

Lime Down Solar Park

**Planning Inspectorate Reference:
EN010168**

**Wiltshire Council Responses to Action Points
Arising from the Hearings**

Deadline 7 (2 October 2026)

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1. Issue Specific Hearing (ISH5): Action Point Responses

Action Point 1: To provide comments on the Applicant's updated Tranquillity Assessment [REP5-099]

Background Context

- 1.1 The council provided comments on the Applicant's submitted '9.2 Tranquillity Technical Note' [PDA-010] within its Written Representation [REP1-138] Paragraphs 5.19 to 5.23 inclusive. The council highlighted that the Tranquillity Technical Note represented little more than repetition of previous text taken from other ES chapters, serving as a signposting document to the existing assessment of noise and vibration presented at ES Vol 1, Chapter 14, 6.1 [APP-066] the primary purpose of which was to identify significant noise effects impacting human health under the remit of public protection / statutory nuisance and not tranquillity. Therefore, the council's view was that the scope and recommended assessment parameters were established outside the landscape remit and could not be reasonably considered to represent a tranquillity assessment.
- 1.2 The council stands by its comments [REP1-138] Paragraphs 5.19 to 5.23, in that the 'Tranquillity Technical Note' [PDA-010] doesn't attempt to answer the fundamental question relating to how the potential noise sources from the proposed construction to decommissioning is going to affect the landscape as a resource, or the resulting experiential effects for receptors (residents and visitors) within the receiving landscape.
- 1.3 Following specific concerns raised by the CNLB regarding routing of construction traffic along roads within the CNL and its setting, questioning how the CNL's special quality of 'tranquillity' had been assessed in the LVIA, the Applicant subsequently prepared and submitted into examination at Deadline 5 a further tranquillity assessment [REP5-099] Tranquillity Assessment – Effects of Construction Traffic on the Cotswolds National Landscape (August 2026) Revision 1'.
- 1.4 The council has reviewed this document [REP5-099] and provides the following comments, as requested by the ExA at ISH5 for Action Point 1.

Methodology

- 1.5 The council notes this is a new document introduced into the examination, rather than an updated or revised document as initially described. The scope of this tranquillity assessment is specific to, and focuses on, the potential for likely resulting significant effects upon the baseline tranquillity levels of the CNL and its setting arising from increased traffic movements along public roads proposed to serve as construction routes to Lime Down Areas A, B and C.
- 1.6 Unlike the Applicant's previous considerations of relative tranquillity within earlier ES submissions, this additional report does consider aural, visual and

perceptual / experiential aspects of tranquillity which is welcomed by the council.

- 1.7 The council notes at paragraph 2.4.16 that the CNL Board considers the setting of the CNL to include Lime Down areas A, B and C, including the Fosse Way in proximity to these areas. This is a view shared by the council but which the Applicant disagrees. However, the council notes the Applicant has undertaken its assessment of tranquillity on this larger CNL setting area basis, seeking to address the CNL Board's concerns, but without prejudice to their own position on this matter.
- 1.8 The council notes the 'tranquillity baseline' included at Section 4, and the suite of supporting figures (1 to 12) produced to aid the review of tranquillity.

Baseline Tranquillity of the CNL in proximity to Lime Down Areas A, B and C

- 1.9 The council generally concurs with the assessment's baseline findings as presented in the summary 4.2, that the edge of the CNL including its setting for the purpose of the assessment comprising Lime Down Areas A, B and C are subject to **High** levels of relative tranquillity. Many positive landscape (fabric) components add to the experiential qualities of tranquillity, which remains largely unaffected by the presence of the railway line and frequent local minor roads due to infrequent or relatively little traffic overall. These higher baseline relative tranquillity levels are also supported by small settlements and dispersed farmsteads and the absence of industry and other negative landscape components such as major infrastructure (e.g. roads and pylons) and commercial scale development.

Baseline Tranquillity of the Construction Route

- 1.10 The council generally concurs that relative tranquillity baseline levels along the schemes construction route decreases with distance from Lime Down Areas A, B and C, and agrees with the Applicant that the wider landscape south of Grittleton and along the remainder of the proposed route, whilst sensitive, is already influenced by noise and movement along the busier strategic roads, such as the A46 and the M4 Motorway, and sources of artificial light pollution impacting dark skies south of Grittleton from busier connecting road infrastructure connecting higher concentrations of village settlement and higher levels of traffic and lighting. Despite this, many positive landscape fabric components are also present within the landscape baseline, which contribute important aspects of experiential tranquillity to wider character.

Construction Route Assessment

- 1.11 The construction route assessment, included at section 6 [\[REP5-099\]](#) has been broken down into two distinct route sections and assessed on this basis, for construction, operation (and replacement activities), and decommissioning phases. These are;

- Site A Entrance to Grittleton Village

- Grittleton Village to M4 (Junction 18).

