

Lime Down Solar Park

**Planning Inspectorate Reference:
EN010168**

**Wiltshire Council Comments on Submissions
Received at Deadline 6 and Deadline 6B**

Deadline 7 (2 October 2026)

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1. 7.21 Outline Battery Safety Management Plan (Rev 3) **[\[REP3-107\]](#)**

- 1.1. The LLFA considers that the Outline Battery Safety Management Plan must include:
- (a) calculation of containment volume as the greater of the firefighting water volume in the approved battery safety management plan plus the 1 in 100 year plus 45% climate change 6-hour rainfall on the compound, with 10% freeboard;
 - (b) impermeable base, bund or kerb containment and sealed drainage with normally-closed isolation;
 - (c) automatic isolation on fire detection;
 - (d) sampling, testing and disposal protocol for retained water;
 - (e) location outside Flood Zone 3b and above the 1 in 100 year plus 71% climate change flood level; and
 - (f) commissioning test and annual integrity test procedures.
- 1.2. Furthermore, the BESS must not be energised until the containment has been tested and certified in accordance with the approved plan, and the plan must be implemented for the lifetime of the BESS.

2. 7.4 Design Principles and Parameters (Rev 4) [\[REP4-044\]](#)

- 2.1. The LLFA considers that details of fencing, gates and other means of enclosure located within Flood Zone 2 or 3, within the functional floodplain identified in the approved hydraulic model, or within a surface water flow route identified in the approved drainage strategy, must be submitted to and approved by the relevant planning authority in consultation with the Environment Agency and the lead local flood authority. Such fencing must be of post-and-wire construction with no mesh, boarding or other impediment to flow within 0.6 m of ground level, or must incorporate hinged flood flaps, and must not include solid barriers across any modelled flow route. The fencing must be inspected and cleared of debris following each Environment Agency Flood Alert and each rainfall event exceeding 30 mm in 24 hours, and a record kept under the operational environmental management plan.
- 2.2. Furthermore, the details submitted must demonstrate that (a) the BESS Area, each substation and each conversion unit is located outside Flood Zone 3b and outside the 1 in 100 year plus 71% climate change flood extent shown in the approved hydraulic model, with finished floor or plinth levels not less than 0.6 m above the 0.1% annual exceedance probability plus climate change level; (b)

no part of the Lime Down C1 substation is located within the exclusion zone shown on the Works Plans (Field C33); (c) the lowest edge of any solar panel within an area at risk of flooding from any source is not less than 0.6 m above the design flood level derived from an assessment accepted by the lead local flood authority; and (d) a post-development hydraulic model run has been approved by the relevant planning authority in consultation with the Environment Agency and lead local flood authority showing no increase in flood level outside the Order limits.

3. 9.59 Mitigation Route Map [[REP5-102](#)]

- 3.1. The council requests that the Landscape and Ecology Mitigation Plans (Figures 3-4-1 to 3-4-5.2) are added to the list at paragraph 3.1.3, as a relevant securing mechanism. This is because these are currently the only plans which spatially convey the mitigation proposals, and which the council considers to be key documents to understand the mitigation / enhancement proposals and inform subsequent detailed submissions. While the council notes that these Landscape and Ecology Mitigation Plans are currently referenced from within the oLEMP, the council considers that a more direct route could be signposted from within the Mitigation Route Map if they were included as additional bullet points.
- 3.2. The council also highlights a small continuity issue. The 'Landscape and Visual' table 3-2 (page 22) identifies offset from fence to panel as a minimum 4 metres, while the ecology table 3-3 (page 36) identifies a minimum of 3 metres. The council suggests these should be the same 4m minimum standoff distance.
- 3.3. Furthermore, within the 2nd column of the landscape and visual table 3-2; there are references (seemingly incomplete or redundant) to "At least one of (10m)" at page 20 and 21 [[REP5-102](#)]. The council considers that these should either be removed or completed.
- 3.4. Additionally, at page 23, the council suggests that following the Applicant's decision to remove panels / infrastructure from the whole of Field A1, following their latest discussions with CNL, that the reference to just 'the northern part of A1' requires revision to the whole of Field A1.
- 3.5. In consideration of the council's response to ExQ2 [[REP5-112](#)] and aspects raised at the Hearings, the council considers that the Mitigation Route Map should be amended to include reference to the monitoring and adaptive management provisions required to be incorporated into the outline management plans.
- 3.6. Furthermore, the LLFA's required changes to the Mitigation Route Map are contained in Appendix A to this submission.
- 3.7. The council also requests that the further changes requested to the individual outline management plans within this submission are incorporated into the Mitigation Route Map.

4. 9.62 Equine Business Report [[REP5-105](#)]

4.1. In light of recent information since the council commented on this document at Deadline 6 [[REP6-069](#)] and as a result of the ISH8 hearing on 22 September 2026 where the impact on equine businesses was discussed, Wiltshire Council would like to make further comments on this report:

- To help prevent different recollections of events should an incident occur with a vehicle associated with the Applicant and a member of the public, pedestrian, cyclist, horse rider, other vehicle etc., the council requests that all vehicles associated with the Applicant be fitted with cameras and speed tracking devices to help prevent vexatious claims.
- The council has seen evidence that an insurance broker would view the construction period of the project for any business in close proximity to the works to be a 'material change to the risk insured' under the policy. For the avoidance of doubt, insurers reserve the right, following notification of the proposed development, to:
 - continue cover on the existing terms;
 - impose additional terms, conditions or premium;
 - amend the scope of cover; or
 - decline to continue the insurance.

4.2. The council fears that equine business owners would not be able to get insurance or the cost of their policy would increase significantly as the Applicant is indemnified from insurance claims due to the terms of the DCO.

4.3. Following submissions from several equine businesses both at the hearing and via representation, the council has significant concerns that many of the existing businesses could become unviable. This is because owners of valuable horses would be unlikely to place those horses in a stud or livery during the construction phase due to the perceived risk to the animal, despite the mitigation measures the Applicant is proposing to put in place.

5. 9.63 Permitted Preliminary Works Environmental Management Plan [[REP5-106](#)]

5.1. It is noted that the PPWEMP [[REP5-106](#)] does not comprise an outline version at present and that paragraph 1.1.5 of the plan states:

"It should be noted that, unlike the Outline plans noted above, this PPW Environmental Management Plan (EMP) is a detailed plan and a certified document under Schedule 13 of Article 42 of the draft DCO. As this is a detailed plan, no approval mechanism is necessary under the Requirements."

- 5.2. It is the council's view that there should be an approval mechanism for this Plan subsequent to the DCO determination process, and that the document should be amended to constitute an outline document with the requirement for a final version to be submitted to the council for the purposes of obtaining approval prior to the commencement of PPW, as part of a requirement in the Development Consent Order.
- 5.3. The controls set out within the PPWEMP, including the appointment of an Ecological Clerk of Works (EcoCoW), are noted. However, given the indication in paragraph 2.4.1 that pre-commencement ecological surveys will be undertaken in accordance with the method statements (MS) detailed in the Outline EPMS, and that these MS cover "*all pre-commencement surveys and seasonal constraints relating to habitat removal (which may be undertaken in small quantities during PPW)*", it is the council's view that [\[REP5-106\]](#) should be treated the same as the cross-referenced EPMS and the other management plans, and should therefore be submitted as a detailed iteration for council approval prior to commencement of PPW. This is especially the case given that the MS detailed in the EPMS are being relied upon for the PPW.
- 5.4. A further rationale for requiring an approval mechanism for a final iteration of [\[REP5-106\]](#) prior to commencement of PPW, is that whilst paragraph 2.1.6 is noted, it is evident that the PPW will entail works which could necessitate ecological survey that has not been undertaken to date to inform the DCO application, and for which licences could be identified as being required. This could include surveys of trees with potential to support roosting bats (namely trees with potential roost features (PRFs)) that are proposed for removal or modification during PPW, as detailed in Table 3-3. The council has highlighted in previous representations that the DCO application has not been supported by the results of such survey to date.
- 5.5. As such, it is the council's view that a detailed version of the PPWEMP that provides more detail than the current version (which the council considers should be treated as an outline), should be submitted for approval as a DCO requirement / planning condition. The detailed version should include full details of the ecological surveys planned to facilitate PPW, including where survey will be undertaken (for example, a plan denoting trees to be subject to survey), accompanied by the survey methodology.
- 5.6. In addition, it is noted that in Table 3-3, it is stated that: "*Further surveys for protected species may be conducted as required,...*" and that such surveys "*would be completed as appropriate to reconfirm the status of protected species identified, to inform mitigation requirements and support protected species licence applications, if required, and the requirement for any EcoCoW supervision during the PPW.*"
- 5.7. The council would ask the ExA if there is scope for a further mechanism to be added to necessitate the provision of the results of further ecological survey conducted prior to PPW to the council, together with the provision of any proposed mitigation strategy necessary. This is requested in order to provide the council with suitable opportunity to comment on proposed mitigation and

compensation measures *before* any such measures are implemented and *before* mitigation licence applications are submitted to Natural England (where necessary). This is particularly pertinent given that it is evident that there are likely to be some surveys ecological surveys undertaken which have not been conducted to date, despite comments made by the council at the PEIR stage and prior to and during the Examination of the draft DCO regarding the scope of protected species survey.

- 5.8. Furthermore, with regard to sub-section 2.8 'Traffic Management', Paragraph 2.8.1 states that "*During PPW, the appointed contractor(s) will ensure that the impacts from works-related traffic on the local community (including local residents and businesses and users of the surrounding transport network) are minimised, where reasonably practicable, by implementing the measures set out in Table 7 below*". However, there is no Table 7 in the document, so it is assumed this should read Table 3-7 'Transport and Access'.
- 5.9. It is noted Paragraph 2.8.2 requires that the pre-construction Highway Condition survey required by the oCTMP must be completed prior to any preliminary works, which is acceptable to the council.
- 5.10. With regard to sub-section 2.9 'Parking Provision', Paragraph 2.9.1 states that "*The temporary compounds for the PPW will include parking areas. These parking areas will **not** be aggregate, and vegetation will be cleared and fencing established for these compounds*". The council queries whether the inclusion of the word 'not' is correct and, if so, how are these temporary compound areas to be treated to prevent the surfaces breaking up and mud / detritus being carried onto the highway. Further detail is necessary.
- 5.11. With regard to Table 3-7 'Transport and Access' and specifically with respect to 'Specific Highway Measures', it is stated that "*Existing accesses will be utilised. No new accesses off the public highway will be established*" and "*The Offsite Highway Improvement Areas will not be implemented as part of the PPW*". This infers that existing field gate accesses to be used for PPW are wholly suitable for accommodating HGV trafficking without 'any' improvements. The PPWEMP doesn't specify which existing accesses will be used, so it could be any of them. The concern here will be any buried services under these existing field gate accesses, and possible underlying piped culverts linking drainage ditches either side. Whilst it may be the case that the existing accesses are used now by occasional agricultural vehicles, the intensified use by HGVs may require the depth of services to be reviewed and / or any shallow culverts strengthened irrespective of any delay in the highway access improvements proposed in the Transport Assessment and detailed design still to be agreed. It is also noted that any PPW HGV trafficking is intended to proceed any HIA works, so passing bay mitigation deemed necessary to accommodate 2-way HGV movements won't be in place at this time. Whilst it is accepted this phase precedes any part of the main works, the council queries what level of HGV trafficking linked to the PPW is forecast and for how long, as nowhere is this stipulated. It is noted that some of the operations falling under PPW in paragraph 2.1.2 'could' still result in HGV movements of significance so:

- *Above ground site preparation for temporary facilities for the use of Contractor(s)*
- *Remedial work in respect of any contamination or other adverse ground conditions*
- *Site clearance (including vegetation removal, demolition of existing buildings and structures (and any associated infrastructure) and removal of existing plant and machinery.*

5.12. Furthermore, the referencing to the Pre-Condition Highway Survey extent is outdated and is not consistent with that set out in the latest oCTMP. The latter advises the extent required is as follows:

Lime Down A-C

- *The length of Alderton Road and Fosse Way between Grittleton crossroads and junction of Fosse Way and Unnamed Road to Sherston.*
- *Unnamed road between Fosse Way and Sherston: Circa 1.1km from the Fosse Way junction; and*
- *Un-mettalled highway surfaces forming part of the construction route on Fosse Way.*

Lime Down D

- *Unnamed road between the roundabout junction with Wellington Place Road and Bradfield Cottages - circa 1.7km*
- *Unnamed road between the Bradfield Cottages / The Street junction and the proposed secondary access point to Lime Down area D – circa 460m*
- *Un-mettalled highway surfaces forming part of the construction route, east of Hullavington crossroads; and*

Lime Down E

- *Unmetalled highway surfaces located on construction routes adjacent to Lime Down E.*

5.13. The PPWEMP should be amended for consistency with the oCTMP.

5.14. From an LLFA perspective, the document contains appropriate commitments relating to baseline monitoring, water quality controls, pollution prevention measures, flood response arrangements and groundwater protection. Given that site-specific methodologies, monitoring locations, trigger levels and management responses will necessarily evolve as preliminary investigations, surveys and detailed design progress, the LLFA considers it appropriate that a final detailed document should be approved prior to implementation.

5.15. The LLFA also considers that the detailed document should contribute to the wider hydrological monitoring and management framework for the Scheme. In addition to water quality and groundwater protection, the detailed plan should demonstrate how hydrological risks associated with permitted preliminary works will be identified, assessed and managed, particularly where

investigations, vegetation disturbance, temporary access arrangements or site activities have the potential to affect runoff behaviour, infiltration performance, drainage pathways or watercourse receptors.

- 5.16. This would provide confidence that the detailed hydrological, groundwater and water quality controls reflect the findings of the preliminary investigations and are appropriately integrated with the wider management framework secured through the CEMP, SRMP, LEMP, OEMP and Water Management Plan.
- 5.17. The LLFA also considers that the detailed document should contribute to the wider Strategic Hydrological Monitoring and Verification Framework for the Scheme. In addition to water quality and groundwater protection, the detailed plan should identify any hydrologically sensitive locations affected by permitted preliminary works and establish how hydrological risks associated with vegetation disturbance, soil disturbance, temporary access arrangements, overland flow routes and drainage pathways will be identified, assessed and managed. Particular consideration should be given to ensuring that preliminary works do not create disproportionate runoff risks prior to implementation of the wider drainage, soil management and vegetation establishment measures secured through the main management plans.

6. 9.68 Technical Note on Impacts to Non-Equine Businesses [[REP5-111](#)]

- 6.1. Wiltshire Council considers this document, whilst being a useful summary of the Applicant's previously stated position and interactions to date, does not address the concerns that the council and others have raised regarding the impact of the scheme on local businesses. Having said that, the council does understand that the Applicant is trying to arrange meetings with some of the businesses, the outcome of which may influence our position.
- 6.2. The council welcomes the mitigation measures the Applicant is proposing, in particular the commitment to setting up a Community Liaison Group to inform the local population of works taking place in their locality at specific times. The council awaits sight of the terms of reference for this group to have a better understanding of how it would communicate the project's work schedule to affected parties during the construction phases of this project.
- 6.3. Furthermore, with regard to section 4.4.12, in a meeting with the Applicant following deadline 2, Wiltshire Council, in response to comments made by the Applicant, agreed that a business would have to show a reduction of income of 30% during construction, decommissioning and for one year following completion of these events. Discussions remain on-going.

7. 3.1 Draft Development Consent Order (Rev 6) [[REP6-006](#)]

- 7.1. The council maintains that additional clarity is required with respect to the definition of 'maintain'. It is suggested that the definition is amended to state:

“‘maintain’ includes inspect, repair, adjust, alter, remove, refurbish, reconstruct, replace (including scheduled replacement within the parameters assessed in the environmental statement and secured by the documents certified under article 42 and the requirements) and improve any part of the authorised development and “maintenance” and “maintaining” are to be construed accordingly;”

- 7.2. The council considers that Article 9(3) should be deleted, or made expressly subject to Part 11 of Schedule 15 and the permit scheme's ordinary mechanisms. It is the council's understanding that the Applicant will amend Article 9(3) to make it clear that it is expressly subject to the dispute resolution mechanism contained within the Protective Provisions.

- 7.3. The council maintains that the four-week period in Article 16(5)(a) is insufficient. Therefore, Wiltshire Council is seeking an eight-week notice period, but suggests the addition of the wording *“unless a shorter period is agreed in writing by the traffic authority.”* This is a compromise on the council's standard 12-week period.

- 7.4. Wiltshire Council also considers that consent under 16(4)(b) should be expressly carved out from Article 47. The council requests the addition of the following wording as new Article 16(8): *“Article 47 does not apply to any consent required under article 16(4)(b).”*

- 7.5. Furthermore, it is the council's understanding that a cross-reference will be added within Articles 40 and 41 to ensure that the powers relating to hedgerows and trees are exercised consistently with the environmental management plans. The following wording will be included within both Articles:

“The powers conferred by this article must be exercised in accordance with the relevant environmental management plan approved under Schedule 2, having regard to the phase of the authorised development during which the works are undertaken.”

- 7.6. The council maintains its position, as initially set out within its Written Representation [[REP1-138](#)] and most recently within its response to ExQ2 DCO2.1 [[REP5-112](#)] and at ISH9, that the phasing plan should be submitted to and approved by the local planning authority in relation to Requirement 2. There is substantial precedent for the requirement for the phasing plan to be submitted to and approved by the local planning authority. This includes in the following made solar DCO's: Byers Gill Solar (2025), Cleve Hill Solar Park (2020), Little Crow Solar Park (2022), Longfield Solar Farm (2023), Mallard Pass Solar Farm (2024), North Lincolnshire Green Energy Park (2025),

Oaklands Farm Solar Park (2025), One Earth Solar Farm (2026), Springwell Solar Farm (2026), Stonestreet Green Solar (2025), Sunnica Energy Farm (2024) etc. Given the uncertainty with the two grid connection dates, the council wishes to make sure that the impacts to the community are minimised as much as possible i.e. by ensuring the construction programme is concise and not unnecessarily elongated and also that the construction is in line with the confirmed grid connection dates so the equipment is not erected and left until connection, i.e. to minimise adverse environmental effects.

- 7.7. Wiltshire Council has provided feedback to the Applicant on the draft Outline Terms of Reference for the Community Liaison Group (please see response to ISH7 Action Point 2 included in the council's separate submission at Deadline 7). The council considers that the CLG should operate during pre-construction, construction, for 5-years following final commissioning of the scheme (subject to any resolution from the CLG to curtail its operation) and during peak replacement activities. It should also be re-established for the decommissioning phase. The council also considers that the current Outline Terms of Reference for this group do not sufficiently capture the CLG's engagement on the detailed management plans and control documents prior to discharge.

- 7.8. As such, the council considers that Requirement 4 should be drafted as follows:

“Community Liaison Group

4. – (1) Prior to the undertaker submitting any written plan, scheme, details, strategy, or amendments to the relevant planning authority under any requirement of Schedule 2, a community liaison group must be established with an approved terms of reference.

(2) The terms of reference must be submitted to and approved by the relevant planning authority.

(3) The terms of reference must be substantially in accordance with the outline terms of reference.

