects on the Host LCA 16A: Malmesbury-Corsham Limestone Lowlands

Key Characteristics (where pertinent)

Peaceful rural landscape.

There will be significant effects on the rurality of the receiving landscape and the tranquillity of the landscape and the fact that the development is described as disaggregated/dispersed in nature means that the adverse effects will be spread over a wide area. They will not be confined to construction as suggested and will include significant adverse effects during the developments’ operational/maintenance and decommissioning phases.

Strong network of hedgerows, hedgerow trees and occasional woodland copses.

The response fails to mention the extent of hedgerow removal. Also, it includes information which bears no relevance to this key characteristic.

Remaining areas with medieval field pattern.

The assessment states that: *Land use will change from arable agricultural farmland to solar arrays above grassland. This, as well as associated infrastructure including fencing, access tracks, BESS and substations will have a notable change on land use.* The Council accepts this as an

accurate description of the effects of the proposals on the fields. However, it is concerned that this does not accurately transfer to the assessments.

Description of Effects

Value, Susceptibility and Sensitivity: Paragraph 8.3.52 of ES Chapter 8 [APP-060] quotes The Wiltshire Council Renewable Energy Study Landscape Sensitivity Assessment 2023 as stating: “*Landscape sensitivity to these very large schemes would be categorised as “high” sensitivity regardless of location, requiring developers to pay particular attention to this issue in their specific applications*”. Therefore, as the site has an accepted ‘High’ Receptor Value and a ‘High’ Sensitivity, its Susceptibility to the change proposed can only be ‘High’. The matrix does not allow for downgrading this by ignoring key components of the Landscape Fabric. The downgrading of the Sensitivity of the landscape to Medium in the assessment is not considered acceptable.

Magnitude: The Magnitude of change on the landscape character resulting from the proposed development has been grossly underestimated and has not considered the large areas of earthworks, spoil storage and areas of panels and associated infrastructure. There will be extensive and wide-ranging changes to the landscape components and the landscape character. Throughout the project the nature of effect will remain Adverse. These comments apply equally to the resulting effects corresponding to the host Landscape Character Type and Landscape Character Area’s.

Cumulative Landscape Effects

It is important to reiterate the Wiltshire Council Renewable Energy Study Landscape Sensitivity Assessment 2023 guidance (as also detailed above) which states: “*Landscape sensitivity to these very large schemes would be categorised as “high” sensitivity regardless of location, requiring developers to pay particular attention to this issue in their specific applications*”. This equally applies to the assessment of cumulative landscape effects. Whilst cumulative effects are different to the Landscape character effects discussed above, and are a higher level of assessment, they should include: changes on the fabric of the landscape, the aesthetic and perceptual aspects of the landscape, and the overall character (GLVIA3 para 7.25). Thus, the cumulative effects ultimately result in the judgement as to whether the landscape character has changed to such an extent that it becomes a new landscape type or sub-type (GLVIA3 para 7.26).

Unfortunately, the applicant has muddled visual and landscape characteristics in their assessment. To achieve an accurate assessment, cumulative visual effects should be considered as a totally separate exercise.

Due to the disaggregated nature of the proposed development sites and long cable route corridor, both intra-project and inter-project cumulative effects have been assessed, which is welcomed. It is accepted that the cumulative landscape effects are likely to be lower than those assessed in the landscape assessment and LVIA, but this is to be expected as the analysis is based on

different assessment criteria. However, the Council maintains its stance that the value, susceptibility and sensitivity have been consistently downplayed, leading to a general under-assessment of the level of effect.

Conclusions

The Assessment considers that there are Moderate/Minor Adverse (non-significant) effects recorded across the receiving/host LCA8 and Minor Adverse (non-significant) recorded across LCA 16A and the attendant LCTs. The Council considers that there has been a consistent downplaying of the level of effect throughout the LVIA and this assessment.

The Council does not agree that the dispersed nature of the sites supports their assimilation into the receiving landscape, it merely spreads the effects over a much larger area and affects more receptors.

The scheme is not entirely reversible without considerable earthworks, infrastructure removal and disruption of the receiving landscape. Parts are overlaid but a large proportion relies on excavation and hardstanding plus spoil storage.

The Council is not convinced that the existing framework of vegetation will ensure that the development sits comfortably within the landscape. The extent of the structures across hundreds of hectares with their attendant infrastructure, hardstanding and spoil storage will have a considerable adverse effect on the character of the receiving landscape.

The assumed benefits of mitigation have once again confused mitigation and enhancement.

Biodiversity Net Gain is deliverable but is a matter for the ecology specialists to agree.

The Legacy Landscape objectives which seek to deliver greater species variety, greater age variation of woody plants, enhanced landscape structure, improved resilience to pest and disease and climate change and reinforcement of local landscape character where appropriate, within the sites are of course welcomed and supported by the Council.