Site A Entrance to Grittleton Village

- 1.12 The route extends from Lime Down Site A Entrance, southeast to the junction with Fosse Way, extending southwest along the Fosse Way before turning south onto Alderton Road to the crossroads located at the western edge of Grittleton Village.
- 1.13 The council agrees with the Applicant's baseline assessment, that this section of the construction route has **high relative tranquillity** when vehicles are absent.
- 1.14 The council highlights "Visual and perceptual effects of road traffic management and signage including directional signage to site's A, B and C along the route, including the minor loss of road verges to create formal HGV passing places and works to facilitate AIL's along existing narrow rural roads" to be an **additional negative visual and perceptual aspect** of the scheme to those currently identified in Tables 6-2; 6-3; 6-4; 6-5 and 6-6 [\[REP5-099\]](#) which the assessment has not identified within its assessment assumptions.

Scheme Assessment

- 1.15 The council concurs with the assessment, that baseline relative tranquillity levels experienced along this section of the route are **High**, and that these would be reduced to **Medium to Low** during construction hours for the construction phase of the scheme.
- 1.16 The council also concurs that relative tranquillity levels of the scheme in combination with the construction route would reduce relative tranquillity levels further, from a **High** relative tranquillity baseline level to a **Low** tranquillity level along this section of the route during construction hours, and that outside hours of construction, relative tranquillity levels would likely increase to **Medium**.
- 1.17 The council also agrees with the assessment of effects for the scheme's operational phase. That adverse visual effects on tranquillity will be at their greatest during the construction phase nearing the completion of the scheme without the benefit of visual screening. That noise of construction activity and vehicular movements would cease at operation, except for staged operational phase replacement activities, where similar effects to the construction phase are likely to be experienced in terms of reduced relative tranquillity, but for shorter time periods and to a lesser physical, audible and visual extent.
- 1.18 At decommissioning the council agrees that relative **High** tranquillity levels will be reduced to **Medium to Low** levels along this section of the route during construction hours. The council also considers that following completion of decommissioning stage activities relative tranquillity levels would likely return to the baseline **High** level.

Grittleton Village to M4 Junction

- 1.19 This section of the route extends from the crossroads west of Grittleton Village, extending west to the junction at the Gibb, passing under the M4, west along the B4039 to Burton, north towards Acton Turville and west to Old Sodbury along the B4040, A46 South to Junction 18 of the M4 Motorway.
- 1.20 The council agrees with the baseline conclusions for this section of the route which has assigned a **Low to Medium** level of relative tranquillity, noting that relative tranquillity levels increase with distance from the motorway and its audible and visual (limited) background disturbance.
- 1.21 The council notes the relative tranquillity level is assessed to be maintained as **Low to Medium** during construction and decommissioning phases for this section of the route.
- 1.22 Operational effects of the scheme are agreed to be not particularly relevant for this section of the route, as Lime Down sites A, B and C have no visual and little audible connection to this part of the construction route, with the exception of increased traffic movements extending duration of noise in connection with the operational activities for the periodic solar panel and battery unit replacements, where similar effects to the construction phase are likely to be experienced along this route section. The council acknowledges these effects would be experienced over shorter time periods.

Public Rights of Way

- 1.23 The council agrees with the Current Baseline Assessment, in that the current baseline has a **High level** of relative tranquillity with minimal negative effects upon tranquillity anticipated once the current Network Rail works cease within Lime Down Area C.
- 1.24 The council highlights “Visual and perceptual effects of road traffic management and signage including directional signage to site’s A, B and C along the route, including the minor loss of road verges to create formal HGV passing places and works to facilitate AIL’s along existing narrow rural roads” to be an **additional negative visual and perceptual aspect** of the scheme to those currently identified in Tables 7-2; 7-3; and 7-4; [\[REP5-099\]](#) which the assessment has not identified within its assessment assumptions.
- 1.25 The council also agrees that the effects of construction of the Scheme on the PRoW network would be more impactful both visually, perceptually, experientially and aurally than those only connected with just the construction route. The resulting effects of construction activities will be heard near the boundaries of the CNL, both within the designation itself and outside it within its setting, and visibility of these works will be possible along Alderton Road / Church Lane and the Fosse Way and also along the minor road linking the Fosse Way to the construction entrance for Lime Down A.