(4) The community liaison group must be administered by the undertaker and operated in accordance with the approved terms of reference.

(5) The community liaison group will be in operation for five years following final commissioning of the authorised development (subject to any resolution of the community liaison group to curtail its period of operation), during peak replacement activities and at the decommissioning stage.

(6) Notwithstanding (1), the undertaker may submit any written plan, scheme, details, strategy, or amendment to the relevant planning authority under any requirement of Schedule 2, where the making of that submission is agreed with the relevant planning authority.”

- 7.9. The Wiltshire Council Archaeology Service (WCAS) consider a Detailed Archaeological Mitigation Strategy (DAMS) to be vitally important to determine the specifics of the required mitigation works at the earliest possible stage, rather than leave them to a point where permission for the development has

been granted. Without a DAMS, WCAS and Historic England won't have control over the amount and nature of archaeological mitigation to be carried out.

- 7.10. The Outline Archaeological Mitigation Strategy (OAMS) submitted by the Applicant is not of sufficient detail. The OAMS was a holding position until all the evaluation surveys (the geophysics and trial trenching) had been completed and acted as a stepping stone to the DAMS. Moving from an OAMS to Site Specific Written Schemes of Investigation (SSWSIs), as suggested by the Applicant, is flawed because a DAMS will include all mitigation not just the fieldwork.
- 7.11. The DAMS would set out a detailed methodology for the different types of archaeological mitigation that will be required across the whole site. The DAMS will go through each area / field within the redline boundary, including the cable route, and set out which type of mitigation is required i.e. scoping out, preservation in situ, excavation and the monitoring of groundworks, and set out the detailed methodology for each form of mitigation. The DAMS would clearly set out the roles and responsibilities of each stakeholder involved in the mitigation works, including consultants, archaeological contractors, construction crews, and other specialist contractors. The DAMS would also address mitigation for all access routes and construction compounds to be created away from previously identified archaeological sites and establish a set methodology for lines of communication for when archaeological remains of unexpected significance come to light. The DAMS would set out how many SSWSIs will be required across the proposed development footprint and establish a timetable for how these documents will be completed and released to allow sufficient time for review and approval by WCAS and Historic England.
- 7.12. To this end, the council would wish to see the wording of Requirement 12 section (2) altered to state:

'No part of the authorised development is to commence until the developer implements an approved Detailed Archaeological Mitigation Strategy (DAMS) to cover the scheme area, including the cable route and any associated infrastructure. This will be approved by the local planning authority's archaeological advisors, in consultation with Historic England.'

'Any written scheme of investigation for archaeological mitigation submitted under paragraph (2) must be in accordance with the Detailed Archaeological Mitigation Strategy and take into account the final design of the authorised development'

- 7.13. Furthermore, as set out above, the council continues to maintain that the current Permitted Preliminary Works Environmental Management Plan [\[REP5-106\]](#) should be considered an outline plan, and that the detailed Plan should be submitted to the local planning authority for approval prior to any works being undertaken. The council considers that the PPWEMP should become a Requirement in its own right, and therefore Requirement 13(1) should be deleted and / or substantially amended.

- 7.14. Additionally, as stated within its response to ExQ2 DCO2.1 [[REP5-112](#)] and at ISH9, the council continues to contend that a provision must be included within Requirement 20 for the undertaker to formally submit to the LPA that all decommissioning activities have been completed for the council's approval and confirmation.
- 7.15. It is the council's understanding that TPO07 will be added to Part 3 of Schedule 12 of the dDCO to provide consistency with N/TPO08.
- 7.16. Furthermore, dDCO (Rev 6) submitted at Deadline 6 has been reviewed and it is evident that the changes made to the document pertain only to the protective provisions. Therefore, the comments made by the council in previous representations regarding the lack of a robust rationale to substantiate why it is necessary to list every hedgerow within the Order Limits, if indeed as the Applicant advises, all hedgerow removal will be controlled by the provisions of Article 40(4) and be undertaken in accordance with that prescribed within the EPMS, still stand.
- 7.17. As such, the council reiterates that it considers overly wide powers are afforded to the Applicant by virtue of Schedule 12 and again queries why the extent of removal cannot be refined within the schedule. The council considers that it should, at the very least, be possible to specify in column (2) of Part 1 and Part 2 of Schedule 12, a range of hedgerow removal i.e. a minimum and maximum extent of hedgerow that may need to be removed from each of the hedgerows listed. This should be possible given the provisions of Article 40(4) and the footnotes in Schedule 12.
- 7.18. In previous representations, the council highlighted that in respect of the cable route corridor (CRC) where it coincides with the Bath and Bradford-on-Avon Bat SAC consultation zone, the Applicant has committed to restricting hedgerow removal at discrete locations to 10m, and yet this has not been transposed into the relevant rows in the respective table in Schedule 12. The council notes that this request has still not been fulfilled even though it should be entirely feasible for this to be undertaken. As specified in previous representations, it is the council's view that despite the footnotes added to Schedule 12, Part 1 and Part 2 and the provisions of Article 40(4), the aforementioned omission from Schedule 12 undermines confidence that the measures set out in the HRA, Chapter 9 of the ES and the EPMS will be adhered to strictly.
- 7.19. Additionally, as confirmed within the council's Statement of Common Ground [[REP6-046](#)] and at ISH9, Wiltshire Council agrees that the production, approval and implementation of the Arboricultural Method Statement (AMS) is secured through Requirement 13 of the dDCO, so no additional standalone requirement is required, nor for it to become a certified document in its own right (Schedule 13).
- 7.20. Schedule 13 should be amended to reflect the council's position on the PPWEMP and also to include the Outline Community Liaison Group Terms of Reference, as discussed at ISH9.

- 7.21. In relation to Schedule 16, the council's position remains unchanged since its response to ExQ2 DCO 2.1 [\[REP5-112\]](#) as set out at ISH9. The period for discharge applications should be twelve weeks and not the ten weeks currently specified in 2(2). Furthermore, the council considers that the period for requesting further information should be extended to 20 working days in 3(2), which would be in line with the Mallard Pass Solar Farm DCO. The following wording should also be included against each numerical charge within Clause 5 to state "*or the fees applicable at the time of application by the Applicant*". This is due to the extended period in which applications for discharge will be made given the scheme's stated operational life of 60 years.

8. 6.2 Environmental Statement Volume 2 Figure 3-4-1 to 3-4-2 Landscape and Ecology Mitigation Plan (Rev 4) (1 of 4) [\[REP6-009\]](#)

- 8.1. The council has provided comments on submissions received at Deadline 5 [\[REP6-069\]](#) Paragraphs. 6.3 and 6.4, which included comments on [\[REP5-039\]](#) 6.2 ES, Vol 2, Figure 3-4-1 to 3-4-2 Landscape and Ecological Mitigation Plan (1 of 4) [\[Rev 3\]](#). These comments remain to be considered by the Applicant.

- 8.2. The council highlighted at Paragraphs. 6.3 and 6.4 [\[REP6-069\]](#) that:

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 [\[REP5-039\]](#) (latest revision (4) [\[REP6-009\]](#)) 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' [\[REP5-039\]](#) and revised to address this.'

- 8.3. And further that:

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.'

- 8.4. The council provided further comments on the Landscape and Ecology Mitigation Plans [\[REP5-039; REP5-040; REP5-041; REP5-042\]](#) at section 4 of

its comments on submissions received at Deadline 5 [\[REP6-069\]](#) pertaining to internal access tracks and roads, which also remain to be considered by the Applicant.

8.5. The council highlighted at section 4 that:

“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.”*

8.6. Furthermore, it is noted that the Deadline 6 Cover Letter [\[REP6-001\]](#) states that the figure has been updated to reflect the removal of panels and associated infrastructure from the southern part of Field A1 and that this has been replaced with proposed wildflower meadow. It specifies that this has also resulted in a small shift of the panels in Field A2 further to the south to accommodate a new hedgerow between Field A1 and A2, and the associated buffer requirements between the A2 panels and that hedgerow.

9. 6.3 Environmental Statement Volume 3 Appendix 11 Flood Risk Assessment and Drainage Strategy

- 9.1. The LLFA considers that the detailed surface water drainage strategy, which must be in accordance with the Outline Drainage Strategy (ES Vol 3, Appendices 11-1 to 11-9), must be submitted to and approved by the LPA, and with the written agreement of the LLFA, prior to any part of the authorised development of the solar PV site, substation, BESS area or impermeable access track commencing.
- 9.2. The strategy must demonstrate that:
- (a) peak discharge from positively drained surfaces does not exceed the 1 in 2 year greenfield rate less 30% for all events up to the 1 in 100 year event plus 45% climate change allowance, any minimum practical flow rate being justified per outfall;
 - (b) long-term storage limits the 1 in 100 year plus 45% climate change 6-hour runoff volume to the greenfield volume;
 - (c) the first 5 mm of rainfall on impermeable surfaces is intercepted;
 - (d) within panelled areas, panel rows on slopes exceeding 3% are aligned along the contour and interceptor features are provided at the downslope margin of each field identified at risk in the approved strategy;
 - (e) baseline infiltration testing and a minimum of one full winter (1 October to 31 March) of groundwater level monitoring at each attenuation, substation and BESS location has informed the design;
 - (f) each receiving ordinary watercourse has been surveyed and has capacity to convey the discharge;
 - (g) a maintenance and management plan for the lifetime of the development is included; and
 - (h) an operational water monitoring plan with reporting to the lead local flood authority annually for five years and every five years thereafter, with remediation triggers, is included.
- 9.3. Furthermore, an as-built verification report submitted to the relevant planning authority and lead local flood authority within three months of completion of the relevant part.

10. 6.3 Environmental Statement Volume 3 Appendix 13-1 Transport Assessment (Rev 6) [\[REP6-015\]](#)

10.1. As noted in the listed Schedule for Change at Deadline 6, most of the main-body changes to the report are linked to the provision of additional topographical base information as follows:

- Annex H: Update of Drawing PL404 to include additional areas of topographical survey.
- Annex I: Update of Drawings PL303, PL305, PL306, PL307, PL308 and PL309 to include additional areas of topographical survey.
- Annex J: Update of Drawing SP38, SP39, SP42, SP43, SP44, SP45 and SP47 to include additional areas of topographical survey.
- Annex K: Update of Drawings SP50, SP52, SP54 and SP55 to include additional areas of topographical survey

10.2. The changes to the drawings in Annex I are of most interest as these show currently proposed passing bay improvements and assessed areas with carriageway widths of >5.5m or >6.0m which could have changed. The council's Highways Development Management Officer comments on these as well as other ongoing matters covered at ISH6 below.

HGV Trip Generation: Solar Farm PV Sites

10.3. Despite the Deadline 5 issue of the Technical Note and revised calculations concerning the expected HGV trip generation during the construction phase (in response to Appendix A of the SLD Deadline 4 Submission), there is still no change yet made to Table 13-12 or the original supporting calculations in Annex E. This is because the overall HGV trip generation and underlying assumptions remains a topic under discussion, with recent TEAMS meetings held by the Applicant with both SLD and Wiltshire Council. As discussed at ISH6 the council's remaining main points of concern with the assumptions are as follows:

Solar Panels – Loading per HGV

10.4. The loading per HGV appears to be a very key difference in the two trip generation calculations, with the Applicant now assuming the use of High Cube 40ft containers with a higher advised capacity of 720 to deliver all panels needed. The SLD calculation assumes standard containers with a 500 capacity, which was the Applicant's previous 'worst case' assumption so it is unclear why it should not remain so. As previously noted, it still seems to the council that it would be prudent in assessing a worst-case outcome to 'at least' assume an availability mix of high cube and normal containers. Furthermore, it has been previously queried by SLD how the 12% increase in volume achieved with a High Cube container can seemingly achieve a 44% increase in the number of solar panels it can accommodate. This still needs proving by calculation so not a simple manufacturer statement confirming that it is possible.

It is assumed that a 640W panel 2.7m² in size with protective packaging has a known size, whilst the volume of the High Cube container will also be known. As such it should be possible to prove the 720-capacity alleged. It is unclear why the disclosure of this specific information would impact upon any NDA.

Panel Mounting Structures

- 10.5. In previous comment provided at Deadline 5 in 9.64 Highways Technical Note in Response to Appendix A of the SLD [\[REP5-107\]](#) it was stated that “*The number of HGVs needed for mounting structures is now assumed to be 51.2% of the number used for PV modules. The previous ratio was 45% However, given the number of HGV deliveries for PV modules is assumed unchanged, the increase in the number of HGVs needed for this element (540-599) seems quite modest when the number of panels has increased from 588,968 to 842,500. It is noted that, with all other sites referenced by SLD, this ratio is typically 0.73*”, which is understood to remain their position.
- 10.6. This pre-supposes that circa 1,406 mounting structures can be transported on a single articulated flatbed HGV. Dividing this number into the 842,500 panels now proposed gives the new HGV estimate of 599 deliveries. This number of structures per load seems very high and needs further verification. What unit size is being assumed, and does this include the driven pile length / cap. Furthermore, what is the unit weight, as it still needs to be demonstrated that 1,406 units including packaging would not exceed the maximum laden weight of a flatbed articulated HGV.

Excavated Spoil

- 10.7. It is understood that the total agreed volume of material is now derived directly from the volumes of material used for access roads, compounds, foundations of substations and the BESS. This amounts to 94,589m³ in accordance with the Applicant's Response to SLD's Written Representation. However, it remains unclear to the council how such a large volume of excavated material will be used on site. It is stated by the Applicant that: “*A precautionary allowance for the off-site removal of up to 10% of excavated soils has been included within the Transport Assessment to represent a conservative worst-case scenario for traffic movements*”. However, it remains unclear why a figure of 10% is considered a reasonable worst case. This element of the scheme has the potential to generate very large numbers of additional HGVs, noting that even 10% disposal now included is expected to require 721 HGVs. It is noted SLD use a 25% figure in their latest calculation.

Light Vehicle Construction Trafficking

- 10.8. This topic was also covered at ISH6, notably the assumption concerning the high mode share achieved by shuttle buses. The council's Highways Development Management (HDM) position on the latter and the residual distribution assumed for car / van trips are set out below for completeness.

Shuttle Bus Mode Share Assumption

- 10.9. As stated in past HDM comments, the Applicant continues to adopt the same stance given in response to the council's comments at 'Scoping' stage, namely alignment with shuttle bus mode share assumptions made and seemingly accepted on other DCO solar farm applications. In terms of the number of workers, the Applicant advises that the 622 operatives on site is a 'peak' month based on a contractor breakdown. Whilst this is acceptable, it might be helpful to see what this expected variation looks like each month over the two-year 'build-out' programme for the Lime Down Solar Park sites, and also whether this has been adjusted to allow for the longer period now accepted as needed for the 400kV substation on the Lime Down D site. The Applicant now advises that circa 40% of the workforce will be expected to be 'resident' within a 20km distance of the area, with 60% non-resident and staying in temporary accommodation. The shuttle bus service(s) is intended to target the latter, where it is stated that this group *"will be workers staying in known locations in larger groups and suitable pick up and drop off shuttle bus points can be easily arranged"*. The council questions how it can possibly be assumed that these transient workers will be living close together in larger groups, to the point that the shuttle bus will cater almost exclusively for all these longer distance commuting trips. The council maintains the view that a 50% uptake of the shuttle bus service is optimistic, and a lower share should have been assumed in assessing a worse-case traffic generation impact.

Light Vehicle Trip Distribution

- 10.10. As previously stated, the Applicant considers that the current distribution methodology for light vehicle trips provides a worst-case assumption in terms of impact by placing all light vehicle trips onto the identified construction routes. However, when looking at the 20km distance from the site assumed for the 40% of workers deemed 'resident', it will readily be seen that most of the larger urban settlements lie to the south and east, so Corsham, Chippenham, Calne and Malmesbury. As such, the likelihood of any workers from any of these settlements routing to the Lime Down A-C area via the A46/B4040/B039 is very low. Bath, which is just outside the 20km distance to the southwest, is the only urban centre where this route to Lime Down A-C might be considered an attractive option. In short, a considerable proportion of the workers accessing Lime Down A-C could route via the A429, so adding to traffic pressure on the road between Dyson roundabout and Bradfield Cottage if continuing to the Fosse way via Norton or potentially using The Street through Hullavington and Grittleton. Whilst this will result in less potential traffic pressure on the B4040 and B4039 to the west, it would increase pressure and impact on some of the narrower and less suitable roads between the A429 and the Fosse Way. This is arguably the worst-case scenario.

Construction Routes: Highway Improvement Works - Annex I

- 10.11. This topic of discussion at ISH6 essentially covered latest drawings in Annex I to the Transport Assessment. Comment then was also influenced by a site meeting held with the Applicant's transport consultant (TPA) and Bruce Bamber

representing SLD on Thursday 10th September. A walkover of the route between The Street junction and Bradfield Cottages was undertaken (Lime Down D) and the road between Fosse Way and the Lime Down A access points to verify widths and passing place opportunities. It should be noted that it was not possible to additionally walk the length of Fosse Way during this visit to verify width measurements advised here.

Drawing PL302 Rev A 'Alderton Road'

10.12. The council's HDM comments remain unchanged from these made in respect of the Annex I drawings issued at Deadline 4 [\[REP5-113\]](#). To re-iterate: *"Drawing PL302 shows the passing place proposals along Alderton Road. The Overview plan shows nine proposed locations for localised carriageway widening, with dimensioned details now shown in Insets 1-9. All these inset details show a passage length of circa 20m or greater and width throughout of 6.0m or more. This is considered adequate to pass two 16.5m articulated HGVs in all cases, although at detailed design stage the undertaker would be asked to confirm this with a swept path analysis through each location as part of the suite of drawings for technical approval. Details of the construction make-up and 'tie-in' to the existing carriageway in these locations is not considered necessary at DCO approval stage"*. In short, the council has no further issues with the proposed scope of works in this HIA location.

10.13. For the avoidance of doubt, any concerns over the Alderton Road / Fosse Way junction are discussed separately below, as this was raised at ISH6. The point was also made at ISH6 that the 'Design Vehicle' used for assessing the required width and length of the HGV passing place improvements should be universally applied (so 2 number 16.5m articulated HGVs), as is the case here.

Drawing PL303 Rev B 'Fosse Way - South'

10.14. The length between the bend and the crossroads junction at Fosse Lodge (Inset 3) is 882m, so the proposed reliance on two existing informal passing spaces leaves an intervisibility distance of nearly 300m between them, which is considered excessive and unacceptable. As noted at ISH6, it will be very difficult for an HGV driver to judge whether it is possible to move forward with a sightline this far, even with the straight alignment of Fosse Way. Locations identified at Insets 1 and 2 are simply existing areas of informal hardcore, so not made-up carriageway. Furthermore, the dimensions indicated at the location in Inset 1 would not accommodate two-way passage of the 'Design Vehicle' (see comment under PL302 above). It is considered that the provision of 4 number passing places is needed between the bend and the Fosse Lodge junction with a nominal spacing of circa 175m. The location shown in Inset 2 could be improved as part of this provision, but it is noted that the spacing to the Fosse Lodge junction is still circa 300m. It is accepted that the crossroads junction with Fosse Lodge (Inset 3) will be used for HGV passage and has the space to accommodate 2 number 16.5m articulated HGVs. However, the next passing point proposed at Inset 4 is some 380m to the north-east, giving the same concerns with intervisibility and so both opposing HGVs passing the last passing point before being aware of the conflict.