While there can be no planning certainty that the legacy landscape presented within the illustrative photomontages [REP5-100] will be delivered at the end of 60 years, given landscape legacy effects will very much depend on the effective establishment and ongoing management of the planting for the life of the project. The legacy landscape will also be at the final discretion of individual landowners and environmental protections in force at decommissioning. However, it is also accepted by the Council, that with successful establishment and good management of planting including retention by landowners following decommissioning, then the legacy landscape could look similar to the representative legacy landscape photomontages [REP5-100]. The issue is one of certainty. The Council considers effective monitoring with adaptive management measures could help to increase levels of certainty to help achieve a beneficial legacy landscape.

The Council considers that long-term beneficial landscape effects are important for the project to deliver considering the projects long lifespan and

the corresponding agricultural land use change, lasting for up to 60 years. This is because the changed land use will exclude landowners, farmers and land managers from future funding streams, which might otherwise be open to achieve similar or possibly even better landscape outcomes through participation in Higher-Level Stewardship, Environmental Land Management schemes, or other Agri-environment or Agri-forestry schemes that will likely emerge over the next 60 years.

Transformation of the Landscape

Wiltshire Council considers that, despite the proposed screening of the various built elements of the Lime Down proposals, screening will not be 100% effective in all instances for all receptors, which the Council believes the applicant accepts. The Council's view is that the receiving landscape will become significantly industrialised as a result of the Cumulative Landscape Effects of Lime Down and other solar related developments within the area. Wiltshire Council's opinion is that the development of solar installations across the DCO area and its surroundings, will result in significant changes to the key characteristics and peoples' perceptual experience of the receiving landscape.

In the Council's view these changes are unlikely to result in the designation of an entirely new Landscape Type, as many characteristics will remain, but could require the designation of a new Landscape Sub-Type or Landscape Character Area, based on the preponderance of solar array and BESS development within the agricultural landscape.

20. 9.62 Equine Business Report

Wiltshire Council would like to thank the applicant for this report, which does highlight the importance of the equine sector to the rural economy, and recognises the clustering of training and breeding activities within the 5km study area and the surrounding area. It also notes existing financial pressure on the sector with cost increases on the businesses and cost of living pressures on participants which may lead to less demand.

We are grateful that the applicant has completed the survey of equine businesses but are disappointed by the small number of responses. This may be due to the tight timescales the recipients had to respond and/or due to some of the information that was requested.

Wiltshire Council still has a number of concerns:

- Dust – we note the mitigation measures the applicant is putting in place and welcome the opportunity to request to see the logs of on-site and off-site dust inspections. However, bearing in mind the restriction on construction activity when the soil is waterlogged which means most construction activity will occur

over the summer months, and the increasing prevalence of long, hot and dry summers we feel this will still be an issue.

- As has been noted, horses are very sensitive to unexpected changes in their environment and are well known for their flight response to unexpected noise. (There have been a number of widely reported incidents in London with well trained, military horses for instance) We appreciate the mitigation measure that will be put in place and the proposed dialogue with equine businesses but still feel there is the possibility of horses being frightened which could lead to injury to both horse's and staff/rider, depending on the situation. There have been representations stating that blacksmiths have stated they would not attend during the construction phase for this reason.
- We are concerned to read that all the [REDACTED] Yatton Keynell will have to be relocated while the cable is being installed. We would like to know if compensation is being negotiated with the business owner.
- 3.4.2 – possible typo as text includes t Error! Reference source not found..
- Jobs and Economic Impact– the applicants estimate of up to 340 FTE jobs supported by the equine sector within 5km of the scheme is a significant number, as is the estimated up to £11m contribution to GVA. Any business closures in the area would have a adverse impact on the economy of the local area. When you add the up to 750 jobs and up to £35m GVA from the wider supply chain the economic importance of this sector to the economy becomes apparent.
- The case studies supplied by the applicant do provide some re-assurance. With these in mind, and the confident assertion by the applicant that the economic impact on the equine sector during the lifetime of this scheme and during the construction phase will be minimal, we see no reason why the applicant would not agree to a business compensation scheme as has been proposed.

21. [Blank]

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25. [Blank]

26. Stop Lime Down D5 Response

CH2.3: Direct Impact on the Fosse Way – Page 030:

Any such impacts would be mitigated by any such sites either being scoped out of the development or 'preserved by record' via a series of mitigation excavations, or by the spacing of solar panels away from isolated features.

The Fosse Way will still be visible in the landscape following development and will still be a navigable road.

27. APP-230 Outline Archaeological mitigation Strategy – Page 119 – Para 3.1.156

- 27.1. No excavations are proposed on the Scheduled Monument in Field 120. The cable route will not impact this monument.

Para 3.1.158 & 159:

A program of public outreach will be part of the archaeological works carried out ahead of construction. No HDD is currently proposed in Field 120. A program of Strip, Map and Record excavation will be conducted during topsoil stripping of the cable route, well away from the Scheduled Monument.