- 1.26 Noise from construction phase activities including movement across the landscape whether that be from internal site construction traffic within fields or increased movements along the construction route itself to the Lime Down site A entrance from Grittleton will contribute to changing the character and relative tranquillity of the landscape along the edges of the CNL and within the setting of the CNL, which will be experienced by users engaged in recreation using the PRow network routes that pass through Lime Down Areas A to C or in proximity to the scheme.
- 1.27 The council does not agree that the construction route itself linking the entrance to site A with Grittleton crossroads would have a **Low** impact upon tranquillity of the CNL for PRow users or cyclists or horse riders using the PRow network including along local roads during the construction phase. This is due to the existing baseline with **high** levels of relative tranquillity, where even a modest change would likely be highly perceptible to PRow receptors engaged in informal recreation activities. The council considers that a **Medium** impact upon tranquillity is a more realistic assessment for the construction route itself upon the PRow network.
- 1.28 It is agreed that the in-combination effects of Construction activities across the Lime Down Sites A to C together with the effects of the construction route (between Grittleton Crossroads and the entrance to Lime Down Site A) would reduce relative tranquillity levels from the existing **high** baseline level to a **low** tranquillity level during construction hours.
- 1.29 The council is unable to agree that the relative tranquillity levels for PRow receptors close to the southern and eastern boundaries of the CNL and within the CNL's setting could maintain relative tranquillity at **Medium to High** levels during the scheme's construction phase. The greatest audible and visual disturbance to baseline relative tranquillity levels would be experienced by receptors during the construction phase which the council considers would result in **Low to Medium** tranquillity for receptors.
- 1.30 The council generally agrees with the assessment of effects for the scheme's operational phase. Adverse visual effects on tranquillity will be at their greatest during the construction phase nearing the completion of the scheme and without the benefit of visual screening. That noise of construction activity and vehicular movements would cease at operation, except for staged operational phase replacement activities, where similar effects to the construction phase are likely to be experienced by receptors in terms of reduced relative tranquillity, but for shorter time periods and to a lesser physical, audible and visual extent, which would result in **Low to Medium** tranquillity, possibly increasing to **Medium** beyond year 15 as visual screening increases.
- 1.31 At decommissioning, the council agrees that relative **High** tranquillity baseline levels will be reduced to **Medium to Low** levels along this section of the route during construction hours. The council also considers that following completion of decommissioning stage activities, relative tranquillity levels experienced by receptors would likely return to the original baseline **High** level.

- 1.32 The council does not agree that following decommissioning tranquillity levels would increase above the original baseline levels, simply due to the increase of matured vegetation associated with the scheme, factoring that the baseline relative tranquillity level is already **High**.

Conclusion

- 1.33 The council notes that the assessment doesn't include an assessment of the significance of the assessed effects for baseline relative tranquillity. The council considers that there will be **Major Adverse (significant)** effects to baseline tranquillity levels experienced by receptors. These will arise from the construction activities associated with Lime Down Areas A, B and C, within the setting of the CNL in combination with increased traffic noise and visual disturbance along the section of the construction route extending between Site A and Grittleton Village during the construction and operation phases (early years and replacement activities), and also during the decommissioning phase.
- 1.34 The council accepts that the combined effects of the construction route and the construction of the scheme on the tranquillity of the CNL along its boundary and within its setting would likely be a **short-term Major Adverse Significant** effects, lasting for up to two years, which at the end of the construction phase would reduce in significance, returning the aural baseline to similar pre-development level/s, notwithstanding the additional adverse visual and perceptual effects from the scheme that would remain present beyond the construction phase, potentially up to year 15 operation and beyond, and which would persist well into the operational phase to negatively impact the baseline tranquillity levels for receptors within and around the CNL's eastern and southern boundaries and wider land considered to comprise the setting to the CNL in proximity to Lime Down Areas A, B and C.

Action Point 3: To provide specific details of where sensitivity and / or magnitude of change has been downplayed in the sequential visual assessment and the implications that this would have on the conclusions on the assessment

Route Specific Comments

WC Route 1A

- 1.35 In respect of the viewpoints, the majority are single direction and do not convey a genuine sequential journey through the receiving landscape.
- 1.36 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 are 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.

- 1.37 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.
- 1.38 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** (significant) throughout the construction, operation and decommissioning phases.

WC Route 1B

- 1.39 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 the assessment 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.
- 1.40 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, operation, and decommissioning phases.

WC Route 2

- 1.41 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 loss and closing down of the characteristic open views.

- 1.42 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.
- 1.43 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 (largely due to highly questionable (lower) magnitude of change levels, used within the Applicant's assessments, which the council considers are simply not credible, in the context of this scheme and receiving landscape.
- 1.44 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. The council contends that, 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**.
- 1.45 The Applicant's assessments of the decommissioning phase effects are simply not credible in the council's view. The council considers that construction phase and operational phase effects are not assessed on worst case scenarios, or with the correct higher, magnitude of change to be reasonably anticipated for a development of this nature and scale, spatial influence and location, when assessed against the existing landscape and visual baseline conditions.
- 1.46 The council does not accept that the LVIA identifies or presents a full, transparent or credible assessment of likely significant effects to be reasonably anticipated to arise from a development of this scale and nature at this location and remains concerned that the significance of harmful landscape and visual effects have been underestimated, while beneficial landscape effects have been overestimated by the Applicant. The assessment's lack of clarity and confusion on what separates a visual mitigation measure from a genuine landscape enhancement measure remains, which further compounds the council's concerns over the efficacy of the Applicant's landscape and visual assessment being relied upon to inform matters of environmental landscape and visual 'harm and benefit' to be considered within the wider planning balance by the determining authority.