- 10.15. In past comments, the close spacing of passing locations shown in Insets 4-8 was noted. The overall length between Inset 4 and Inset 8 is circa 440m, so a close proposed spacing of little more than a 100m on average, so a sharp contrast to what is advocated to the SW of the Inset 4 location. Proposed additional widening works at the two Lime Down C access points (Insets 5 and 7) may therefore be unnecessary. However, if done it would seem more sensible to adjust the proposed radius of the access kerbs to incorporate entry and exit tapers to achieve the width increases, rather than strip-widening into the opposite verges.
- 10.16. At ISH6, the HGV intervisibility around the bend at the southern end of Fosse Way by West Dunley Cottages was discussed. Drawing SP42 Rev B in Annex K to the Transport Assessment shows the swept path analysis for 2 number 16.5m articulated HGVs (Inset 2). This shows that there is very restricted forward visibility around this bend, so that an HGV driver travelling in either direction would have to reach the crown of the bend before being able to view the road ahead. The swept paths and the carriageway width measurements shown on Drawing PL307 Rev A (Annex I), suggest there are lengths on both approaches to the bend which have widths of at least 5.5m, although this has not been independently verified by the council or SLD. However, Drawing SP42 Rev B shows that the applied swept path for the HGV travelling north-east assumes that the driver would need to move into the widened area on the outside of the bend, so behind the give-way marking line to the side road, in order to avoid any potential collision conflict with an HGV travelling south-west and so reach a position where visibility along Fosse Way to the north-east is available. Should this HGV driver remain within the main carriageway edge line, then it is clear a potential conflict with another large vehicle would exist at a point where visibility is still blind, which was a point made by SLD at ISH6. This conflict potential is noted, although it is the council's HDM view that an HGV driver approaching this bend from the south and noting its sharpness / lack of visibility would seek to utilise the space on the outside of the bend beyond the give-way marking if clear and proceed slowly, certainly regular HGV drivers familiar with the route. In short, the risk of collision is considered low and insufficient to warrant pre-emptive widening mitigation, which also appears impractical without needing land outside the highway.

Drawing PL304 Rev B 'Fosse Way North'

- 10.17. The INSET drawing area needs expanding as the proposed passing space location referred to as 'Inset 1' is not indicated. The coverage area also needs to extend to the railway bridge so there is unbroken continuity with the INSET shown in PL303. Looking at the location of the proposed HGV passing place works in Inset 2, the distance south-west along Fosse Way to the railway bridge is 570m. As such, a single intermediate passing place is unlikely to be enough.
- 10.18. The section length between Inset locations 2 -7 is circa 500m, so with typical passing place spacings of 100m although these are far from uniform. Given the very close spacing of the local widening works proposed at the Inset 3 and Inset 4 locations, it has been questioned in past comments if both are required.

However, what is proposed over this length in terms of HGV passing provision is certainly sufficient.

10.19. The final section length between the Inset 7 and the Fosse Way junction with the road to Sherston is again circa 500m. Whilst a possible HGV passing point is indicated at the private access just north of the Pig Lane junction (Inset 8), it is clear from the dimensions that achieving 2-way passage of a 16.5m articulated HGV 'Design Vehicle' will not be possible without overrun to the verge areas either side of the asphalt apron. Indeed, the wide flat verge area on the south side of Fosse Way between Pig Lane and the junction with the road to Sherston provides ample opportunity and risk of HGV over-run damage, especially as virtually no part of the carriageway is >5.5m. Whilst this can be monitored as part of the highway surveys, a bigger concern is the lack of any HGV passing opportunity between the Inset 7 and Inset 8 locations, notably south of the Pig Lane junction. It is very uncertain as to whether any large vehicle turning south from Pig Lane could see clearly to location Inset 7 (or vice-versa), whilst there would appear to be no direct inter-visibility between the Inset 7 and 8 locations.

Drawing PL305 Rev B 'Dyson Roundabout to Bradfield Cottages'

10.20. The Applicant is still providing no HIA works along this route other than at the Lime Down area D access points. This is considered unacceptable as noted at ISH6 with the following comments made:

- The western edge of the carriageway between the bend to the north-west of the 'The Street' junction and the railway bridge is significantly damaged by heavy vehicle overrun already. The outside edge of the bend also shows that regular vehicle over-run to the verge already occurs. This will only get worse very quickly with the expected increase in HGV usage with LDSP. It is the council's view that 'up front' mitigation works are required to widen the carriageway through the bend and along the western edge of the carriageway to the north as far as the field access just south of the bridge.
- Kerb / verge over-run damage has occurred at the junction with Brookside and the large concrete apron access to the rear of the Monks Tap to the north. Whilst a 10m tipper travelling in the north bound direction will be able to move into these areas to allow a southbound HGV to pass, a 16.5m articulated HGV would not be able to without over-run and further damage. It is accepted, however, that these areas can be monitored during construction and mitigation works agreed if further damage occurs to kerbing / verges in the vicinity of these accesses.
- There is no clear inter-visibility between the access to the Monks Tap and the point to the north where the carriageway has sufficient width for a centre line marking and so passage width for two HGVs. It is considered localised works are required 'upfront' to provide a midpoint passing place for two HGVs.

- 10.21. The site visit made on 10 September confirmed that the carriageway width and HGV passing opportunity between the Fosse Way junction and the stables access is generally adequate (Inset 1). There is already evidence of some over-run on the south side between the Fosse Way junction and the lay-by to the north where a short length is identified as having a carriageway width of >5.5m. This is the most logical waiting position for a southbound HGV as any large vehicle turning into this road from the Fosse Way is more readily seen at this point than in the vicinity of the layby further north.
- 10.22. To the north-west of the stables access the road edges do show significant existing evidence of heavy vehicle over run each side. There is only one point indicated between the stables access and the proposed Lime Down A access with a carriageway width >5.5m, with this situated at a private access junction over only a short length which is insufficient to pass 2 number 16.5m articulated HGVs. It is also questionable whether two 10m tipper lorries could pass without damage to the verges adjacent to the access. The road curvature and spacing distances between these three points also creates a high risk of two HGVs meeting between them, with one driver then needing to over-run the verge. However, in determining the need for pre-emptive highway mitigation to improve HGV passing place opportunity on this section, the council's HDM officer is also mindful that the additional HGV trafficking linked only to Lime Down A will be much lower than expected along Alderton Road and Fosse Way. As such, it is the council's view that this situation can be subject to monitoring using the highway condition surveys and interim action taken during construction if significant additional overrun damage is seen to occur.

11. 6.3 Environmental Statement Volume 3 Appendix 8-3-2-1 Landscape and Visual Assessment Sheets, Non Significant (Rev 2) [\[REP6-019\]](#)

- 11.1. The council understands that the visual assessment sheets have been updated following review of the visual effects for transport receptors TR038, TR043 and TR143 in connection with the removal of panels from the southern part field A1. The council has considered the revised significance of these effects under its Deadline 7 comments for [\[REP6-065\]](#) 9.74 Landscape and Visual Effects of the Removal of Solar Infrastructure from the Southern Part of Field A1 below.

12. 6.3 Environmental Statement Volume 3 Appendix 8-3-2-2 Landscape and Visual Assessment Sheets (Significant) (Rev 3) [\[REP6-021\]](#)

- 12.1. The council understands that the visual assessment sheets have been updated following review of the visual effects for transport receptors TR038, TR043 and TR143 in connection with the removal of panels from the southern part field A1.

The council has considered the revised significance of these effects under its Deadline 7 comments for [REP6-065] 9.74 Landscape and Visual Effects of the Removal of Solar Infrastructure from the Southern Part of Field A1 below.

13. 6.3 Environmental Statement Volume 3 Appendix 8-3-3 Summary of Visual Effects (Rev 3) [[REP6-023](#)]

- 13.1. The council understands that the visual assessment sheets have been updated following review of the visual effects for transport receptors TR038, TR043 and TR143 in connection with the removal of panels from the southern part field A1. The council has considered the revised significance of these effects under its Deadline 7 comments for [REP6-065] 9.74 Landscape and Visual Effects of the Removal of Solar Infrastructure from the Southern Part of Field A1 below.
- 13.2. The council further notes that reference to the removal of panels within field C9 under the reasons for revision 3 [[REP6-023](#)] are not applicable for receptors TR038, TR043 and TR143.

14. 7.8 Biodiversity Net Gain Assessment Report (Rev 5) [[REP6-025](#)], 7.9 Biodiversity Net Gain Assessment Appendix Statutory Biodiversity Metric Calculation (Rev 5) [[REP6-027](#)] and 7.9 Biodiversity Net Gain Assessment Appendix Statutory Biodiversity Metric Calculation (Rev 5) Excel [[REP6-028](#)]

- 14.1. The Deadline 6 Cover Letter [[REP6-001](#)] states that the BNG Assessment Report and Statutory Biodiversity Metric Calculation have been updated to reflect the removal of panels and associated infrastructure from the southern part of Field A1. It also stipulates that as a result of the removal of panels from the south of Field A1, the new hedgerow originally proposed between the north and south of A1 has also been removed and associated Biodiversity Net Gain calculations updated. These amendments are noted.
- 14.2. Nonetheless, a number of issues were raised previously by the council regarding the BNG submissions, and it is apparent that the updated BNG submissions do not address or overcome all these issues. During the Ecology and Biodiversity Issue Specific Hearing (ISH3) it was agreed that the SoCG between the Applicant and Wiltshire Council would be used to progress discussion on these matters further. Thus, the outstanding matters pertaining to the BNG submissions are detailed in the SoCG and will also be set out in the council's Closing Statement to be submitted at Deadline 8.

15. 7.12 Outline Construction Environmental Management Plan (Rev 7) [REP6-030]

15.1. The council has identified some minor amendments to Table 1 for clarification as follows:

- ‘Greenhouse Gas (GHG) impact on waste’ should be amended to “Greenhouse Gas (GHG) impact of waste”;
- It is noted that sustainable procurement has been included under ‘GHG emissions from construction traffic and equipment’, however the council queries whether there is a comma missing to separate ‘construction’ from ‘traffic’ as this section appears only to cover construction traffic and equipment, and not the actual materials, embodied carbon, transport of materials, supply chain etc.;
- Additionally, some of the items within the ‘GHG emissions from construction traffic and equipment’ appear to relate to waste and therefore should be in the row above;
- The Potential Impact in the third row should be amended to: “Impact of stronger winds, heatwaves, heavy precipitation and increased risk of fires/wildfires on operations”; and
- Protection from heatwaves is different to an emergency incident, so this should be planned for, with alternative working practices considered. Reference to UKHSA and Met Office guidelines that are published at the time of the expected heatwave (similar to during cold spells) should be referenced.

15.2. As raised at ISH7, the council considers that additional information should be included in terms of business continuity. In addition to emergency plans covering the infrastructure in relation to storms, some consideration of personnel would be important. This would be more relevant during the construction phase, as impacts relating to heatwaves, in addition to flood and storms, should be included as these are quite new things that parties are having to contend with. Whilst it is agreed that different contractors would have their own practices and emergency plans in place, depending on their type of operations, the procurement process could ask for information on this area, as this may not already be included in business as usual as it is a relatively new impact that operatives are having to deal with.

15.3. It is understood that the Applicant’s has included some additional text within the oCEMP to confirm that the Emergency Response Plans (ERPs) will cover extreme weather events. The detail of the ERPs will be developed as part of the detailed CEMP.

15.4. In respect of horizontal directional drilling (HDD), it is noted that Table 3 states that: “Details of task-specific Method Statements for potentially ecologically

impactful works as identified in the Outline EMPS (sic) [EN010168/APP/7.19]. For example, monitoring during proposed HDD beneath watercourses;"

15.5. It is also recognised that Table 3 stipulates:

"Trenchless technologies (such as HDD) will be adopted for selected 'avoidance areas' within the Cable Route Corridor at particularly sensitive features (such as important watercourses, railway corridors and woodland);

Both the launch and reception pits will be situated a minimum of 10 m from any watercourse and will be fully backfilled and reinstated upon completion of the cable installation;"

15.6. The council suggests that if monitoring during HDD beneath watercourses identifies the need for adaptive / additional measures to avoid and mitigate impacts on ecological receptors, that this will need to be swiftly formulated and agreed with the EA, the LLFA and council's ecology team as appropriate, and implemented. It is therefore suggested that the oCEMP should be revised to detail this requirement.

15.7. Furthermore, it is the council's understanding that the wording previously included with respect to North Bincombe Wood in Table 4 that would have allowed: *"access by the undertaker, its contractors or agents where reasonably necessary to undertake activities required to comply with, or discharge, its legal or statutory obligations in connection with the authorised development"* will be removed.

15.8. The revised provision in the oCEMP [[REP6-030](#)], oOEMP [[REP6-032](#)] and oDS [[REP6-034](#)] will therefore state:

"Any repairs to the existing access track adjacent to North Bincombe Wood shall be limited to the infilling of potholes using no-fines gravel and topsoil only. Use of the access track shall be limited to access by existing landowners for the purposes of accessing and managing their land and access required by the undertaker for hedgerow and other vegetation management."

15.9. It is the council's expectation that all management plans and Works Plans which depict the track at North Bincombe Wood differentiate it on the key so that it is not confused with the access tracks to be used for operational purposes.

15.10. Furthermore, with regard to the Surrendell Wood access track, it is understood that the AMS will make clear that protective fencing will be positioned at the woodland-facing edge of the existing track, rather than at the woodland edge, so that vehicles, plant and materials cannot enter the intervening area between the track and the woodland.

15.11. The AMS will also provide for temporary ground protection over the existing track where required. Any widening within the 15m woodland buffer will incorporate an appropriate cellular confinement system and / or temporary ground-protection system suitable for the anticipated vehicle loading. The

extent and specification will be determined by the Project Arboriculturist or ACoW and shown on the relevant Tree Protection Plan.

- 15.12. It is the council's understanding that the Applicant will amend the wording in Table 4 of the oCEMP [REP6-030] and oDS [REP6-034] will to state as follows:

"Protective fencing will be installed, where appropriate, along the woodland-facing edge of the existing access track adjacent to Surrendell Wood. The fencing will be positioned at the edge of the track, rather than at the woodland edge, to prevent vehicle, plant or materials entering the intervening area between the track and the woodland, including land within the 15 m woodland buffer.

Where required, temporary ground protection appropriate to the anticipated vehicle loading will be installed over the existing track before it is used by construction vehicles or plant. Any widening of the track within the 15 m woodland buffer will incorporate an appropriate cellular confinement system and/or temporary ground-protection system, designed to accommodate the anticipated vehicle loading and avoid unacceptable soil compaction or root damage. The extent and specification of these measures will be determined by the Arboricultural Clerk of Works and shown on the relevant Tree Protection Plan. The measures will be installed before the track is brought into use and maintained for the duration of its use."

- 15.13. The proposed cellular confinement system and / or temporary ground protection system must be explained within the Detailed AMS.

- 15.14. The LLFA considers that an explicit reference should be made in the oCEMP stating that:

"The construction environmental management plan must include a water management plan which must include:

- (a) a schedule of all watercourse, ditch and land-drain crossings identifying classification, method, HDD depth below bed, working window and crossing-specific method statement, approved by the lead local flood authority before the relevant works commence;*
- (b) a commitment that no ordinary watercourse will be permanently culverted and that temporary crossings are removed within four weeks of completion;*
- (c) trench-breaker specification and spacing for all cable trenches;*
- (d) a pre-construction land drainage survey and reinstatement design;*
- (e) a dewatering and discharge protocol with rate, turbidity and notification limits;*
- (f) temporary drainage and settlement design for compounds, haul routes and stockpiles; and*
- (g) work-suspension triggers for works within 20m of an ordinary watercourse or within mapped surface water flow routes."*

- 15.15. The council maintains that a comprehensive business compensation scheme is required. This should either form part of the Outline Skills, Supply Chain and

Employment Plan [\[REP3-105\]](#) or added into the overarching environmental management plans for the construction (oCEMP [\[REP6-030\]](#)), operation (oOEMP [\[REP6-032\]](#)) and decommissioning (oDS [\[REP6-034\]](#)) phases.

16. 7.13 Outline Operational Environmental Management Plan (Rev 7) [\[REP6-032\]](#)

16.1. The council has identified some minor amendments to Table 1 for clarification as follows:

- The Potential Impact in the first row should be amended to: “*Impact of stronger winds, heatwaves, heavy precipitation and increased risk of fires/wildfires on operations*”; and
- Protection from heatwaves is different to an emergency incident, so this should be planned for, with alternative working practices considered. Reference to UKHSA and Met Office guidelines that are published at the time of the expected heatwave (similar to during cold spells) should be referenced.

16.2. As raised at ISH7, the council considers that additional information should be included in terms of business continuity. In addition to emergency plans covering the infrastructure in relation to storms, some consideration of personnel would be important. This would be more relevant during the construction phase, as impacts relating to heatwaves, in addition to flood and storms, should be included as these are quite new things that parties are having to contend with. Whilst it is agreed that different contractors would have their own practices and emergency plans in place, depending on their type of operations, the procurement process could ask for information on this area, as this may not already be included in business as usual as it is a relatively new impact that operatives are having to deal with.

16.3. It is understood that the Applicant's has included some additional text within the oCEMP to confirm that the Emergency Response Plans (ERPs) will cover extreme weather events. The detail of the ERPs will be developed as part of the detailed CEMP. The council would expect this provision to equally apply at the Operational stage.

16.4. In relation to a previous version of the oOEMP (Rev 5) [\[REP4-052\]](#), in Table 3 against the heading 'Impacts on biodiversity features during the operation of the Scheme', there was reference to a sensitive lighting strategy to be contained within the detailed OEMP. The council specified at that juncture, that it assumed that the sensitive lighting strategy would be set out in Section 2.7 of the OEMP which is titled 'Control of Light'. The council also stated that whilst it is recognised that the OEMP currently comprises the outline version rather than the detailed version, it is nevertheless evident that the OEMP and Section 2.7 currently lacks sufficient detail regarding the proposed sensitive lighting strategy.