Action Point 10: Parties to progress discussions on the outline Archaeological Mitigation Strategy (oAMS) and clarify:

- **The specific details and measures that need to be included in the oAMS to address outstanding concerns,**
- **Any proposed alterations to the wording of Requirement 12.**

- 1.47 Wiltshire Council's Archaeology Service (WCAS) have held extensive discussions with the Applicant's archaeological consultants regarding the Archaeological Mitigation Strategy. To date the Applicant's consultants have prepared an Outline Archaeological Mitigation Strategy (OAMS), which has been approved by WCAS. However, WCAS maintained their requirement for the LPA to approve a Detailed Archaeological Mitigation Strategy (DAMS), to be prepared by the Applicant prior to the determination of the application.
- 1.48 The Applicant has not prepared a DAMS during examination and following discussions between WCAS and the Applicant, the Applicant has stated that they will not agree to commit to producing one via Requirement 12 section (2).
- 1.49 WCAS consider a 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.
- 1.50 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.
- 1.51 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.

- 1.52 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'

Action Point 14: To update their SoCG regarding:

- Hydraulic modelling for the Gauze Brook
- Reflect the hearing conversation regarding the functional floodplain
- Reflect the conversation regarding the ordinary watercourse between fields D22 and D1
- To add an item in the SoCG on better rate understanding and agreement

- 1.53 The council's SoCG with the Applicant has been updated at Deadline 7.

Action Point 16: To submit a review of the NPS EN-1 policy position, specifically paragraphs 5.8.12, 5.8.15(8) and 5.8.32 on the implementation of Natural Flood Management measures as part of the post hearing submission.

- 1.54 Wiltshire Council considers that the Applicant has broadly considered Natural Flood Management, soil-management, vegetation-management, watercourse-buffer and runoff-management measures in a manner consistent with the broad intent of NPS EN-1. However, the council's remaining interest is ensuring that the detailed DCO-approved plans clearly demonstrate how the hydrological risks identified through the assessment are supported by appropriate mitigation measures and how those measures are secured, implemented, maintained and adapted throughout the lifetime of the Scheme.
- 1.55 The council does not interpret NPS EN-1 as creating a requirement for quantified flood-risk betterment or further strategic catchment-scale modelling where the Applicant has demonstrated that the Scheme will not increase flood risk elsewhere. Nevertheless, the council considers that NPS EN-1 supports the ongoing consideration and implementation of reasonable and proportionate measures relating to vegetation establishment, soil management, watercourse buffers, source-control measures, runoff management and wider hydrological resilience where appropriate.
- 1.56 In the council's view, compliance with NPS EN-1 is therefore linked not only to the assessment itself, but also to the effective implementation and long-term management of the mitigation measures relied upon within the Flood Risk

Assessment and Drainage Strategy, the environmental management plans and the Mitigation Route Map.

2. Issue Specific Hearing (ISH6): Action Point Responses

Action Point 9: Provide a plan to the Applicant (and submit into the examination) highlighting areas on Fosse Way where the council's highways department considers that improvements to facilitate two HGV's passing should be considered by the Applicant, including details of the type of improvements sought from the Applicant

2.1. The council have included two plans at Appendix A to this response comprising:

- Fosse Way (South) – West Dunley Cottages to Railway Bridge; and
- Fosse Way (North) – Railway Bridge to Junction with U/C Road to Sherson.

2.2. The additional HGV passing place provision, which the council considers is required pre-construction, are illustrated by the Green Lines on these plans.

2.3. These plans should be viewed in conjunction with the written comments and reasoning provided within the Wiltshire Council Deadline 7 response of its comments on Submissions at Deadline 6 and Deadline 6B.

3. Issue Specific Hearing (ISH7): Action Point Responses

Action Point 2: To progress discussions regarding the heads of terms for the community liaison group (CLG) and confirm where there is agreement on the extent to which the CLG should be consulted on the content of management plans prior to discharge of requirements.

Where agreement is not reached, each party is asked to provide its preferred wording for the heads of terms and requirement 4 of the draft DCO.