- 16.5. It is noted that rather than the council's point being addressed, the latest iteration of the oOEMP (Rev 7) [\[REP6-032\]](#) no longer includes reference to a sensitive lighting strategy within paragraph 2.7, however it is still cited in Table 3.
- 16.6. In respect of badgers, under the heading 'Impacts on biodiversity features during the operation of the Scheme' in Table 3, it is specified:
- "Should new badger setts be excavated in areas where they come into conflict with ongoing management activities, then these setts would likely be excluded under a mitigation licence from Natural England. The mitigation licence would secure any compensation measures (such as the creation of artificial setts) required, the exclusion of the setts, and would ensure any impacts to setts are compliant with current legislation."*
- 16.7. Whilst the council acknowledges that instances may arise where the only viable option is to apply for a mitigation licence in order to exclude / close a sett, nevertheless, it is considered that the outline OEMP should include text in Table 3 that sets out that in the first instance, it would be established whether any other avoidance or mitigation measures could be implemented to avoid the need to exclude a sett, such as ascertaining if the management activities could be conducted in a different manner or use different machinery, technology or plant. It is considered that there should be some provision within Table 3 for the feasibility of employing other avoidance and mitigation measures to be investigated in the first instance in accordance with the mitigation hierarchy.
- 16.8. These comments still stand as the latest iteration of the oEMP [\[REP6-031\]](#) has not been revised to address this matter.
- 16.9. The inclusion of an adaptive skylark mitigation section within Table 3 is noted. However, it is considered that it lacks sufficient detail regarding what would comprise the trigger points for instigation of adaptive mitigation and / or management, such as the number of breeding pairs.
- 16.10. These comments still stand as the latest iteration of the oEMP [\[REP6-031\]](#) has not been revised to address this matter.
- 16.11. Please also see changes identified above on the oCEMP relating to adaptive management measures for HDD which the council expects to be replicated in the oOEMP.
- 16.12. It is the council's understanding that the Applicant has agreed to include the following provision in the relevant sections of the oOEMP [\[REP6-032\]](#) and oLEMP [\[REP6-038\]](#) in relation to notification of replacement planting.
- "Where replacement planting is undertaken to mitigate the operational loss of a retained BS 5837:2012 Category A or Category B tree, Wiltshire Council will be notified of the proposed species, size, specification and location of the replacement planting before the planting is undertaken."*

- 16.13. Furthermore, whilst the oCEMP [\[REP6-030\]](#) already includes the agreed ACoW competency wording, it is the council's expectation that equivalent phase-appropriate wording will be added to the oOEMP [\[REP6-032\]](#), oDS [\[REP6-034\]](#) and oLEMP [\[REP6-038\]](#) confirming that the ACoW will be a suitably qualified and experienced arboriculturist with at least five years' relevant professional experience and appropriate knowledge of BS 5837, tree-protection measures and works within or adjacent to Root Protection Areas.
- 16.14. Additionally, it is the council's understanding that Table 4 of the oOEMP will be amended to confirm that Wiltshire Council may make representations during the five working day notification period and that the undertaker must have regard to any representations received before undertaking the works. The wording to be added states:
- "Wiltshire Council may make representations to the undertaker during that five-working-day period. The undertaker shall have regard to any representations received before undertaking the works."*
- 16.15. It has also been agreed with the Applicant that relevant arboricultural survey information held by the undertaker will be provided to Wiltshire Council upon request. The wording to be added to the oOEMP states:
- "Any relevant arboricultural survey information held by the undertaker in relation to the tree will be provided to Wiltshire Council upon request."*
- 16.16. Please also see changes identified above on the oCEMP relating to North Bincombe Wood which the council expects to be replicated in the oOEMP.
- 16.17. The council's Arboricultural Officers have also reviewed how the proposed wholesale replacement of the solar panels would be controlled. The planned replacement is treated as an operational activity in Section 2.13 of the Outline OEMP. Paragraph 2.13.3 confirms that applicable construction-phase mitigation has been carried across into Section 3 of the Outline OEMP, and Table 4 includes arboricultural controls specifically applicable to maintenance and replacement activities.
- 16.18. The detailed OEMP must be approved under Requirement 14 before the Scheme becomes operational and panel replacement would need to comply with that approved document. On that basis, replacement would not trigger a new CEMP or a further discharge of the pre-construction CEMP requirement. Instead, the relevant construction-type controls would be secured and implemented through the detailed OEMP. At the moment there isn't an explicit requirement within the Outline OEMP to re-survey the areas that would potentially be affected by the panel replacement programme (acknowledging that the arboricultural baseline adjacent to access routes may change over the lifetime of the Scheme). Therefore, it is the council's understanding that the Applicant will add the following wording to the oOEMP:

“Prior to any planned replacement of all or a substantial proportion of the Solar PV Panels:

- A tree survey would be undertaken in accordance with BS 5837:2012 (or in line with most recent adopted standard and industry guidelines)*
- An Arboricultural Impact Assessment would be produced alongside an Arboricultural Method Statement.”*

16.19. The LLFA considers that an explicit reference should be made in the oOEMP stating that:

“The operational environmental management plan must include the operational water monitoring plan, the ground-cover performance standard (bare ground not exceeding 10% in any 10 m x 10 m quadrat and 5% within 1 m of panel drip-lines; no grazing when soils are at field capacity), the SuDS maintenance and management plan and the BESS containment testing regime approved under Requirements 6 and 11, and must provide for an annual report to the lead local flood authority for the first five years of operation and every five years thereafter, with remediation of any identified failure within a period agreed with the lead local flood authority.”

16.20. Please also see changes requested on the oCEMP regarding the inclusion of a comprehensive business compensation scheme, which should equally apply to this management plan.

17. 7.14 Outline Decommissioning Strategy (Rev 5) [[REP6-034](#)]

17.1. The council has identified some minor amendments to Table 1 for clarification as follows:

- The Potential Impact in the second row should be amended to: *“Impact of stronger winds, heatwaves, heavy precipitation and increased risk of fires/wildfires on operations”*; and
- Protection from heatwaves is different to an emergency incident, so this should be planned for, with alternative working practices considered. Reference to UKHSA and Met Office guidelines that are published at the time of the expected heatwave (similar to during cold spells) should be referenced.

17.2. As raised at ISH7, the council considers that additional information should be included in terms of business continuity. In addition to emergency plans covering the infrastructure in relation to storms, some consideration of personnel would be important. This would be more relevant during the construction phase, as impacts relating to heatwaves, in addition to flood and storms, should be included as these are quite new things that parties are having to contend with. Whilst it is agreed that different contractors would have their

own practices and emergency plans in place, depending on their type of operations, the procurement process could ask for information on this area, as this may not already be included in business as usual as it is a relatively new impact that operatives are having to deal with.

- 17.3. It is understood that the Applicant's has included some additional text within the oCEMP to confirm that the Emergency Response Plans (ERPs) will cover extreme weather events. The detail of the ERPs will be developed as part of the detailed CEMP. The council would expect this provision to equally apply at the Decommissioning stage.
- 17.4. The council notes that the construction AMS is secured through the Outline CEMP and Requirement 13. During operation, Table 4 of the Outline OEMP carries forward several controls, including ACoW supervision, tree-protection fencing and ground protection during maintenance and replacement activities. The additional panel replacement wording described above will further clarify the operational arrangements.
- 17.5. For decommissioning, Table 4 of the Outline Decommissioning Strategy requires:
- a tree survey to be undertaken before decommissioning in accordance with BS 5837:2012, or the most recent adopted standard and industry guidance at that time;
 - an Arboricultural Impact Assessment to be prepared; and
 - an Arboricultural Method Statement to be produced alongside that assessment.
- 17.6. Please also see changes identified above on the oCEMP relating to North Bincombe Wood and Surrendell Wood and on the oOEMP relating to the arboricultural clerk of works which the council expects to be replicated in the oDS.
- 17.7. The LLFA considers that an explicit reference should be made in the oDS stating that:
- "The decommissioning strategy must include a decommissioning drainage plan, prepared in consultation with the lead local flood authority, providing for removal of impermeable surfaces, lined drainage and containment, the retention or removal of vegetated SuDS, de-compaction and verification of infiltration against the approved baseline, reinstatement of land drainage, retention of trench breakers where cables are left in situ, and restoration of ordinary watercourse crossings."*
- 17.8. Please also see changes requested on the oCEMP regarding the inclusion of a comprehensive business compensation scheme, which should equally apply to this management plan.

18. 7.15 Outline Soil Resources Management Plan (Rev 5) [\[REP6-036\]](#)

- 18.1. Within the council's Comments on any submissions received at Deadline 5 [\[REP6-069\]](#), section 14.4, the council highlighted that the limited good practice measures included within paragraph 1.8.23 [\[REP5-078\]](#) omitted key environmental constraints which needed to be factored when seeking to establish the parameter locations of the soil stockpiles within the detailed SRMP. The council notes that indicative parameter locations have still not been provided by the Applicant on any plans to date, which demonstrates the Applicant does not have a clear idea in principle where these would be located to allow their eventual re-use at decommissioning.
- 18.2. While the council welcomes the expansion of paragraph 1.8.23 in the latest revision (5) oSRMP [\[REP6-036\]](#) to include additionally referenced measures (environmental constraints), it is still not clear to the council whether the Applicant could locate stockpiles within fields serving as embedded mitigation areas adjacent to the CNL or as landscape / ecological enhancement areas for the project.
- 18.3. As discussed in ISH5, the council seeks further assurance and planning certainty from the Applicant that soil stockpiles will not be located in prominent fields within the setting of the CNL where panels have already been removed from the proposal to provide landscape and visual mitigation, or in field areas that provide ecological mitigation areas for ground nesting birds.
- 18.4. The council remains concerned that further clarification of the indicative locations for the large volumes of topsoil that will require stockpiling for restoration following decommissioning have still not been provided by the Applicant.
- 18.5. The council suggests that greater planning certainty could be achieved if Paragraph 1.8.23 [\[REP6-036\]](#) were supplemented and revised to include additional bullet/s under '*Landscape and Visual*' to read:
- 'No stockpiles should be located in prominent fields within the setting of the CNL where panels have been removed from the scheme to provide landscape and visual mitigation, or in field areas that provide ecological mitigation areas for ground nesting birds, as set out in Table 7 of the oLEMP [\[REP6-037\]](#) where that would conflict with the purpose of the mitigation.'
- or
- 'Consideration to the nature of stockpiling (i.e. dimensions) should be given where proposed to be located adjacent to the Cotswold National Landscape, to ensure there are no further impacts as a result of changes

to the setting of the CNL, beyond that identified as a result of other infrastructure associated with the scheme.'

- 'No stockpiles shall be located in field areas that are identified to provide ecological mitigation areas for ground nesting birds, as set out in Table 7 of the oLEMP [REP6-037] where that would conflict with the purpose of the mitigation.'

- 18.6. The council notes inclusion of the following additional text within Paragraph 1.8.23 *"As an alternative to stockpiling subsoil, the resource may be used to simulate topsoil inversion in ecological mitigation areas where practicable to lower the residual surface fertility of former agricultural soil and reducing competition between sown species and weeds."*
- 18.7. The council highlights that while topsoil inversion could help lower fertility and competition between sown seed species and weeds, such topsoil reversion would permanently alter the physical state of the baseline agricultural soil resource which has not been considered within any assessment/s or incorporated into any scheme proposal/s to date and contradicts the current soil separation methodologies included within the current version of the oSRMP [REP6-036]. The council considers this demonstrates the Applicant has given this insufficient consideration to date, despite the potential for associated significant effects in connection with locating soil stockpile locations for the large volumes of likely resulting topsoil and sub-soil for subsequent restoration purposes at decommissioning.
- 18.8. The council also highlighted at ISH5 that the different time periods that land will be used for energy generation within the order limits varies (by agreement with different landowners) i.e. some for up to 40 years and some for up to 60 years, which could further complicate locations for stockpiling, as soil storage would be required to be located where it could be accessed and re-used either at year 40 or at year 60, which is not currently considered within the scope of the oSRMP [REP6-036] as a locational consideration. This could be further addressed in the council's view by incorporating a further principle that long-term soil stockpiling locations should be located as close to the point of its required re-use as practicable, as excavated soils are unlikely to be surplus to requirements for decommissioning land restoration purposes.
- 18.9. The LLFA considers that an explicit reference should be made in the oSRMP stating that:
- "The soil resources management plan must include baseline and post-construction infiltration and bulk density testing, remediation triggers, the trench-breaker and subsoil reinstatement standards required under Requirement 13, and a dry-condition handling test for topsoils exceeding 27% clay. Reinstatement of the cable route corridor must be certified by a suitably qualified drainage engineer before hand-back to the landowner."*

19. 7.18 Outline Landscape and Ecological Management Plan (Rev 4) [\[REP6-038\]](#)

- 19.1. As noted in the council's responses to the ExA's 2nd written questions [\[REP5-112\]](#) CH1.12 and DC02.1, the council considers that the content of the outline Landscape and Ecology Management Plan should be revised to incorporate monitoring and adaptive management measures for planting where it is proposed to provide a specific screening function to achieve lower residual adverse effects for specific receptors, including heritage assets. This would provide greater certainty and incentive to ensure effective visual mitigation outcomes and lowered residual effects are achieved and maintained for the operational life of development.
- 19.2. The Applicant has, in their response to the council's responses noted above [\[REP6-060\]](#) CH1.12a, agreed to provide a list of heritage assets where the reinforcement of landscape features has been proposed as mitigation. The list of heritage assets will be consolidated from the tables provided 6.3 Environmental Statement Volume 3, Appendix 12-8 Cultural Heritage Impact Assessment Tables [\[APP-232\]](#).
- 19.3. This list will need to be added to the LEMP to inform a new provision for monitoring and adaptive management, as requested.
- 19.4. Wiltshire Council's Ecology Officer has previously raised concern regarding the Applicant's proposal to manage and maintain all hedgerows across the Order Limits at a height of 4.5m (or 4-5m as stated in the oLEMP) above ground level (AGL), except those where they will be maintained at a different height for landscape and visual impact reasons. The council previously queried on more than one occasion why it hadn't been proposed that the hedgerows bordering the ecological mitigation areas will be managed at a lower height in order to benefit the ground nesting bird species, which are a target species for these mitigation areas. It is recognised that the oLEMP has since been amended to address this concern and that paragraph 1.3.34 states:
- "In addition, the shrub layer of retained hedgerows at all boundaries of Fields A11 and A12, as well as new hedgerows at the northern and eastern boundaries of B12, will also be managed at existing heights or at 1.5 m (whichever is greater) to preserve open habitats in these fields, which will be managed for ground nesting birds."*
- 19.5. However, at paragraph 1.1.34 of the oLEMP, it refers to the maintenance of the shrubby element of other hedgerows across the Order Limits (excluding select hedgerow trees) to an optimum height of 4–5 m tall whereas other submitted documents state that the hedgerows will be maintained at 4.5m AGL. The council would therefore seek clarification with respect of this discrepancy and for documents and plans to be updated to either consistency refer to 4.5m AGL or 4-5m.

- 19.6. Please also see changes identified above on the oOEMP relating to the notification of replacement planting and arboricultural clerk of works which the council expects to be replicated in the oLEMP.

20. 7.19 Outline Ecological Protection and Mitigation Strategy (Rev 6) [[REP6-040](#)]

- 20.1. Method Statement 13: Specific Measures for Avoidance of Impacts on Dormice detailed in the oEPMS specifies that prior to any removal of hedgerow or dense scrub, an EcoCoW will carry out a pre-commencement inspection to ensure that there are no dormice or dormouse nests present and that this inspection will comprise a fingertip search of all vegetation to be removed for signs of summer or winter hibernation dormouse nests. It then stipulates that where no signs of dormice or their nests are found within a particular section, vegetation clearance can progress under the supervision and direction of the EcoCoW via a single-stage clearance, and that this is appropriate for any time of year.
- 20.2. Method Statement 13 is therefore proposing that subject to the results of the pre-commencement fingertip search, the removal of hedgerow or dense scrub can proceed at any time of year.
- 20.3. In Wiltshire Council's Response to the ExA's second written questions (ExQ2) [[REP5-112](#)], the council highlighted that the approach detailed in Method Statement 13 appeared inconsistent with that stipulated against item 3.3.15 of the SoCG between the Applicant and Natural England (NE) [[REP4-063](#)] wherein NE specifies that the Applicant had committed to out of season works for hedgerow removal in order to protect dormice. The relevant extract of the SoCG between NE and the Applicant is below:

"The Applicant has clarified how hedgerow removal will be carried out, including whether clearance will be single or two-stage. Proposed works align with recommended seasonal timings to avoid impacts to breeding or hibernating dormice or provide clear justification where non-standard timings are proposed."

- 20.4. The council highlighted previously that it was therefore apparent that NE is of the view that the hedgerow removal will be seasonally timed, whereas Method Statement 13 indicates that the works will not be seasonally timed and instead will be undertaken at any time of the year subject to the results of the pre-commencement survey.
- 20.5. In effect, Method Statement 13 does not stipulate or discuss any seasonal restrictions to the works being undertaken or prescriptions in relation to avoiding particular times of the year. Method Statement 13 appears unchanged in the latest draft of the oEPMS submitted at deadline 6 and likewise there does not appear to have been any associated updates in the SoCG between NE and the Applicant.

- 20.6. The council therefore suggests that Method Statement 13 is amended accordingly to align with what was agreed with NE as detailed in the SoCG between the Applicant and NE; and because the council would also seek the method of working that NE requires.
- 20.7. Please also see changes identified above on the oOEMP relating to the arboricultural clerk of works which the council expects to be replicated in the oEPMS.

21. 7.22 Outline Construction Traffic Management Plan (Rev 6) [REP6-042]

- 21.1. As noted in the listed Schedule for Changes at Deadline 6, most of the main-body changes to the oCTMP within Revision 6 are again minor and only serve to align the information with changes made to the Transport Assessment so for example:
- Annex E: Inclusion of drawings PL303, PL306, PL307, PL308, PL309 and PL404
 - Paragraph 6.12.1: Expansion of tools to be utilised for road condition surveys, so as requested by the Council with the added wording stating *“The method of survey will be agreed with the local highway authority in the Final CTMPs and will include a combination of video and photographs, with plans identifying the condition of relevant roads”*
- 21.2. Table 4, which shows the overall number of expected HGV trips during the construction phase, as shown in Table 13-12 of the Transport Assessment, is still out of date and so subject to change.
- 21.3. Outstanding council HDM comments on the cCTMP are mainly concerned with sub-section 6.12 'Road Condition Survey'. It is noted that Revision 6 [REP6-042] still includes the wording in paragraph 6.12.1 which states: *“Any identified highways defects or carriageway structural failures resulting from construction activities associated with the Site will be corrected to the satisfaction of the local highway authority either on the completion of the Construction Phase or, if required for safety reasons, prior to or during the Construction Phase. The Highway Authority will be allowed to recover any additional costs incurred, over and above its existing responsibility to maintain, in a steady state, the road(s) in question”*. This leaves a lot of potential for arguments about remediation noting the last sentence, unless this is accepted by the Applicant that construction trafficking on the rural lanes associated with LDSP is deemed extraordinary. In short, the council's view is that all the identified roads shall be returned to a condition which is at least as good as the pre-construction highway survey state, or better, and that all costs for doing so must be borne by the Applicant. This removes any ambiguity as to what will be expected and liability for remedial costs. It is accepted, however, that there is existing carriageway edge damage to many of the narrow rural roads proposed for HGV construction

trafficking, but it is also the case that these existing defects will likely increase the risk of unacceptable deterioration occurring due to the HGV trafficking usage increase expected over the two-year LDSP construction period. Remediating this in full will inevitably result in some highway betterment over the base condition.

- 21.4. The council would also reiterate past HDM comments made on Sub-section 6.18 'Adaptive Management Commitments' as it was raised by the Examining Authority at ISH6. Paragraph 6.18.2 states that *"Should it be apparent that some of the construction routes become problematic or not suitable, further mitigation measure including potential road widening within existing highway verge will be considered and agreed with the local highway authority"*. Whilst a welcome addition, it would be the council's preference that all passing place mitigation considered necessary is put in place 'before' any works commence on the Solar Park sites, so not as a reactive measure to operational / highway safety problems after they have occurred. It may also be more difficult to execute any additional highway widening works needed to the narrow lanes once the regular HGV trafficking associated with the construction of the solar park sites has begun. It was noted by the council's Network Management team at ISH6 that, should widening / repair works be needed to the part of the Lime Down area D route between The Street junction and the railway bridge, then necessary temporary traffic management measures would require a road closure whilst these works are undertaken. If the temporary closure needed is for a notable period, it is unclear what other viable route options there would be to access the main part of Lime Down area D.

22. 8.1 Statement of Commonality (Rev 7) [REP6-044]

- 22.1. Wiltshire Council and the Applicant's Statement of Common Ground has been updated for Deadline 7.
- 22.2. In relation to the 'key' highway matters reported as 'under ongoing discussion', all are still not agreed and therefore remain the same, including:
- Predicted overall HGV trip generation during the construction phase and underlying calculation assumptions. However, the Applicant and SLD have both revised their calculations and underlying assumptions. The two calculations are now much closer, with the Applicants' latest forecast increasing from their original estimate by 37.4% to 35,850 movements over the 2 years. However, the SLD estimate is still higher at 44,380 HGV movements. The council's concerns with potential underestimates in the Applicant's forecast are now associated with three specific assumptions, which are set out in comments made on the Transport Assessment.
 - Passing place mitigation needed to accommodate two opposing HGVs along the narrow rural lanes proposed for construction access, and the location of these highway works. Whilst the latest HIA proposals in Annex I to the Transport Assessment include additional passing space

works along Fosse Way, there are concerns about the overall adequacy of these passing places to the south of the Lime Down C accesses. There are also some concerns with the length of unmitigated sections to the north of the railway bridge. Furthermore, there remain no proposals to improve and accommodate HGV passage along the route between Dyson Roundabout and Bradfield Cottages, and expressly the length north-west of the junction with The Street.

- The council's desire for a bespoke s59 Highway Agreement to address wider consequential highway damage to the rural lanes being used for HGV construction trafficking, so those parts of the rural highway network not under direct highway works to form the necessary access points to the Solar Park PV sites or within defined HIA. Latest comments on this topic are provided in the review of the latest oCTMP. The Wiltshire Council Highways' concern is amplified by 9.55 'The Applicant's Response to Submissions Received at Deadline 4' [\[REP5-098\]](#) (WC 1-090), where it is stated: "*Section 59 of the Highways Act 1980 provides for the recovery of excess expenses in the cost of maintaining the highway due to "extraordinary traffic". The Applicant does not consider that the traffic associated with the construction of the Scheme is extraordinary*". This is certainly not the view of the council. Based on the Applicant's latest forecast in 9.64 [\[REP5-107\]](#), the expected HGV trafficking associated with the solar park PV sites during the two-year construction period will be 35,054 movements, noting that some assumptions within the current calculations are still subject to discussion (ISH6 Agenda Item 2) meaning it could be higher still. This is expected to result in 'peak' HGV movements of 50-60 per day on Alderton Road / Fosse Way and the route between Dyson Roundabout and Bradfield Cottages. It is hard to see how this change in trafficking would not be regarded as abnormal or extraordinary when compared with existing levels of heavy vehicle usage on these narrow rural lanes on a regular basis.

22.3. Furthermore, the council wishes to inform the ExA that the ecology section in the SoCG to be submitted at Deadline 7 has not been updated due to staff sickness. This will be updated in the final, signed version of the SoCG, which will be submitted at Deadline 8.

23. 9.69 Applicant's Response to Submissions Received at Deadline 5 [\[REP6-060\]](#)

ExQ2 – CH2.9

23.1. The council has no further comment as it considers that the Rodbourne Road junction has been satisfactorily addressed.

ExQ2 – CH2.11

- 23.2. The council notes that discussions remain ongoing in respect of economic mitigation with regards to Grittleton House.

ExQ2 – CH2.12

- 23.3. The council notes that with respect to the Adaptive Management of Mitigation, the Applicant has agreed to provide a list of heritage assets where the reinforcement of landscape features has been proposed as mitigation and where there may be a requirement for provision for monitoring to identify where screening objectives are not being achieved and where remedial management measures are required. This is welcomed and its inclusion in the management plans, and mitigation route map, is awaited so that it can be reflected in discussions relating to the SoCG in due course.

ExQ2 – CH2.13

- 23.4. Wiltshire Council notes that the Applicant has considered the potential for adverse effects as result of changes in background noise to elements of setting that contribute to the significance of heritage assets. For clarity, the council can confirm that it is in agreement with the assessments that have been made and does not wish to raise any examples where this would be a concern.

ExQ2 – DCO2.1 ah

- 23.5. The council notes the Applicant's response to the council's comments. The council has already acknowledged and welcomed some further incremental refinement and additions to the proposed soil stockpile parameters included within the oSRMP revisions to date [[REP4-054](#)], [[REP5-077](#)] within its earlier submissions. However, the council refers the ExA and Applicant to the council's latest comments on the most recent revision (5) of the oSRMP included within the council's Deadline 7 comments on DL6 submissions under [[REP6-036](#)] 7.15 Outline Soil Resources Management Plan (Rev 5) above and comments included under WC-127 which detail the council's outstanding concerns.

WC-052

- 23.6. The council notes this comment.

WC-061

- 23.7. The council notes the Applicant acknowledges the council's comment but does not respond.

WC-062

- 23.8. The council notes that the 7.15 Outline SRMP (Revision 5) [[REP6-036](#)] has been updated for Deadline 6 and welcomes the addition of additional environmental constraints when determining the final location and siting of soil

stockpiles. The council has provided detailed comments on the latest oSRMP (Rev 5) within comments provided for [REP6-036] oSRMP above.

WC-063

23.9. The council notes the Applicant acknowledges but does not respond.

WC-064

23.10. The council refers to its earlier responses under WC-062 and DCO2.1ah, and provides further detailed comments within its comments under oSRMP (rev 5) [\[REP6-036\]](#) above.

WC-066

23.11. The council refers to its earlier responses under WC-062 and DCO2.1ah, and provides further detailed comments within its comments under oSRMP (rev 5) [\[REP6-036\]](#) above.

WC-067 and WC-068

23.12. The council notes the Applicant's comments, but these do not offer any further comfort to the council. The council remains concerned that this matter should be further examined in terms of the feasible practicality of maintaining topsoil health in stockpiles for later re-use for up to 60+ years. The council refers to its detailed Deadline 7 comments provided for oSRMP (rev 5) [\[REP6-036\]](#) above and further comments provided under WC-127.

WC-069

23.13. The council notes the Applicant's comments but maintains its concerns regarding topsoil health stored in long-term (up to 60+ years) stockpiles. The council refers to its detailed comment provided under WC-127.

WC-070

23.14. The council refers to its detailed Deadline 7 comments provided for oSRMP (rev 5) [\[REP6-036\]](#) above and further comments provided under WC-127.

WC-071

23.15. The council refers to its detailed Deadline 7 comments provided for oSRMP (rev 5) [\[REP6-036\]](#) above and further comments provided under WC-127.

WC-072

23.16. The council notes the Applicant's comments and refers to the council's response provided under WC-127.

WC-073

23.17. The council notes the Applicant's comments and refers to the council's response provided under WC-127.

WC-074

23.18. The council maintains its concerns, that further spatially specific locational information and supporting evidence are required before the council's concerns can be satisfactorily addressed.

WC-075

23.19. While the council notes the 7.15 Outline SRMP has been updated to incorporate further details on spatial parameters and environmental constraints, fundamental outstanding concerns are maintained. The council provides further detailed comments on the latest version of the oSRMP (Rev 5) under its comments for [\[REP6-036\]](#) above and under comments for WC-127.

WC-088

23.20. The council notes the Applicant's comments in response, included under WC-088 and WC-089 but does not agree with the Applicant.

WC-089

23.21. The council notes the Applicant's comments. The council confirms that its earlier reference to the 'Lime Down Development Areas' does equate to 'Lime Down Sites A to E'. The council maintains that the assessment undertaken does not robustly consider sequential visual effects for receptors engaged in recreation along the Wiltshire Cycleway Route.

WC-090

23.22. The council notes the Applicant's response but considers this to be unsatisfactory in the context of carrying out a Landscape and Visual Impact Assessment for the purposes of EIA development. Views in both directions are relevant to consider when assessing worst case scenarios for sequential cumulative visual effects along linear routes.

WC-091

23.23. The council strongly disagrees with the Applicant's assessment that effects during the decommissioning stage would likely result in neutral or no effects.

23.24. The council considers that the sequential visual effects likely to arise during the project's decommissioning phase will be similar to those experienced during the project's construction phase. The users of the assessed linear routes will be both visually and perceptually aware of decommissioning activities due to increased use of the local road network for construction traffic transporting

materials and waste, visual clutter connected with road traffic management, noise from decommissioning construction activities such as dismantling the solar array, substations and BESS, breaking up concrete and macadam surfacing and concrete foundations, excavation and movement of waste and soils to restore agricultural land. The council does not consider that the Applicant's assessment of decommissioning effects is credible.

WC-092 and WC-093

23.25. The council does not accept the Applicant's conclusion that construction traffic movements connected with the construction and decommissioning of Lime Down Areas A, B and C, results in nothing more than the occasional additional vehicle movement between Foxley and Grittleton, which would have no notable effects on the perceptual visual quality and visual experiences of users of the Wiltshire Cycleway route.

WC-108

23.26. At no point has the council requested preparation of 'technical notes'. The production of technical notes has been the Applicant's chosen mechanism seeking to address observations and comments about submitted assessments made by Interested Parties and Consultees, including those made by the host authority, Wiltshire Council.

23.27. The general LVIA methodology is agreed to be appropriate, but how it has been applied within the assessment alongside its conclusions are unable to be agreed by the council for reasons already explained within its formal written submissions to date including in its Relevant Representation [[RR-4934](#)], Written Representation [[REP1-138](#)] and Local Impact Report [[REP1-137](#)].

WC-112

23.28. The council maintains its position, as set out within its comments made on submissions received at Deadline 4 [[REP5-113](#)] (Paragraph 21.8).

WC-113

23.29. The council notes the Applicant's comments, but maintains its position as set out within its comments made on submissions received at Deadline 4 [[REP5-113](#)] (Paragraph 21.9) and within its response to ExA's First Written Questions under LV1.4 [[REP3-142](#)].

WC-114

23.30. The Applicant's response is noted however the council maintains its position as set out within its comments made on submissions received at Deadline 4 [[REP5-113](#)] (Paragraph 21.10), and within its response to ExA's First Written Questions under LV1.9 [[REP3-142](#)].

WC-115

23.31. The council notes the Applicant's comments, but maintains its position as set out within its comments made on submissions received at Deadline 4 [\[REP5-113\]](#) (Paragraph 21.11) and which the council elaborates further upon within its comments on submissions received at Deadline 5 [\[REP6-069\]](#) (Section 19, pages 17 to 22) within its review of 9.60 Limestone Lowlands Character Assessment [\[REP5-103\]](#) which was submitted at Deadline 5 by the Applicant to address ExA's Action Points 14 and 15 arising from ISH2.

WC-116

23.32. The council maintains its position as set out within its comments made on submissions received at Deadline 4 [\[REP5-113\]](#) (paragraph 21.12).

WC-117

23.33. The council notes the Applicant's comments, but maintains its position as set out within its comments made on submissions received at Deadline 4 [\[REP5-113\]](#) (Paragraph 21.13).

WC-122

23.34. The council maintains its position, as set out within its comments made on submissions received at Deadline 4 [\[REP5-113\]](#) (Paragraph 21.19) as set out in WC-002 [\[REP2-039\]](#).

WC-123

23.35. The council maintains its stance as set out within its comments made on submissions received at Deadline 4 [\[REP5-113\]](#) (Paragraph 21.20) in respect of non-compliance with Wiltshire Core Strategy, Core Policy 51, which it views to be a material planning consideration.

WC-124

23.36. This relates to 9.42 Sequential Visual Effect on Wiltshire Cycleway [\[REP4-078\]](#) as set out within the Council's comments made on submissions received at Deadline 4 [\[REP5-113\]](#) (Paragraph 21.21). The council notes the Applicant's comment re-directs to their earlier responses to WC-088 to 093 inclusive [\[REP6-060\]](#). The council notes the applicant's comments but maintains its stance as set out at para's 18.1 to 18.6 inclusive [\[REP5-113\]](#) and additionally within comments (above) for WC-088 to 093 inclusive.

'18.1. The council raises concern that the methodology used is incomplete and does not fully follow the guidance issued in GLVIA 3. At Table 7.1 page 131 of GLVIA the definition of Sequential Cumulative Visual Effect specifically states: Occurs when the observer has to move to another viewpoint to see the same or different developments. (emphasis added)

18.2. Therefore, the comment at 1.1.4 of 9.42 Sequential Visual Effect on Wiltshire Cycleway [REP4-078] that: Sequential Effects relate to the visual experience of recognised routes and occur when the observer has to move to another location to see different developments, is in fact incorrect and does not take account of different locations from where the same site is visible. This is particularly pertinent where Wiltshire Cycleway Route (WCR) passes through the Lime Down development areas and the same site is visible sequentially. Therefore, as 1.1.4 states that the receptor is moving to see different developments, this misses a key part of the assessment.

18.3. Another issue which is of concern is that apart from SVP12, all the SVPs are taken with the receptors moving broadly from north-east to south-west along the Wiltshire Cycleway, with the potential sequential views available to the receptor passing in the opposite direction not having been considered or appropriately expressed in the report.

18.4. The council considers that relying on the mitigation proposed in the LVIA is not necessarily appropriate for dealing with Cumulative Effects. Paragraphs 7.39 and 7.40 of GLVIA deal with this issue. However, the report does not state what mitigation is actually proposed and how it will be appropriate for mitigating the sequential cumulative effects to the extent shown in Table 3.1. The council does not agree with the assessment that decommissioning will have no effect on sequential cumulative effects. No evidence has been provided that this will be the case, as to all intents and purposes, the effects are likely to be similar to the construction effects.

18.5. The council further notes that the assessment does not consider the sequential perceptual visual aspects which can be reasonably anticipated to arise from regularly encountered and sustained construction traffic movements along these road sections shared with the WCR along Section 14 [REP4-078] (Annex A, Wiltshire Cycleway Section Map 14) between Grittleton Crossroads and Foxley impacting cycleway users' perceptual visual quality and sequential visual experiences during the projects construction, maintenance (replacement) and decommissioning phases.

18.6. The assessment's consideration of this matter is limited to comments at paragraph 3.2.7 [REP4-078] "there will be temporary traffic management measures during construction which would have a short term and adverse effect to users of Wiltshire Cycleway". This commentary relates to the construction of HGV Passing places and AIL road widening works along this shared route length, but does not reflect the high level of increased visual and perceptual disturbance generated by the projects construction traffic, directly sharing relevant sections of the WCR, given that all construction traffic can only use this shared WCR section to construct, maintain and decommission all development proposed within Lime Down Areas A, B and C.'

WC-125

23.37. The council notes the Applicant acknowledges this comment but does not respond. The council maintains its concerns.

WC-126

23.38. The council notes the Applicant acknowledges this comment but does not respond. The council maintains its concerns.

WC-127

23.39. The council notes and welcomes the Applicant's comments regarding the additional inclusion of considerations on stockpile locations in terms of spatial and environmental constraints, which are now included in the Outline SRMP (Revision 5) [REP6-036] submitted at Deadline 6.

23.40. The council notes the comments that "*The Applicant is not aware of industry best practice specifically relating to the maximum timeframe for a stockpile.*" However, the Council considers that the proposed retention of topsoil within 3m high stockpiles for 60+ years is not supported by recognised soil-management standards or best practice.

23.41. The proposed retention of topsoil within stockpiles for up to 60 years conflicts with the principles contained within The Construction Code of Practice for the Sustainable Use of Soils on Construction Sites (2009) published by Defra, which recognises soil as a fundamental and finite resource requiring protection during construction activities. The Code promotes soil handling and stockpiling practices intended to conserve soil quality and functionality for future reuse, rather than for long-term storage over multiple decades.

23.42. Further guidance associated with BS 3882:2015 Specification for topsoil and BS 4428:1989 Code of practice for general landscape operations (excluding hard surfaces) both recommend that topsoil stockpiles should not exceed 3m in height and should be reused within 12 months. The proposed 60+ year storage period would therefore exceed recognised good practice by a factor of sixty, and no evidence has been provided to demonstrate that the physical, chemical and biological functions of the soil resource could be maintained throughout such a long period of time, as all industry related guidance and best practice recognises that soil quality deteriorates as both stockpile depth and storage duration increase, with biological activity, soil structure and ecological function progressively declining during storage.

23.43. The prolonged storage of topsoil for six decades would therefore represent a significant departure from accepted practice and therefore cannot reasonably be assumed to preserve the soil resource in a condition suitable for future restoration use without substantial degradation. It would likely take many years of soil amelioration to return topsoil stored in 3m stockpiles for up to 60+ years, close to baseline conditions.

WC-128

23.44. The council notes the Applicant's position, which differs from the council's position. No further comment.

- 23.45. The council has reviewed the additionally submitted, not updated [\[REP5-099\]](#) Tranquillity Assessment - Effects of Construction Traffic on the Cotswolds National Landscape, which was submitted into Examination at Deadline 5, within its separate Deadline 7 response to Action Point 1 (ISH5).

24. 9.70 Highways Technical Note – Non-Motorised User Surveys [\[REP6-061\]](#)

- 24.1. It is noted that the latest NMU surveys were carried out over a 7-day period from Tuesday 28th July to Monday 3rd August, so incorporating both weekdays and a weekend. The meteorological data included in Table 1 shows that all surveyed days were dry, although peak air temperatures on five of the seven days were close to or over 30 degrees Celsius. This might have had some impact on reported NMU numbers. Figure 1, which shows the survey locations, critically include two on the route between 'The Street' junction at Hullavington and Bradfield Cottages (Sites 4 and 5). However, it is unclear why the surveys undertaken on the Lime Down A-C construction route exclude any on the road between Fosse Way and Sherston or the part of Fosse Way south of the railway bridge. It is accepted, however, that NMU volumes on Fosse Way to the south of the bridge are unlikely to differ markedly from those observed at Site 2.
- 24.2. The surveys undertaken along Alderton Road / Fosse Way (Sites 2 and 3) show that this route is heavily used by cyclists, particularly on a Saturday. This is consistent with the council's Highways Officer's own observations during site visits. The relative absence of horse riders, with none recorded on the metalled part of Fosse Way over the full seven days, is a bit surprising. However, the number of cyclists is considered to reiterate the safety case for suitable and regularly spaced passing provision for two large vehicles along the length of Fosse Way. A lot of what exists is informal with carriageway edge damage in many places. In the absence of remedial treatment, the increased HGV trafficking could potentially force cyclists into these damaged edges. With respect to Site 2: Fosse Way and cycle usage the Applicant concludes "*There were 41 cyclists recorded during the proposed delivery hours on an average weekday and 93 on Saturday. Proposed and existing passing places are available at various locations along Fosse Way to facilitate these manoeuvres when necessary. There is a maximum distance of approximately 410m between passing places of at least 5.5m carriageway width. There is therefore no material impact on cyclists at this location*". As noted above, the passage spacing needs to be suitable and 410m is considered an excess 'narrow' length to avoid HGV/cyclist conflict.
- 24.3. Site 4 near the Flying Monk Café again shows that the number of cyclists is significant, notably on the Saturday. It is assumed this is typical of the route under the railway bridge as far as The Street junction, but as Site 5 only covers the narrow track into Lime Down area D to the north of the junction it is not

possible to ascertain this. The Applicant concludes that *“There were 30 cyclists recorded during the proposed delivery hours on an average weekday and 66 on Saturday. Proposed and existing passing places are available at various locations along Bradfield Cottages to facilitate these manoeuvres when necessary. There is a maximum distance of approximately 170m between passing places of at least 5.5m carriageway width. There is therefore no material impact on cyclists at this location”*. However, much of the length between The Street junction and the railway bridge is not 5.5m, whilst a recent site visit showed that most of the length north of the intermediate bend (indicated on latest TA drawings at 5.5m throughout) has significant edge damage on the western side due to past over-running.