- 3.1. The Applicant provided the council with the initial draft Outline Terms of Reference (ToR) for the Community Liaison Group (CLG) on 24 September 2026. Following review, the council's feedback was discussed with the Applicant at a meeting on 28 September, and a marked-up version with the council's comments and suggested amendments was sent to the Applicant via email on 29 September.
- 3.2. It is understood that the Applicant also provided the initial draft Outline ToR for the CLG to Stop Lime Down (SLD) and that feedback on the ToR was provided by SLD to the Applicant.
- 3.3. The Applicant sent a revised Outline ToR for the CLG to the council on 1 October, following consideration of the comments provided by the council and SLD.
- 3.4. Wiltshire Council welcomes the amendments that the Applicant has made to reflect the comments made by the council and SLD. The council particularly welcomes the additions confirming that the '*Stakeholder Communication Plan will be prepared in consultation with the CLG*' and that the CLG will '*review and discuss matters relating to environmental management, traffic and access, farming, equine, business and other community impacts, including community wellbeing, and corresponding mitigation, and other matters identified in the DCO and its management plans / control documents.*'
- 3.5. Whilst the council is appreciative that the Applicant has included its suggested wording relating to the maintenance of an action log in paragraphs 1.2.3(d) and 1.4.4 Undertaker (d), upon further reflection the council considers that this should just be referred to as '*a log*' rather than '*an action log*'.
- 3.6. Furthermore, the council is mindful of community concerns that the Chair is truly independent of the Applicant. Therefore, the council would support SLD's proposed revision to paragraph 1.4.4 requiring that "*The Chair shall be appointed in consultation with and by agreement of the host local authorities and the Undertaker.*"
- 3.7. However, the council was disappointed that the Applicant had removed the wording captured in the council's SoCG relating to the provision of '*ongoing wellbeing support through signposting to relevant wellbeing services and resources, consideration of community wellbeing impacts in project communications, and period review through the CLG of emerging wellbeing*

concerns and mitigation measures' at paragraph 1.4.4 Undertaker (e). Similarly, the council was disappointed that there is no explicit reference to the Stakeholder Communication Plan having suitable KPIs. The council considers that these should be strengthened in the detailed ToR and Stakeholder Communication Plan.

- 3.8. The council is also supportive of SLD's assertion that the Chair should be involved in the process for redacting commercially sensitive information from the meeting minutes (section 1.5) and that sub-groups should '*Be chaired by the Chair (or someone appointed by the Chair)*' (Appendix B, Governance and Reporting (b)).
- 3.9. Furthermore, whilst the addition which states, '*To ensure that the CLG is able to engage in design related matters, the CLG must be established prior to the submission of details for approval pursuant to Requirement 5 of the DCO*' is welcomed. The council does not consider that this sufficiently captures the CLG's engagement on the detailed management plans and control documents prior to discharge, and notes that the council's suggested change in this regard has not been accepted by the Applicant.
- 3.10. The council also 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 stage.
- 3.11. 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.”

- 3.12. The Outline Terms of Reference for the Community Liaison Group should be added to Schedule 13 Certified Documents accordingly.

Action Point 20: To provide an update on discussions with the Applicant, with regards to the procurement process and ensuring Greenhouse Gas (GHG) emissions are kept to a minimum throughout the life of the proposed development.

- 3.13. No further detailed discussions have taken place with the Applicant with regard to procurement.
- 3.14. In the ISH7 hearing (part 3), the Applicant said that the procurement processes are conducted through certain frameworks, aligning with the company's ESG requirements and they would be looking for a low emissions supply chain where possible.
- 3.15. The council suggests that the assurance needed is that the tender will follow best practice in terms of climate impacts and opportunities, e.g. it will have certain questions about GHG emissions of the contract-specific materials and operations and how the contractor will avoid or reduce emissions throughout the lifetime of the contract, and the process is clear that information on carbon emissions will form part of the evaluation of the tenders. This would then be followed up by including requirements and KPIs in the contract, that would be supported by reporting of actual carbon emissions, relevant and proportionate to what the contract is delivering.
- 3.16. In this way the information provided in the ES Chapter 7, which is based on estimated emissions, can be tested and built upon, and the project can achieve transparency about its carbon emissions. Through this process, the GHG emissions attributed to the project, will be mitigated and reduced as much as possible and will be clearly and transparently shown.
- 3.17. The specific mitigation measures and requirements included in the management plans would be built into operation practices and could form part of the contract requirements as well.
- 3.18. It is the council's understanding that the Applicant for Deadline 7 has built upon the existing text within the Outline OEMP to state:

“The Operator shall maintain appropriate corporate governance, procurement and supplier management procedures throughout the operational lifetime of the Scheme. Where practicable, suppliers and contractors engaged in the operation and maintenance of the Scheme shall be required to comply with the Operator's relevant policies and procedures relating to carbon emissions, environmental, social and ethical business practices.”

Action Point 27: To provide comment on the Applicant's proposal to inform them of replacement activities equally or exceeding 10% of any total components.

- 3.19. Wiltshire Council concurs with the Applicant's proposal to inform the council of any replacement of 10% or more of either the BESS units or Solar PV panels. The council notes that this commitment was included within the Outline Operational Environmental Management Plan [\[REP5-074\]](#) submitted as part of the Applicant's Deadline 5 response.
- 3.20. The council recognises that there is always a fine line to be tread on how far / much the council can realistically be involved or notified of such things, given the context of limited resources, therefore the council considers this approach to satisfactory resolve the council's previously highlighted concerns.

Action Point 35: To provide specific measures WC is seeking with regards to soil management on a strategic level.

- 3.21. Within 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 demonstrate the Applicant does not have a clear idea in principle where these would be located to allow their eventual re-use at decommissioning.
- 3.22. 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.
- 3.23. 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.
- 3.24. 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.

3.25. 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.'

3.26. 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."