- 24.4. It is accepted and noted that all latest NMU surveys associated with the Fosse Way / Alderton Road (Sites 1-3) and Bradfield Cottages (Site 4) indicate a low level of pedestrian usage on a weekday and a weekend.

25. 9.71 Additional Sequential Visual Assessments [[REP6-062](#)]

- 25.1. The scope of the additional sequential visual assessments includes seven minor routes. Two routes highlighted by Wiltshire Council (WC Routes 1 & 2), and 5 routes highlighted by Stop Lime Down in their respective responses to ISH2 Action Point 19. These routes are shown on Figure 1 in appendix A [[REP6-062](#)].
- 25.2. The following comments relate to the Intra project sequential visual effects on the well-used minor road routes which pass through the Lime Down Solar Park primary development areas A – E, in response to Action Point 19 of ISH2 in which Wiltshire Council was requested to: *“Mark up on a plan the minor routes where an intra-project sequential visual assessment should take place.”* These comments do not relate to the routes proposed by SLD.

General Comments

- 25.3. The council offers the following general comments:
- Paragraph 1.1.10 The report relates to Intra-project sequential effects and therefore does not include Cumulative Development Sites (CD).
 - Paragraphs 1.1.13 – 1.1.20 The methodology detailed follows the general principles contained within GLVIA 3.
 - Paragraph 1.1.21 The study area is as anticipated.
 - Paragraph 1.1.22 Sequential effects factors are accepted. Usefully, although at Paragraph 1.1.25 the fact that the majority of the roads have a 60mph speed limit, the assessments have included a timing for walking the routes.

- Paragraphs, 1.1.25 – 1.1.25 The section on Assumptions and Limitations excludes an extremely important factor, which is a key factor in the assessment of effects throughout the operational phase. GLVIA3 Page 134, Bullet point 6, states: *where the projects have yet to be constructed and may not even be fully designed, a judgement will have to be reached about their appearance, making clear any assumptions made or information used.*”

No assumptions regarding the design of the panels and other factors such as spoil storage, access points, etc have been made, therefore the design parameters used in making the judgement are not known and have likely resulted in the assessment of effects being grossly underestimated.

- Where the assessment has broken down each of the routes into smaller units and carried out assessments on each of them, this has created a large gap in the continual assessment process. There have been no sequential assessments from one section of a route to another for example, the council has no information to determine whether there are sequential effects relating to Area B, taken from the vicinity of Area D and vice-versa. This is a significant shortcoming in the interpretation of the prescribed methodology for this assessment.
- The sequential assessment should have assessed each route in both directions, as traffic travels in both directions on all roads within the three WC routes proposed. The photography of the routes is very sparse and relies largely on photographs taken for the main LVIA and not on the specific sequential routes. At Appendix 2, where the Applicant stated at ISH5, the sequential photographs were produced, the following were provided for the WC routes: WC-Route 1a – 2 x photos of the existing Hill Hayes Lane site; Route WC-Route 1b – 5 x photos previously taken along the Fosse Way but in one direction only; EC-Route 2 – no photos. The Council views this as unacceptable for the task required.
- At ISH5, in response to the issue the Applicant stated that a photographic record was not necessary and that the council could visit the route for themselves. The council finds that this response shows a lack of understanding of the LVIA process. At GLVIA3 para, 8.16 it is clear how photographs should be used in LVIA and states: *Photographs should be used in the baseline for the visual effects assessment to illustrate existing views and visual amenity at agreed viewpoints. The predicted changes must be described in the text but should also be illustrated by means of visualisations showing, from representative viewpoints, how changes in views will appear.* (council's emphasis). This work has not been undertaken by the Applicant.

Route Specific Issues

WC Route 1A

- 25.4. This route starts in Easton Town, to the east of Sherston, with users travelling through Lime Down Site A to the Fosse Way. It crosses the Fosse Way through Site B on unnamed roads to Hullavington, crossing the railway line and passing the existing solar farm on Hill Hayes Lane. The assessment only assesses intra-project effects.
- 25.5. In respect of the viewpoints, the majority are single direction and do not convey a genuine sequential journey through the receiving landscape (See General Notes above).
- 25.6. Whilst the council agrees with the general description of the route, it raises concerns in respect of the downplaying of the effects of the development. The Receptor Sensitivity of the viewpoints within the CNL and setting of the CNL be generally **High/Medium** as receptors vary between those using the lanes for recreation and appreciation of the landscape and those using them as a through route. Beyond the Fosse Way the receptor sensitivity remains **High/Medium**, before decreasing to **Medium** south of the railway. The Magnitude of change, particularly during Construction, Operation (Year 15) and Decommissioning has been under-estimated. Construction and decommissioning will inherently have a higher level of visual magnitude than suggested and there is no indication that at Year 15 post construction the mitigation is appropriate to fully integrate the development into the landscape. This is exacerbated by the fact that the design has not been fully detailed, so that an accurate assessment cannot be completed and therefore mitigation may not be appropriate for the final design proposals and may in themselves create adverse visual effects. Additionally, the proposed mitigation is based on individual viewpoints and has not been amended to deal with sequential effects.
- 25.7. Therefore, taking into account the obvious shortcomings of the Intra-project sequential cumulative effects assessment, the council considers that the Significance of Effect has been consistently downplayed. Based on generally **High/Medium** receptor sensitivity and where visible an average **Medium** magnitude of change, the overall Significance of Impact will be **Major/Moderate – Moderate Adverse** throughout the construction, operational and decommissioning phases.

WC Route 1B

- 25.8. This route follows much of the same route as WC Route 1A. It starts in Easton Town, to the east of Sherston, through Lime Down Site A to the Fosse Way. The baseline description for sections 1-3 of Route 1B is the same as for Route 1A. At the Fosse Way the route turns south-west and follows the Fosse Way towards Dunley where it then follows the road towards Grittleton.
- 25.9. The majority of the council's comments applicable to WC Route 1A are equally applicable to WC Route 1B, although the route deviates onto the Fosse Way

just north-east of Lordswood Farm. From here it follows the Fosse Way / Wiltshire Cycleway.

- 25.10. In respect of the viewpoints, the majority are single direction and do not convey a genuine sequential journey through the receiving landscape. The sequential assessment should have looked at the route in both directions, as traffic generally travels in both directions on all roads within WC Route 1B and there are no one way routes. It is also worth pointing out that Viewpoint Photographs ASVP3, 4 & 5 are pointing south-west and not south.
- 25.11. Whilst the council agrees with the general description of the route, it raises concerns in respect of the downplaying of the visual effects of the development. The sensitivity of the viewpoints will be generally High to High/Medium, being either within the CNL, the setting of the CNL or following the Fosse Way/Wiltshire Cycleway Route. The Magnitude of change throughout has been under-estimated. Construction and decommissioning will inherently have a higher level of visual magnitude than suggested and there is no indication that at Year 15 post construction the mitigation is appropriate to fully integrate the development into the landscape. This is exacerbated by the fact that, as the design has not been fully detailed, an accurate assessment cannot be completed. Additionally, the mitigation is based on individual viewpoints and has not been amended to deal with sequential effects and are not necessarily suitable for the final design. It must also be considered that mitigation proposals may not be appropriate and could, in themselves, create adverse visual effects.
- 25.12. Therefore, taking into account the obvious shortcomings of the Intra-project sequential cumulative effects assessment, the council considers that the Significance of Effect has been consistently downplayed. Based on **High to High/Medium** receptor sensitivity and where visible an average **Medium** magnitude of change, the overall Significance of Impact will be **Major/Moderate – Moderate Adverse** throughout the construction, operational and decommissioning phases.

WC Route 2

- 25.13. This route starts at Easton Grey follows minor roads south through Lime Down Site B towards Norton (where it follows a short section of the Fosse Way) and then Lime Down Site D towards Hullavington.
- 25.14. No new viewpoints have been included within this route. To accurately portray the extent of sequential visibility passing Area B, a range of viewpoints, looking both north and south should have been provided to enable a complete assessment to have been carried out. In the council's opinion, the visual sensitivity of the route passing Area B, has been under-estimated and has not taken account of the open views experienced by receptors using the route. The Magnitude of change for receptors using the route, during Operation (Year 15) and Decommissioning has likewise been grossly under-estimated. This is exacerbated by the fact that as the design has not been fully detailed, an accurate assessment cannot be completed. Additionally, the mitigation proposed is based on individual viewpoints and has not been amended to deal

with sequential effects and is not necessarily suitable for the final design. It must also be considered that mitigation proposals may not be appropriate and could, in themselves, create adverse visual effects e.g. the closing down of the characteristic open views.

- 25.15. Therefore, a change in Significance of Effect for receptors passing Area B from **Major/Moderate Adverse Significant** to **Minor Neutral** over 15 years is not only highly unlikely and is at best described as implausible from the evidence provided by the applicant throughout the LVIA process.
- 25.16. The council has the same misgivings in respect of the Significance of Effect assessment for Area D as Area B and it is considered that the Significance of Effect has been consistently downplayed. Therefore, taking into account the obvious shortcomings of the Intra-project sequential cumulative effects assessment carried out by the Applicant, the council considers that the Significance of Effect has been consistently downplayed. Based on generally **High - High/Medium** receptor sensitivity and where visible an average **Medium** magnitude of change, the overall Significance of Impact will be **Major/Moderate – Moderate Adverse** throughout the construction, operational and decommissioning phases.

26. 9.74 Landscape and Visual Effects of the Removal of Solar Infrastructure from the Southern Part of Field A1 **[REP6-065]**

- 26.1. The council notes that this document records the discussions and agreement between the Applicant and the Cotswolds National Landscape Conservation Board, for a meeting held 12 August 2026 between parties.
- 26.2. The council understands that the outcome from this meeting was that the Applicant has agreed to remove panels from the southern part of Field A1 (Lime Down A). This results in removal of all originally proposed built infrastructure from within Field A1. The council understands that whole of Field A1 is now proposed to be managed as a Diverse Wildflower Meadow.
- 26.3. The council further notes that it was also agreed between parties that the proposed woodland belt dividing the field (A1) would no longer be included. Instead, a former historic hedgerow line is proposed to be reinstated with new hedgerow planting along the northern boundary of Field A2 to provide an alternative form of visual mitigation for panels located within Field A2, noting that panels within Field A2 have been shifted further to the south to accommodate the necessary buffer between panels and the new hedgerow.
- 26.4. The proposed removal of all new industrialising infrastructure from Field A1 is welcomed and supported by the council as the council considers this field falls within the setting of the CNL.

- 26.5. The council notes the Applicant's view at Paragraph 1.1.1 that *"As the northern half of A1 is within the setting of the Cotswold National Landscape (CNL), it provides additional positive enhancement within the setting of the CNL"*. The council notes that the northern part of A1 had already been excluded as a panel area as an earlier embedded mitigation measure.
- 26.6. While the Applicant does not consider the southern part of Field A1 contributes to the setting of the CNL, and correspondingly the planting / management measures proposed in lieu are not viewed by the Applicant to be CNL enhancement. The council notes the Applicant's comments at paragraph 1.1.5 regarding the removal of all infrastructure from field A1 *"This helps push development away from the CNL, reducing the Scheme's appreciation within the landscape to the south of Sherston and further protecting the setting of the CNL."*
- 26.7. The council would just highlight to the ExA that the Applicant on one hand has agreed to the removal of all infrastructure from Field A1 following the CNLB's request to do so, presumably to better protect the CNL's setting, and on the other hand they state they do not consider the southern part of this field contributes to the setting of the CNL, and then go on to further conclude that *'This helps push development away from the CNL, reducing the Scheme's appreciation within the landscape to the south of Sherston and further protecting the setting of the CNL.'*
- 26.8. The council maintains its previous position, that the setting to the CNL incorporates a much larger area than the Applicant contends, extending well beyond the fields adjoining its designated boundary.
- 26.9. The council notes the Applicant's changes to the assessment of effects for visual receptors TR043, TR143 and TP097 presented within Table 1-1 (page 2) [[REP6-065](#)].
- 26.10. The council further notes that receptor TR038 is not included within Table 1-1, despite this receptor's changed assessed status of significance included within 6.3 ES, Vol 3 Appendix 8-3-2-1 Landscape and Visual Assessment Sheets, Non-Significant (Rev 2) [[REP6-019](#)]; 6.3, ES, Vol3, Appendix 8-3-2-2 Landscape and Visual Assessment Sheets (Significant) (Rev 3) [[REP6-021](#)]; and 6.3 ES, Vol 3, Appendix 8-3-3 Summary of Visual Effects (Rev 3) [[REP6-023](#)].
- 26.11. The council notes that the revised assessment of visual effects within this table following removal of panels from the southern A1 field area remain unaltered as **Major/Moderate** adverse (significant) at construction and year 1, and as **Moderate** adverse (significant) at operation year 15, and decommissioning for receptor TP097 (Bridleway SHER16). The council agrees with this assessment in that there is no change to the significance of visual effects for this receptor arising from the removal of panels from the southern part of field A1 and they will likely remain **Significant Adverse** for the duration of the scheme.

- 26.12. However, the council does not agree that the revised assessment of effects for receptor TR143 (Commonwood Lane) would reduce from significant adverse effects to non-significant adverse effects during construction, or year 1 operation following removal of panels from the southern part of Field A1. The council further considers that factoring that a new 132kv substation will be introduced into Field A3 which will require removal at decommissioning, alongside the solar panel strings, various supporting infrastructure components and the internal access roads, the effects of which could not be reasonably assessed as resulting in '**no effect**' during decommissioning, as currently reported within Table 1-1 [\[REP6-065\]](#) as the associated perceptual and experiential effects associated with decommissioning activities will remain.
- 26.13. The council maintains its wider concerns in relation to the assessment of landscape and visual effects included within the LVIA, in that the assessment underestimates the magnitude of change for a development of this scale and nature introduced into such a high quality, sensitive, rural, tranquil landscape, and also overestimates the landscapes' ability to successfully absorb the scheme over such a large protracted area, largely and simply through allowing existing hedgerows to grow taller and be universally managed at 4-5m heights. This form of visual mitigation, universally applied, will look out of place, as higher hedgerows already present in this landscape take a more natural growth form, rather than square faced and topped high hedgerows.
- 26.14. Managing hedgerows at increased heights in this formal manner represents a notable physical change to this landscape fabric component / element (which has not been assessed within the LVIA assessment of landscape fabric) over a wide protracted area, which restricts and closes open views and vistas, changes the scale of the landscape components, and alters experiential and perceptual qualities for visual receptors and local character.
- 26.15. The council maintains its position, that the Significance of Effect has been consistently downplayed within the assessment. The council contends that based on **High to High/Medium** receptor sensitivity and where visible an average **Medium** magnitude of change, the overall Significance of the Impact will be **Major/Moderate – Moderate Adverse** (significant) throughout the scheme's construction, operational and decommissioning phases.

27. Comments on any Submissions Received at Deadline 5 by January Farrington [\[REP6-085\]](#)

- 27.1. Wiltshire Council would like to thank Ms Farrington for her and the associated submissions from a veterinary practice and a farrier, which are in alignment with the comments the council has made on the equine report. What the Applicant does not seem to understand is that the disruption to equine and other businesses during the construction phases of this project will cause considerable disruption to these businesses and may result in them becoming non-viable. A comprehensive compensation scheme as has previously been proposed would help to alleviate these concerns.

28. 9.75 The Applicant's Response to Relevant Representations and Written Representations Received at Deadline 6 (Rev. 1) [[REP6B-010](#)]

- 28.1. Wiltshire Council are pleased that the Applicant has met with the owners of Grittleton House to explain the likely operational requirements of the proposed compound during the construction phase of the project. However, following oral submissions by the owner at the ISH8 hearing on 22 September 2026, the council remains concerned about the future viability of the business should the compound come to be installed, with the potential impact on the continued maintenance of a heritage asset.
- 28.2. In light of comments made by businesses at the hearings and the Business Survey that was a late submission by Stop Lime Down [[AS-027](#)], the council considers the case for a compensation fund to provide reassurance for businesses to enable them to plan ahead, and to protect the existing local economy is becoming increasingly apparent.

29. Report on Implications for European Sites (RIES)

- 29.1. The council has reviewed the RIES and notes the content and conclusions. As stipulated in previous representations, the council is not in full agreement with the approach to survey for bats within the CRC where it intersects with the greater horseshoe bat SAC consultation zone around the Box Mine component of the Bath and Bradford-on-Avon Bats SAC and considers that in turn this has implications in respect of the robustness of the Applicant's HRA and the certainty of assessment detailed therein and for the ability to conclude the HRA beyond reasonable scientific doubt. Nevertheless, as set out in a previous representation, given the impasse, the council now defers to the view of Natural England, as the Appropriate Nature Conservation Body (ANCB), on this matter.

Appendix A

LLFA Required Changes to 9.59 Mitigation Route Map [[REP5-102](#)]

LLFA Route Map Addendum – additional hydrological mitigation, monitoring and securing requirements (structured to mirror EXAM/9.59 Table 3-5)

Columns C–D record the Applicant's current commitment; columns E–K are the LLFA's required additions. Column M to be completed as the Applicant responds.

LLFA Ref	Topic	Mitigation Measure Source Reference (Applicant document / para)	Applicant's current Mitigation Measure, Commitment or Action	LLFA Additional Mitigation / Commitment Required	Environmental action / commitment objective	Embedded or Additional Mitigation	Phase	Monitoring Requirements incl. achievement criteria / reporting	How the commitment will be implemented / secured (DCO Requirement)	Policy / guidance basis	LLFA Priority	Applicant response status	LLFA notes
LLFA-HFD-01	Panelled areas - runoff & drip-line management	Appx 11-2 paras 3.2.1-3.2.6 (also 11-3 s.3.2, 11-4 s.3.2); MRM Table 3-5 'Linear infiltration trenches' row (p.70)	Solar PV panelled areas not treated as drainage catchments; no attenuation; reliance on LEMP/SRMP ground-cover and soil controls; drip-line concentration acknowledged but unmitigated.	Add an explicit route-map row: (a) panel rows aligned along contour where field slope >3%; (b) minimum 2.0 m inter-row vegetated gap beneath drip-line, no trafficking after seeding; (c) field-scale interceptor features (shallow contour swales or filter strips, 0.3 m deep) at the downslope margin of every field where NaFRA surface-water 'Low-High' risk or slope >5% is present (A4, A6-A9, B6-B9, C6-C7, C19/C21/C23 notwithstanding C32-C36 and equivalents at D/E); (d) discharge from interceptors to existing ditch at greenfield rate via vegetated outfall.	Prevent concentrated drip-line flow and compacted inter-row tracks from generating runoff above greenfield rate/volume at field scale.	Additional	Construction, Operation	Field-by-field drainage layout drawing showing panel orientation, interceptor alignment, levels and outfalls; as-built survey submitted to LLFA within 3 months of energisation of each Solar PV Site.	Req 11 (Surface and foul water drainage) - detailed Drainage Strategy per Solar PV Site approved by relevant planning authority following consultation with and written agreement of the LLFA; Req 5.	NPPF paras 173-175 (Dec 2024); PPG Flood Risk paras 054-056; NPS EN-3 2.10.84 (qualified 'in general'); Wiltshire CS CP67; Wiltshire LFRMS; CIRIA C753 Ch.4 & 24; Wiltshire SuDS Guidance (30% betterment).	High	Open	
LLFA-HFD-02	Panelled areas - ground-cover performance standard	OLEMP paras 1.3.96, 1.3.100, 1.3.107, 1.3.112; SRMP 1.8.38-1.8.41	Reseed where bare ground >20%; Year-1 August inspection by operating company; VESS compaction check post-piling; sheep compaction 'can resolve on its own'.	Replace 20% with: bare ground not to exceed 10% in any 10 m x 10 m quadrat and not to exceed 5% within the 1 m drip-line strip; >85% ground cover established before the first winter (31 October) following panel installation, failing which temporary erosion matting/mulch to be applied; no grazing when soils are at or above field capacity (Oct-Mar default); quadrat + infiltration monitoring in Years 1, 2, 3, 5 then 5-yearly, reported to LLFA.	Maintain infiltration capacity of high-FCO clay soils beneath and between panels for the 60-year operational life.	Additional	Operation	Annual monitoring report (Years 1-5) with quadrat %, double-ring infiltrometer results vs baseline, ponding log and remediation actions; trigger for subsolling/re-seeding where infiltration <50% of baseline.	Req 7 (LEMP) and Req 14 (OLEMP) - both to reference the ground-cover standard; Req 11 for the monitoring/reporting to LLFA.	CP67; LFRMS; Defra Construction Code of Practice for Soils; CIRIA C753 s.24.6; CIRIA C753 Table 26.	High	Open	
LLFA-HFD-03	Baseline soil infiltration & compaction	Appx 11-2 para 3.4.8 (infiltration 'likely to be limited' - desk basis); OLEMP 1.4.3 Soil Survey (infiltration capacity 'may' be measured); SRMP 1.4.1-1.4.3	No site infiltration testing; soil survey for ALC only; infiltration 'may' be measured operationally.	Pre-commencement baseline infiltration testing (BRE Digest 365 at SuDS locations; double-ring infiltrometer at min. 3 points per field or 1 per 5 ha) plus bulk density / penetrometer profile; repeat post-construction and at Years 1, 3, 5. Results to inform the detailed Drainage Strategy and remediation triggers.	Establish a defensible hydrological baseline against which 'no increase in runoff' can be verified.	Additional	Pre-construction, Construction, Operation	Baseline report submitted with the detailed Drainage Strategy; post-construction comparison report; remediation where infiltration falls below 50% of baseline or bulk density >1.5 g/cm3 in topsoil.	Req 11 (Drainage Strategy pre-condition); Req 17 (Soil management); Req 13 (CEMP).	CIRIA C753 Ch.25 (infiltration testing); BRE 365; Wiltshire SuDS Guidance; CP67.	High	Open	
LLFA-HFD-04	Winter groundwater monitoring	Appx 11-2 1.7.3-1.7.4 (single BGS record, no strike); 11-3 1.7.4/2 5.1 (contradictory); 11-4 1.7.3 (no boreholes); oCEMP p.68 (groundwater monitoring programme post-GI, quality-focused)	Groundwater flood risk 'Low' on SFRA mapping; monitoring programme to be developed after GI to detect quality deterioration.	Install monitoring wells at each substation, BESS, attenuation basin and lined-SuDS loca ion and along the CRC where trench depth >1.5 m in Secondary A / Principal aquifer; monitor groundwater LEVELS weekly for a minimum of one full winter (1 Oct-31 Mar) before submission of the detailed Drainage Strategy for that part; demonstrate 1 m separation between base of any unlined SuDS/attenuation and highest recorded level.	Confirm groundwater emergence risk, basin/tank buoyancy and viability of attenuation depths (1.0 m HydroBrake design heads) on clay/limestone sequence.	Additional	Pre-construction	Monitoring report with hydrographs, well logs and interpretation submitted to LLFA; drainage design not to be approved until report accepted.	Req 11 pre-condition; Req 13 (CEMP - WMP to include level as well as quality monitoring).	Wiltshire Council Drainage Policy - Groundwater Monitoring (cited by Applicant at oCEMP p.68); CIRIA C753 s.25.3; CP67; PPG Flood Risk.	High	Open	
LLFA-HFD-05	Runoff rate & volume control - hardstanding	Appx 11-2 Table 2 & Tables 4-9; 11-4 Tables 2, 4-6; MRM control document row (Req 11)	Discharge limited to 1:2 greenfield -30% (min. 1.0 l/s floor); attenuation for 1:100 +45% CC; first 5 mm interception.	Fix as Order parameters: peak discharge not to exceed 1:2 greenfield less 30% (any minimum practical rate to be justified per outfall and offset by additional storage so that the 1:100 +45% CC discharge does not exceed the 1:1 greenfield rate); long-term storage / volume control for the 1:100 +45% CC 6-hour event to greenfield volume (C753 Ch.24 9); climate change allowance fixed at 45% (Bristol Avon 2070s Upper End) and not reduced at detailed design; interception of first 5 mm for all hardstanding.	Ensure post-development rates and volumes do not exceed greenfield up to 1:100 + climate change.	Embedded (to be tightened)	Operation	Hydraulic calculations (Causeway Flow or equivalent) for each outfall at 1:1, 1:2, 1:30, 1:100, 1:100+45% with half-drain-time <24 h; independent LLFA check; as-built flow-control certificates.	Req 11 - insert numeric parameters in the Requirement text, not solely by reference to the Outline Strategy.	Wiltshire SuDS Guidance; CP67; Defra Non-Statutory Technical Standards S2-S4; EA peak rainfall allowances (Avon Bristol & N Somerset Streams); CIRIA C753.	High	Open	
LLFA-HFD-06	Correction of Lime Down C1 calculations	Appx 11-4 Table 2 vs Tables 4, 5, 6	Betterment column shows 1:100 rates (8.9, 3.5, 1.2 l/s); attenuation 1,065.3 m3 vs 338.6 m3; 15 CUs = 3.1 m3 total.	Reissue Appx 11-4 with corrected greenfield/betterment rates, reconciled attenuation volumes per catchment and per-unit CU storage consistent with 11-2/11-3 (6.1 m3 per 75 m2 unit); confirm land-take for a corrected ~1,000-1,200 m3 basin at C33 within the Works Plan.	Demonstrate that a feasible, corrected sized drainage solution exists at C1 within the Order limits.	Additional	Pre-construction	Corrected document accepted by LLFA before close of Examination; confirmed in SoCG.	Req 11; Req 5 (Works Plan envelope).	CP67; NPPF 173(c)/175; C753.	High	Open	
LLFA-HFD-07	Ordinary watercourse hydraulic assessment (Sites A, B, C1, E)	Appx 11-2 2.3.7-2.3.9 & Annex B; 11-3 s.2.4.2-3.8; 11-4 2.3.3-2.3.8	Manning's OCF from LIDAR sections, using 0.1% AEP surface-water map as proxy for fluvial level, >71% uplift; land drainage ditches unmodelled in FIMP.	Provide either (a) a 1D/2D model of each on-site ordinary watercourse with surveyed cross-sections and structures for 1%, 1%+45% (pluvial) and >71% (fluvial) events, or (b) a fixed design rule excluding all panels, CUs, tracks and fencing from the NaFRA 'Low risk' (0.1% AEP) surface-water extent plus 8 m, shown on the Works Plans. Method (b) acceptable to LLFA where fields are wholly outside FZ2/3.	Replace an unvalidated proxy method with a defensible basis for siting and freeboard on ordinary watercourses.	Additional	Pre-construction	Model report / exclusion plan approved by LLFA; freeboard 0.6 m to lowest panel edge and 0.3 m to CU slab above the resulting level.	Req 5 (Detailed design) and Req 11.	PPG Flood Risk (site-specific FRA); EA 'Using modelling for flood risk assessments' (2023); CP67; NPS EN-1 5.8.	High	Open	
LLFA-HFD-08	Lime Down D model - design event & essential infrastructure	EXAM/9.32 paras 2.4 (Boundary Conditions), 2.5.1, 2.8.1-2.8.2; MRM Table 3-5 substation siting row (p.66)	Design event 1% AEP +39% (Higher central 2080s); BESS and substation are 'Essential Infrastructure'.	Adopt 1% AEP +71% (Upper End 2080s) as the design event for BESS, substations, CUs and access tracks in Lime Down D; demonstrate BESS and substations are outside FZ2b (3.3% AEP) and outside the 1%+71% extent, or pass the Exception Test with compensatory storage; apply 0.1% AEP +CC to set BESS finished floor level with 0.6 m freeboard.	Apply the climate change allowance required for essential infrastructure with a 60-year design life in Flood Zone 3.	Additional	Pre-construction, Operation	Revised FRA Appx 11-6 and model outputs; BESS platform level fixed on the approved plans; post-construction level survey.	Req 5; Req 6 (BSMP); Req 11.	EA Flood risk assessments: climate change allowances (essential infrastructure - upper end); PPG Flood Risk Table 2/3; NPPF paras 173-174 and Annex 3; CP67.	High	Open	
LLFA-HFD-09	Lime Down D model - post-development, blockage & verification	EXAM/9.32 paras 2.5.2, 2.5.16-2.5.18, 2.6 (Railway culvert), 2.9	Baseline-only model; displacement to be assessed 'where necessary'; downstream culvert face projected; sensitivity on roughness, inflow, boundary, control number.	Provide: (i) post-development run including access tracks, BESS platform, substation platforms, fencing and any regrading; (ii) tabulated displacement/level-change results for panel supports; (iii) 50% and 100% blockage of the South Wales Main Line culvert; (iv) verification against any recorded flood extents (EA historic flood map, landowner records); (v) model files and FEC record supplied to LLFA/EA.	Demonstrate no increase in flood level or loss of floodplain conveyance/storage off-site.	Additional	Pre-construction	Post-development vs baseline difference mapping; max +10 mm off-site at 1%+CC; compensatory storage level-for-level where exceeded.	Req 5; Req 11; Req 13.	EA modelling guidance (2023); PPG Flood Risk; NPS EN-1 5.8; CP67.	High	Open	
LLFA-HFD-10	C33 substation on surface-water flow route	Appx 11-4 paras 2.4.9-2.4.18, 2.11.2	Substation located 'preferentially' outside mapped flow route; compensatory storage 'where required' at detailed design.	Fix the substation platform outside the NaFRA 1%+CC (Upper End) surface-water extent and the railway-parallel ditch flow route by a hatched exclusion on the Works Plans; if any encroachment is unavoidable, provide level-for-level compensatory storage and a modelled flow-route diversion (Manning's not acceptable) before consent.	Prevent obstruction of an existing surface-water flow path adjacent to Network Rail infrastructure.	Additional	Pre-construction	Exclusion zone on approved plans; modelled proof of no increase in depth on the railway or adjacent land.	Req 5 (with plan reference); Req 11.	NPPF sequential approach (para 170-173); PPG Flood Risk; CP67; LFRMS.	High	Open	
LLFA-HFD-11	Receiving ordinary watercourse capacity & outfalls	Appx 11-2 3.4.13, 3.5.2; 11-3 3.3.14; 11-4 3.4.17	Discharge to unnamed land drain 'feasible by gravity, subject to detailed design and any necessary approvals'.	Condition, capacity and continuity survey of each receiving ditch from the outfall to the first Main River / culvert, including downstream landowner structures; outfall to include headwall, flap/non-return valve where backwater risk exists, scour protection and isolation penstock; demonstration that the ditch conveys the 1:100+45% discharge plus its own 1% flow without out-of-bank flow onto third-party land.	Ensure the LLFA-regulated receiving system can accept the discharge without increasing risk to third parties.	Additional	Pre-construction, Operation	Ditch survey and hydraulic check accepted by LLFA; maintenance of outfall and 20 m of ditch either side included in the SuDS maintenance plan.	Req 11; Protective Provisions Part 9 (Drainage Authorities).	LDA 1991 s.23 (as substituted by protective provisions); CP67; CIRIA C753 Ch.28.	Medium	Open	
LLFA-HFD-12	Land Drainage Consent disapplication - LLFA approval role	MRM Table 3-5 pp.70-71 (FRAP & LDC disappplied; protective provisions for EAVLLFA); Draft DCO Sch.2 Part 9	s.23 LDA consent disapplied; 'Protective provisions have been included to ensure the EA and LLFA retain oversight'.	LLFA does not accept disapplication unless Part 9 provides: (a) LLFA approval (not consultation) of plans for any culvert, crossing, outfall, diversion, temporary dam or works within 8 m of an ordinary watercourse; (b) 28-day deemed-approval period with power to impose conditions; (c) fee equivalent to s.23 application fee; (d) LLFA power of entry / remediation on default; (e) a Watercourse Crossing & Works Schedule appended to the CEMP and updated for each phase.	Preserve the statutory function of the LLFA under the FWMA 2010 / LDA 1991 across a 22 km cable route and five sites.	Additional	Construction, Operation, Decommissioning	Signed-off schedule per phase; LLFA inspection records; no works within 8 m of an OW until plans approved.	Draft DCO Article on disapplication + Sch.2 Part 9 Protective Provisions; Req 13.	LDA 1991 s.23; FWMA 2010 s 9-s.19; Wiltshire LFRMS; CP67.	High	Open	
LLFA-HFD-13	Cable Route Corridor - watercourse crossing schedule	OEPMS 3.4.1 (schedule held in Appx 11-1); 6.2.10, 7.4-7.5; 10.3.6; oCEMP p.38 (Design Principles APP7.4)	Schedule of crossings identified as open-cut or HDD; standard best practice, temporary dams/sediment traps; hydrological engineer 'advisable'.	Submit a consolidated Watercourse Crossing Schedule (Main River / OW / field drain; grid ref; method; HDD depth below bed >=3 m; working window; crossing-specific method statement; temporary crossing type - clear-span, flumed or over-pumped; design flow not less than 1:10 for temporary works; reinstatement of bed and banks). Hydrological/drainage engineer input mandatory. No permanent culverting of any OW; temporary culverts removed within 4 weeks of completion. For HDD crossings: pre-drill bed-level survey; drilling-fluid pressure and returns monitored continuously; visual watch of the channel at 15-minute intervals during the drill; any loss of returns >10% or visible turbidity/bentonite in the channel triggers immediate stop-work. LLFA/EA notification within 2 hours and channel recovery per the breakout contingency procedure.	Control 22 km of cross-country works affecting ordinary watercourses and field drainage.	Additional	Construction	Schedule approved by LLFA before commencement of CRC works; photographic pre/post record per crossing; reinstatement sign-off. HDD monitoring log and stop-work record per crossing.	Req 13 (CEMP - WMP); Req 8 (EPMS); Protective Provisions Part 9.	LDA 1991 s.23; CP67; NPPF 175; CIRIA C532 / C648 (control of water pollution from construction); PPG.	High	Open	
LLFA-HFD-14	Cable trench - prevention of preferential flow / land-drain effect	SRMP 1.7.3, 1.8.8, 1.8.31; oCEMP Table 5 'Temporary Drainage'; oCEMP p.69 (trench up to 2 m)	Backfill with original soils in sequence; subsoils reinstated in dry condition; field drains recorded and reinstated.	Install compacted clay / bentonite trench breakers (trench stops) across the full trench section at maximum 50 m centres on gradients >3%; at every change of gradient, and 5 m either side of each watercourse, ditch or field-drain crossing; duct bedding to be non-flowing (cement-bound sand or equivalent) at breakers; an in-seepage collars on HDD entry/exit pits; as-built trench-breaker plan supplied to LLFA and landowners.	Prevent the backfilled trench and granular duct surround from acting as an unintended land drain or preferential flow path to watercourses and low points.	Additional	Construction, Decommissioning (cables left in situ)	Breaker locations recorded in as-built; post-construction inspection after first winter for seepage/ponding at trench line; remediation within 3 months.	Req 13 (CEMP); Req 17 (SRMP); Req 20 (cables in situ).	CP67; LFRMS; Defra Soils Code of Practice; industry pipeline practice (IGEM/TD1 trench stops by analogy).	High	Open	
LLFA-HFD-15	Agricultural field drainage - survey and reinstatement	oCEMP Table 5 monitoring column (p.27) and 'Temporary Drainage' (p.34); SRMP 1.8.43	Field drains identified via landowner consultation and recorded when encountered; reinstated, diverted or made good; contractor sign-off.	Pre-construction land drainage survey (records, drone/aerial crop-mark review, trial pits) for every field crossed by the CRC and every Solar PV Site field receiving tracks/CUs; drainage reinstatement design by an agricultural drainage engineer; new headwalls/outfalls to OWs shown on the Crossing Schedule; post-construction as-built land drainage plan to landowner and LLFA; 2-year defects period for drainage failures / waterlogging.	Maintain existing land drainage function so that severed drains do not cause waterlogging or new surface flows.	Additional	Construction	As-built plan; landowner sign-off; post-winter inspection report.	Req 13; Req 17.	CP67; Defra Soils Code of Practice; LFRMS.	Medium	Open	
LLFA-HFD-16	Construction dewatering & discharge protocol	oCEMP Table 5 'Discharge/Disposal of Site Runoff' (p.29) and dewatering bullets (p.39)	Site drainage incl. dewatering effluent discharged to sewers where practicable; to watercourses only with consent; suitable dewatering methods if water encountered.	Delete sewer assumption (no public sewers on sites/CRC); Dewatering protocol: settlement (min. 2 stages or proprietary), discharge to OW only via approved outfall at a rate not exceeding 5 l/s per outfall or the greenfield 1:2 rate of the working area (whichever is lower), turbidity monitoring (<100 NTU or 50 mg/l TSS), no discharge when receiving OW is bank-full, EA permit/exemption where >20 m3/day abstraction; LLFA notified 5 days before any discharge to an OW.	Prevent silt pollution and localised flooding from trench dewatering along 22 km of clay-dominated corridor.	Additional	Construction, Decommissioning	Discharge log (location, rate, duration, NTU); weekly WMP inspection; corrective action record.	Req 13 (CEMP - WMP); Protective Provisions Part 9.	EPR 2016; WRA 1991; CIRIA C532; CP67; LDA 1991 s.23.	Medium	Open	
LLFA-HFD-17	Temporary construction drainage & haul routes	oCEMP Table 5 'Temporary Drainage'; MRM Table 3-5 'Construction/decommissioning SuDS ... if necessary' (p.76); OEPMS 3.4.1 (12 m gaps, haul route)	Temporary SuDS 'if necessary'; silt fences, bunds, cut-off ditches; haul route alongside trench.	Temporary drainage design (not 'if necessary') for each compound, haul route and stockpile area: cut-off ditches, settlement lagoons sized for the 1:10 24-h event, temporary haul-route ditch crossings by pipe sized to 1:10 flow with LLFA approval, no haul route within 8 m of an OW except at approved crossings; temporary drainage removed and ground de-compacted on complete ion.	Control runoff and sediment during a multi-year construction programme on high-FCO clay soils.	Additional	Construction, Decommissioning	Temporary drainage layout in detailed CEMP; monthly inspection; post-rainfall (>15 mm/24 h) inspection.	Req 13; Req 20.	CIRIA C532/C648; CP67; NPPF 175.	Medium	Open	
LLFA-HFD-18	BESS - firewater containment and surface water isolation	MRM Ground Conditions row (p.143) 'bundled to retain firefighting substances'; Appx 11-2 3.1.1 (applies to 132kV substation only); Firewater Containment & Drainage Strategy REP3-120 (Lime Down Substation)	Bunds tested/certified prior to commissioning; substation drainage isolatable; BESS containment not specifically addressed in the drainage suite.	Bespoke BESS Surface Water & Firewater Management Plan: impermeable base and bank/berberd containment sized for the greater of NFCC/BSMP firefighting water volume plus the 1:100 +45% CC 6-h rainfall falling on the compound during the incident, with 10% freeboard; sealed drainage with normally-closed penstock/automatic shut-off on fire detection; first-flush and tested-before-release protocol (sampling for fluoride, lithium, metals, pH); tankering plan; containment outside FZ2b and above the 1%+71% level; annual integrity test; no infiltration within SPZ/Principal Aquifer.	Prevent contaminated firefighting runoff reaching Gauze Brook, ordinary watercourses or the aquifer.	Additional	Construction (design), Operation, Decommissioning	Containment volume calculation and drawings approved by LLFA/EA in consultation with Dorset & Wiltshire FRs; commissioning test certificate; annual inspection record in OEMP.	New Requirement (BESS surface water & firewater) or Req 6 (BSMP) amended to require LLFA/EA approval; Req 11; Req 14.	NFCC grid-scale BESS guidance; CIRIA C736 (containment systems for pollution prevention); EA GPP/pollution prevention; CP67; NPS EN-1 5.8 & 5.15; NPPF 175.	High	Open	
LLFA-HFD-19	BESS & substation siting - flood zone and freeboard	EXAM/9.32 1.2.3, 2.8.1; MRM Table 3-5 rows 2-4 (sequential siting, 0.6 m freeboard for panels)	Substations sequentially located in 'Low' probability areas 'where practicable'; BESS in Lime Down D intersecting FZ2/3.	BESS compound, all substations, CUs and battery ancillary plant to be located outside FZ2b and outside the 1%+71% modelled extent, finished floor / plinth level not less than 0.6 m above the 0.1% AEP +CC level, 'where practicable' qualifier removed; loca ions fixed on the Works Plans.	Meet the sequential and exception tests for essential infrastructure and avoid loss of functional floodplain.	Additional	Pre-construction, Operation	Approved plans with levels; post-construction level survey certified by a chartered surveyor.	Req 5; Req 6; Req 11.	NPPF 170-175 & Annex 3; PPG Flood Risk; NPS EN-1 5.8; CP67.	High	Open	
LLFA-HFD-20	Substation impermeable tracks & oil/firewater containment	Appx 11-2 1.9.3-1.9.4; 11-4 1.9.4; Appx 11-2 Table 3 (lined permeable surfacing)	Impermeable substation access tracks; sealed drainage 'where required'; principles in REP3-120.	All substation compounds (up to 3x132 kV + 1x400 kV); sealed drainage with Class 1 full-retention oil separator, isolation penstock, transformer bunds to 110% (or 25% of aggregate where multiple), containment for firewater per HFD-18; impermeable tracks positively drained to lined attenuation with treatment train achieving C753 SIA indices for 'medium' hazard; outfall via HFD-11.	Protect Principal Aquifer / SPZ and ordinary watercourses from operational and incident pollution.	Embedded (to be specified)	Operation	Detailed drainage drawings; separator and penstock maintenance in SuDS Maintenance Plan; annual inspection.	Req 11; Req 14.	CIRIA C736; CIRIA C753 Ch 26; EA groundwater protection position statements; CP67.	Medium	Open	