3.27. 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 really hasn't given this issue much thought at all 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.

3.28. 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.

3.29. From a flood and drainage perspective, the LLFA's interest is in ensuring that the detailed SRMP provides a strategic approach to identifying and managing soil-related hydrological risks across the Scheme. In particular, the detailed SRMP should:

- Identify hydrologically sensitive locations where soil condition is particularly important to runoff generation, infiltration performance, erosion resistance or drainage connectivity.
- Identify higher-risk soil conditions, including areas susceptible to compaction, ponding, erosion, surface runoff concentration or reduced infiltration.
- Explain how soil-management measures will be targeted towards areas subject to repeated trafficking, construction disturbance or ongoing maintenance activity.
- Establish a clear process for identifying, investigating and remediating soil deterioration where observable indicators such as ponding, rutting, erosion, vegetation decline or altered runoff behaviour occur.
- Explain how soil-management measures interact with vegetation-management, drainage and runoff-management measures secured through the CEMP, OEMP, LEMP and Water Management Plan.
- Define responsibilities, review procedures and remediation arrangements to ensure that soil-related hydrological risks are managed consistently throughout construction, establishment and operation.
- Ensure that soil-management measures remain aligned with the flood-risk, drainage and water-environment outcomes relied upon by the Flood Risk Assessment and Drainage Strategy.

3.30. The Applicant has established a substantial framework for soil monitoring, investigation and remediation. The remaining requirement is to demonstrate, through the detailed SRMP and associated plans, how soil-related hydrological risks are identified, how mitigation measures are targeted towards the locations and activities most likely to affect runoff behaviour and infiltration performance, and how those measures integrate with the wider flood-risk, drainage, vegetation-management and water-management framework.

Action Point 36: To confirm if they are satisfied with the Applicant's response at Deadline 6 (DCO2.1 ak [REP6-060]), in which they state 'Guidelines for monitoring the soil resource during construction and operation will be included in the detailed SRMP' or would WC prefer to have this information available now, as part of the examination process. If the latter, please provide justification for this request.

- 3.31. Wiltshire Council is satisfied with the Applicant's response at Deadline 6 [[REP6-060](#)] that detailed guidelines for monitoring the soil resource during construction and operation will be included within the detailed Soil Resources Management Plan.
- 3.32. The council considers that the Outline Soil Resources Management Plan (Rev 5) [[REP6-035](#)] already provides an appropriate framework for soil-condition assessment, compaction monitoring, Visual Evaluation of Soil Structure (VESS), investigation of ponding, remediation measures and post-remediation review. The council also notes that soil-management measures are integrated with the wider drainage and environmental management framework through the Outline Construction Environmental Management Plan (Rev 7) [[REP6-030](#)], Outline Operational Environmental Management Plan (Rev 7) [[REP6-032](#)], Outline Landscape and Ecological Management Plan (Rev 4) [[REP6-038](#)], the Flood Risk Assessment and Drainage Strategy suite [[REP4-021](#) to [REP4-036](#) and [REP3-063](#)] and the Mitigation Route Map [[REP5-102](#)].
- 3.33. The council does not consider it necessary or proportionate for the detailed soil-monitoring methodology to be provided during the Examination. Detailed monitoring methodologies, monitoring frequencies, monitoring locations, reporting arrangements and remediation procedures should be informed by the final design, construction methodology, construction phasing, access arrangements and site-specific conditions, which are not yet available.
- 3.34. The council's remaining interest is ensuring that the detailed SRMP clearly demonstrates how the soil-management measures relied upon by the Flood Risk Assessment and Drainage Strategy suite [[REP4-021](#) to [REP4-036](#) and [REP3-063](#)] and associated management plans are implemented, monitored, reviewed and maintained, including arrangements for investigation, remediation, corrective action and post-remediation review where required.
- 3.35. The council also recognises that detailed design, construction activity and implementation may identify site-specific issues that cannot reasonably be fully defined at the outline stage. The detailed SRMP should therefore explain how soil-related issues identified through inspections, monitoring or implementation of the approved development will be investigated, managed and, where necessary, remediated through the established review and corrective-action procedures.
- 3.36. Accordingly, Wiltshire Council does not seek the detailed soil-monitoring methodology at this stage and considers that these matters can appropriately be addressed through the detailed SRMP approval process secured by the Draft Development Consent Order (Rev 6) [[REP6-006](#)].

4. Issue Specific Hearing (ISH8): Action Point Responses

Action Point 18: At ISH5, the Council advised it agreed ‘no harm’ to the setting of Grittleton House in heritage terms providing that there would be sufficient socio-economic mitigation measures.

The Council is asked to confirm whether the agreed mitigation measures by the time of deadline 8 are sufficient to agree to ‘no harm’ in heritage terms to Grittleton House.