LLFA-HFD-21	SuDS maintenance for 60-year life & handover	Appx 11-2 3.12 & Annex G; MRM Table 3-5 SuDS rows (Req 14)	Maintenance by undertaker/operator per final design and OEMP.	SuDS Maintenance & Management Plan per site (schedule, responsible party, funding, access, inspection after events >30 mm/24 h, sediment removal triggers, flow-control blockage checks quarterly) submitted with the detailed Drainage Strategy; obligation to run with the land; annual maintenance statement to LLFA for Years 1-5 and on request thereafter.	Ensure drainage performs throughout operation and is not orphaned on change of operator.	Embedded (to be strengthened)	Operation	Maintenance log available to LLFA; remediation within 28 days of a recorded defect.	Req 11; Req 14.	CIRIA C753 Ch.32; Defra Non-Statutory Technical Standards; CP67.	Medium	Open	
LLFA-HFD-22	Operational surface water & flood monitoring	SRMP 1.8.40 (monitoring per WMP in CEMP/OEMP/Decommissioning Strategy); OLEMP 1.4.4 (5-yearly)	Surface water ponding / vegetation failure recorded and investigated; WMP referenced.	Operational Water Monitoring Plan (separate from construction WMP): ponding/flow-path log after events >30 mm/24 h, fixed-point photographs at drip-lines and downslope margins, ditch condition survey annually, infiltration tests per HFD-03; reporting to LLFA annually Years 1-5 then 5-yearly; remediation trigger and method statement.	Provide verifiable evidence that the 'no formal attenuation' assumption for panelled areas holds in practice.	Additional	Operation	Annual report; remediation (interceptor swales, subsoling, reseeded) where ponding persists >48 h or off-site flow observed.	Req 14 (OEMP) and Req 11.	CP67; LFRMS; C753 s.24.	High	Open	
LLFA-HFD-23	Decommissioning - drainage reinstatement	Outline Decommissioning Strategy 2.1.3-2.1.7, 2.4; MRM Table 3-5 SuDS rows (Req 20)	Piles cut to 1.2 m and capped; cables likely left in situ; SuDS features not addressed.	Decommissioning Drainage Plan: removal of impermeable tracks, platforms, lined SuDS, separators and penstocks; retention of vegetated SuDS only with landowner and LLFA agreement; de-compaction and infiltration verification against baseline; reinstatement of any land drainage; trench breakers retained where cables left in situ; ordinary watercourse crossings restored.	Return the land to its pre-development hydrological regime.	Additional	Decommissioning	Plan approved by LLFA; post-decommissioning infiltration and drainage survey.	Req 20.	CP67; LFRMS; Defra Soils Code.	Medium	Open	
LLFA-HFD-24	Flood Zone 3 / ordinary watercourse construction triggers	cOEMP Table 5 (works in FZ3 suspended on EA Flood Warning; Flood Risk Management Action Plan)	Works in FZ3 not undertaken when an EA Flood Warning is in place.	Extend trigger to Flood Alerts and to Met Office amber/red rain warnings and a site-specific rainfall threshold (e.g. >25 mm forecast in 24 h) for all works within 20 m of an ordinary watercourse or within a NaFRA surface-water 'Low' or higher extent, given ordinary watercourses are not covered by EA warnings.	Protect construction works and downstream receptors from ordinary watercourse and surface water flooding.	Additional	Construction, Decommissioning	Flood Risk Management Action Plan in detailed CEMP; trigger log.	Req 13; Req 20.	CP67; NPPF 175; PPG.	Low	Open	
LLFA-HFD-25	Site E watercourse buffers & flow paths	APP/6.2 Fig 3-4-5 1/5.2; OLEMP Table 5 (8 m ditch buffer); Appx 11-7/11-8 (not in bundle)	Riparian corridors and 8 m buffers proposed; watercourses cross array parcels.	Dimension 8 m (minimum) buffers and NaFRA 'Low' surface-water extents on the Site E LEMP/Works Plans; confirm no panels, fencing or tracks within them; provide Appx 11-7 and 11-8 floodplain compensation calculations for E2 to the LLFA.	Verify Site E complies with the same siting rules as A-D.	Additional	Pre-construction	Revised Fig 3-4-5 series with buffers; LLFA sign-off in SoCG.	Req 5; Req 7; Req 11.	CP67; NPPF; C753.	Medium	Open	
LLFA-HFD-26	Route Map document control	MRM Table 3-5 securing column (Req 17 'Soil management' vs Table 3-6 Req 17 'Public rights of way'); OLEMP damp grassland parcels numbered 1.1.1-1.1.3	-	Correct Requirement numbering across the Route Map, and paragraph numbering in the OLEMP, so that securing references are unambiguous at discharge stage.	Ensure enforceability of Requirements.	Additional	All	Corrected documents at next Deadline.	All Requirements.	Planning Act 2008 s.120; DCO drafting.	Low	Open	
LLFA-HFD-27	Panel piling within SPZ / Principal Aquifer	MRM Table 3-5 'Piling Risk Assessment' row (p.77 - 132 kV and 400 kV substation foundations only); MRM foundation flexibility row (p.68); Appx 11-2 1.8.1-1.8.2 (Lime Down A wholly within SPZ II Subsurface Activity, Forest Marble Principal Aquifer)	PRA limited to substation foundations; panel foundations to be driven piles, piles in pre-drilled holes or ground screws 'depending on ground conditions'; no assessment of panel piling as a groundwater pathway.	Extend the Piling Risk Assessment (CLAIRE 2025 / EA piling guidance) to all panel, CU and fence foundations within SPZ III and Principal Aquifer outcrop, covering: pile type selection (pre-drilled holes and ground screws to be justified against pathway creation), maximum depth relative to highest recorded groundwater (from HFD-04), grout/backfill specification for pre-drilled holes, hydrocarbon controls on piling rigs, and pile-hole sealing on decommissioning; no piling within 8 m of an ordinary watercourse or within a mapped spring line.	Prevent creation of preferential pathways to a public water supply aquifer across c.1,100 ha of pile field.	Additional	Construction, Decommissioning	PRA approved by relevant planning authority in consultation with EA and LLFA before piling commences in any SPZ field; pile logs and groundwater monitoring (HFD-04 wells) during and 12 months after piling.	Req 13 (CEMP - extend PRA scope); Req 5; Req 20.	EA groundwater protection position statements (piling in SPZs); CLAIRE piling guidance; NPS EN-1 5.15; CP67; NPPF 175.	High	Open	
LLFA-HFD-28	Fencing and debris obstruction in the Gauze Brook floodplain	MRM Table 3-5 flood-sensitive infrastructure row (p.67); Req 10 (Fencing and other means of enclosure); EXAM/9.32 2.5.2 (fencing not represented in model); Appx 11-2 2.11.1 ('floodwater to flow freely underneath')	Panels elevated so floodwater flows beneath; security/deer fencing secured by Req 10 with no flood-risk criteria, post-development model not run.	Within Flood Zone 2/3 and the 3.3% AEP (functional floodplain) extent at Lime Down D and within NaFRA surface-water extents elsewhere: (a) fencing to be post-and-wire with the lowest 0.6 m free of mesh or with hinged flood flaps, or set back outside the 1%+71% extent; (b) no solid or close-boarded fencing, gates or acoustic barriers across a modelled flow route; (c) debris (trash) management - fence lines inspected and cleared after every Flood Alert and after events >30 mm/24 h; (d) fence lines included in the post-development model run (HFD-09) as a blockage sensitivity (50% mesh blockage).	Prevent fence lines and trapped debris from acting as a flood-flow barrier that raises upstream levels or diverts flow onto third-party land.	Additional	Operation	Fence specification and setback shown on Req 10 details; blockage sensitivity result <+10 mm off-site; inspection log in OEMP.	Req 10 (amend to require LLFA/EA consultation for fencing in flood risk areas); Req 5; Req 14.	NPPF 173(c) & 175; PPG Flood Risk (no impediment to flow); NPS EN-1 5.8; CP67; EA modelling guidance (blockage).	High	Open	
LLFA-HFD-29	Cumulative downstream catchment assessment	Appx 11-1 Covering Report (not in bundle); Appx 11-2 1.6 (Sherston Avon WFD water body - Poor); 11-3 1.5 (Sherston Avon Main River to Norton); EXAM/9.32 1.2.1 (five sites + CRC); MRM Table 3-5 (site-by-site rows only)	Each FRA assesses its own site; no combined assessment of the five Solar PV Sites, BESS and cable corridor on the receiving Sherston Avon / Bristol Avon and Gauze Brook systems.	A cumulative hydrological assessment covering all Order-limit land draining to each receiving watercourse: (a) combined controlled discharges and any residual field-scale runoff change at the confluence points; (b) timing/coincidence of peaks from multiple outfalls on the same ditch or Main River reach; (c) construction-phase cumulative sediment loading and dewatering discharges where site and CRC works overlap (cOEMP WMP interface); (d) in-combination effect with other consented solar/BESS schemes in the same water bodies; (e) confirmation that WFD status of the Sherston Avon (Poor) is not further deteriorated.	Demonstrate that the Scheme as a whole, not merely each parcel, causes no increase in flood risk or deterioration downstream.	Additional	Construction, Operation	Cumulative assessment report accepted by LLFA and EA before close of Examination; outfall coordination schedule appended to the detailed Drainage Strategies.	Req 11 (add cumulative demonstration as a pre-condition); Req 13; SoCG.	NPPF 173(c) (no increase elsewhere); PPG Flood Risk (cumulative impact); NPS EN-1 4.3 (cumulative effects) and 5.8; WFD Regulations 2017; CP67; LFRMS.	High	Open	
LLFA-HFD-30	Operational Flood Response Plan (BESS, substations, access)	MRM Table 3-5 tracker stow row (p.69); cOEMP Table 5 Flood Risk Management Action Plan (construction only, pp.38-39); Outline BSMP REP3-106 (not in bundle); EXAM/9.32 2.8.1-2.8.2	Trackers stow horizontally in floods; construction-phase Flood Risk Management Action Plan tied to EA Flood Warnings; no operational-phase flood response plan.	Operational Flood Response Plan for the 60-year life covering: (a) trigger levels (EA Flood Alert/Warning for Gauze Brook and Sherston Avon; Met Office amber/red rain; site rain gauge >30 mm/24 h; telemetered water-level sensor at the BESS compound); (b) pre-planned actions - BESS electrical isolation criteria, penstock closure (HFD-18), tracker stow confirmation, closure of floodplain access tracks; (c) safe access/egress route above the 1%+71% level for O&M and Fire & Rescue staff; (d) post-event inspection within 48 h - silt and debris clearance from tracks, fence lines and SuDS, electrical inspection of any CU in a flooded area, photographic record; (e) annual rehearsal and review after any activation.	Ensure essential infrastructure and personnel remain safe, and drainage/containment functions are restored, during and after flood events.	Additional	Operation	Plan approved before energisation of the BESS; activation log and post-event reports submitted to LLFA within 28 days of each activation.	Req 14 (OEMP); Req 6 (BSMP cross-reference); Req 5.	NPPF 173(a) & (c) (safe for lifetime, safe access); PPG Flood Risk (emergency planning, safe access and egress); NPS EN-1 5.8; CP67.	Medium	Open	
LLFA-HFD-31	Internal access tracks - specification and ditch crossings	MRM Table 3-5 access track rows (pp.71-72: permeable tracks; avoid crossing drainage ditches 'where practicable'); cOEMP Table 5 p.29; Appx 11-2 3.2.6 (tracks not treated as positively drained)	New tracks permeable and at existing ground level where practicable; ditch crossings avoided where practicable; runoff to gravel trenches/French drains.	Track specification fixed in the detailed Drainage Strategy: (a) no-fines / open-graded aggregate on geogrid, maximum 150 mm above existing ground, with cross-falls to vegetated margins and cut-off grips at maximum 50 m centres on gradients >3%; (b) an Access Track Ditch Crossing Schedule listing every track/ditch or track/flow-route interface; (c) each crossing to be clear-span or a pipe/box sized to convey the 1:100 +45% CC flow with 0.3 m freeboard and no more than 50 mm afflux, minimum 450 mm diameter, with headwalls and trash screens, approved by the LLFA under Part 9; (d) no permanent culvert longer than 10 m; (e) existing farm tracks retained for construction traffic only where a condition survey confirms no drainage damage.	Prevent tracks from acting as flow barriers or impermeable catchments and secure LLFA control of every ditch crossing.	Additional	Construction, Operation, Decommissioning	Crossing schedule and standard details approved before commencement of tracks; as-built survey of every crossing; culvert inspection annually and after floods in the SuDS maintenance plan.	Req 11; Req 5; Protective Provisions Part 9 (HFD-12); Req 20.	LDA 1991 s.23; CP67; LFRMS (presumption against culverting); CIRIA C753 Ch.11 (previous pavements) & Ch.28; NPPF 175.	Medium	Open	
LLFA-HFD-32	Ordinary watercourse and riparian corridor maintenance (whole site)	MRM Table 3-5 8 m buffer rows (pp.70, 73-74); OLEMP 1.3.133 (ponds), Table 5 (ditch buffers), 1.4.4 (5-yearly monitoring); Appx 11-2 3.12	Buffers and riparian corridors established; SuDS maintenance by operator; no allocation of maintenance responsibility for the ordinary watercourse network within the Order limits.	Ordinary Watercourse Maintenance Schedule appended to the SuDS Maintenance Plan: (a) register of every ditch, culvert, headwall and trash screen within the Order limits with riparian owner identified (undertaker where it holds the land or an option/lease); (b) annual condition survey (Sept) and clearance of vegetation, silt and debris to maintain design capacity, with arisings kept out of the 8 m buffer; (c) culvert CCTV/inspection at 5-year intervals; (d) obligation on the undertaker to carry out maintenance where the riparian owner defaults; (e) reporting to the LLFA annually for Years 1-5 then on request; (f) hand-back inspection at decommissioning.	Secure conveyance of the receiving watercourse network for the operational life and prevent transfer of maintenance burden to landowners or the LLFA.	Additional	Operation, Decommissioning	Register and first survey submitted with the detailed Drainage Strategy; annual statement of maintenance.	Req 11; Req 14; Req 20; Protective Provisions Part 9.	LDA 1991 s.21-s.25 (riparian obligations / LLFA enforcement); FWMA 2010; LFRMS; CP67; C753 Ch.32.	Medium	Open	