- 4.1. Without an agreed business compensation fund for businesses like Grittleton House to have recourse to in the event of a downturn in bookings due to the impact of the proposed scheme, with the proposed compound being the primary factor, the council is unable to confirm that in the longer term, should the business become unviable or not have the funds to continue investment in the upkeep of the heritage asset, that ‘no harm’ would be the eventual outcome.
- 4.2. The council appreciates the efforts the Applicant has gone to with other mitigation measures following the meeting and subsequent hearing but remain unconvinced these will be sufficient.

Action Point 21: To submit agreed position with WC and ICB following the ICB submission at D6 [REP6-079]

- 4.3. Representatives from Wiltshire Council, the Integrated Care Board and the Applicant met on Friday 25 September to discuss matters relating to Human Health.
- 4.4. Following the meeting, the Applicant’s team prepared a Position Statement, which has been reviewed and amended by the parties.
- 4.5. The Position Statement will be submitted by the Applicant at Deadline 7.

5. Issue Specific Hearing (ISH9): Action Point Responses

Action Point 1: Both the Applicant and the Council to confirm if article 9(3) is still required if protective provisions have been agreed.

The Council to also advise if the agreed protective provisions now supersede the Council's request for Article 9 to be reworded as per its request in [REP4-092]

- 5.1. Wiltshire Council's position on Article 9 has narrowed in light of the Part 11 protective provisions. Those Protective Provisions now deal with the practical interface for road works and cable works, including programme, detailed design, road-space bookings, permit applications, traffic management and phasing.
- 5.2. As drafted, Article 9(3) gives the undertaker a separate right to take any permit refusal or permit condition into the Schedule 16 requirement-discharge appeal procedure.
- 5.3. Wiltshire Council does not now consider Schedule 16 to be the right mechanism for permit decisions or for matters governed by the local highway authority protective provisions.
- 5.4. The protective provisions now contain a deemed refusal and dispute resolution procedure that should govern any appeals required with respect to permits.
- 5.5. Therefore, the council agrees that that Article 9(3) should now be deleted, or made expressly subject to Part 11 of Schedule 15 and the permit scheme's ordinary mechanisms.
- 5.6. 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.

Action Point 2: To confirm if they have any outstanding issues with article 16

- 5.7. The council maintains its previous submissions, namely:
 - Wiltshire Council Response to the ExA's Second Written Questions (ExQ2) [[REP5-112](#)]; and
 - Wiltshire Council Post Hearing Summaries and Responses to Action Points Arising [[REP4-092](#)].
- 5.8. The four-week period in Article 16(5)(a) is insufficient.
 - a. Article 16 measures may affect road-space availability, diversion routes, emergency access, public transport, school traffic, local events and other planned or emergency works on the network.

- b. A four-week notice period does not provide adequate time for the traffic authority to assess those matters, coordinate with affected parties, and resolve conflicts with other network commitments.
 - c. Wiltshire Council therefore seeks an eight-week notice period, but suggest 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.
- 5.9. Wiltshire Council also considers that consent under 16(4)(b) should be expressly carved out from Article 47.
- a. Article 16 requires the undertaker to obtain the traffic authority’s written consent before exercising the temporary traffic regulation powers.
 - b. That consent should be a positive traffic authority control, not a deemed approval after six weeks.
 - c. Deemed consent is inappropriate for temporary traffic regulation measures because the traffic authority must be able to assess and, where necessary, refuse or condition proposals by reference to highway safety, network management, road-space coordination, emergency access and protection of the highway asset.
 - d. Wiltshire 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).*”

Action Point 4: Confirm if any revised drafting is required to article 41 or schedule 12 in relation to TPO7 and / or TPO8

- 5.10. Wiltshire Council considers that TPO07 should be added to Part 3 of Schedule 12 of the dDCO to provide consistency with N/TPO08.

Action Point 10: Provide suggested revisions to the mitigation routemap to the applicant, which the Council would like to see included.

- 5.11. 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.

- 5.12. 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.
- 5.13. 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.
- 5.14. 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.
- 5.15. 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.
- 5.16. Furthermore, the LLFA's required changes to the Mitigation Route Map are contained in Appendix B to this submission.
- 5.17. The council discussed the above comments with the Applicant on 28 September 2026 and shared them via email.
- 5.18. The council also requests that the further changes identified to the individual outline management plans within its comments on Deadline 6 and Deadline 6B submission are incorporated into the Mitigation Route Map.
- 5.19. The council shared its draft comments on the outline management plans and strategies as contained within its comments on Deadline 6 and Deadline 6B submission with the Applicant on 30 September 2026 via email. This comprised:
 - 7.21 Outline Battery Safety Management Plan (Rev 3)
 - 7.4 Design Principles and Parameters (Rev 4)
 - 9.59 Mitigation Route Map
 - 9.63 Permitted Preliminary Works Environmental Management Plan
 - 6.2 ES Vol 2 Figure 3-4-1 to 3-4-2 Landscape and Ecology Mitigation Plan (Rev 4) (1 of 4)
 - 6.3 ES Vol 3 Appendix 11 Flood Risk Assessment and Drainage Strategy
 - 7.12 Outline Construction Environmental Management Plan (Rev 7) – with the exception of paragraphs 15.1 to 15.3.
 - 7.13 Outline Operational Environmental Management Plan (Rev 7) – with the exception of paragraphs 16.1 to 16.3.
 - 7.14 Outline Decommissioning Strategy (Rev 5) – with the exception of paragraphs 17.1 to 17.3.

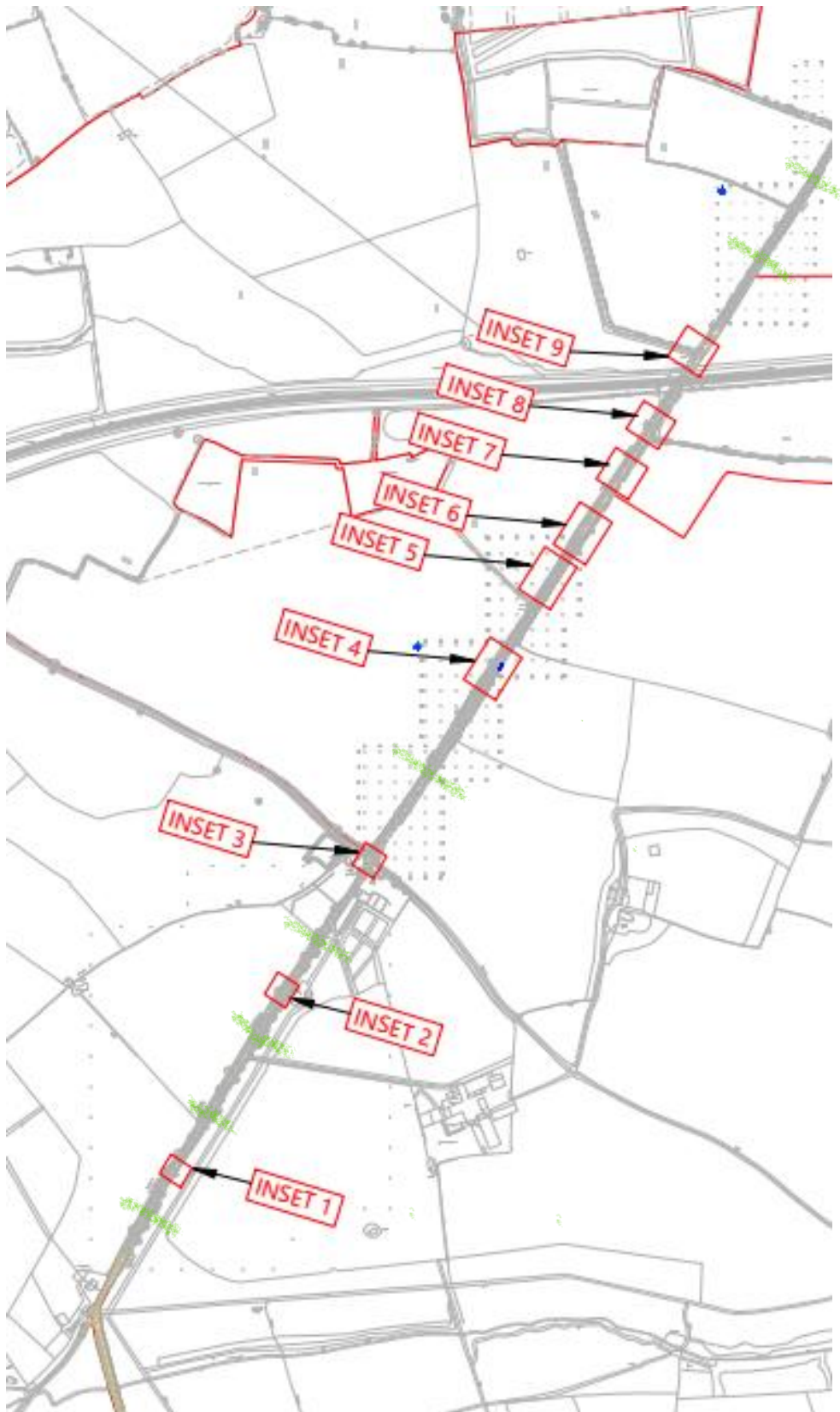
- 7.15 Outline Soil Resources Management Plan (Rev 5)
- 7.18 Outline Landscape and Ecological Management Plan (Rev 4)
- 7.19 Outline Ecological Protection and Mitigation Strategy (Rev 6) – with the exception of paragraphs 20.1 to 20.6.
- 7.22 Outline Construction Traffic Management Plan (Rev 6)

5.20. It is the council's understanding that the Applicant has reviewed these comments and consider updates that could be made to the plans as part of their Deadline 7 submission. The council will review the documents submitted by the Applicant at Deadline 7 and confirm its final position as part of its Closing Statement, which will be submitted at Deadline 8.

Appendix A

ISH6: Action Point 9

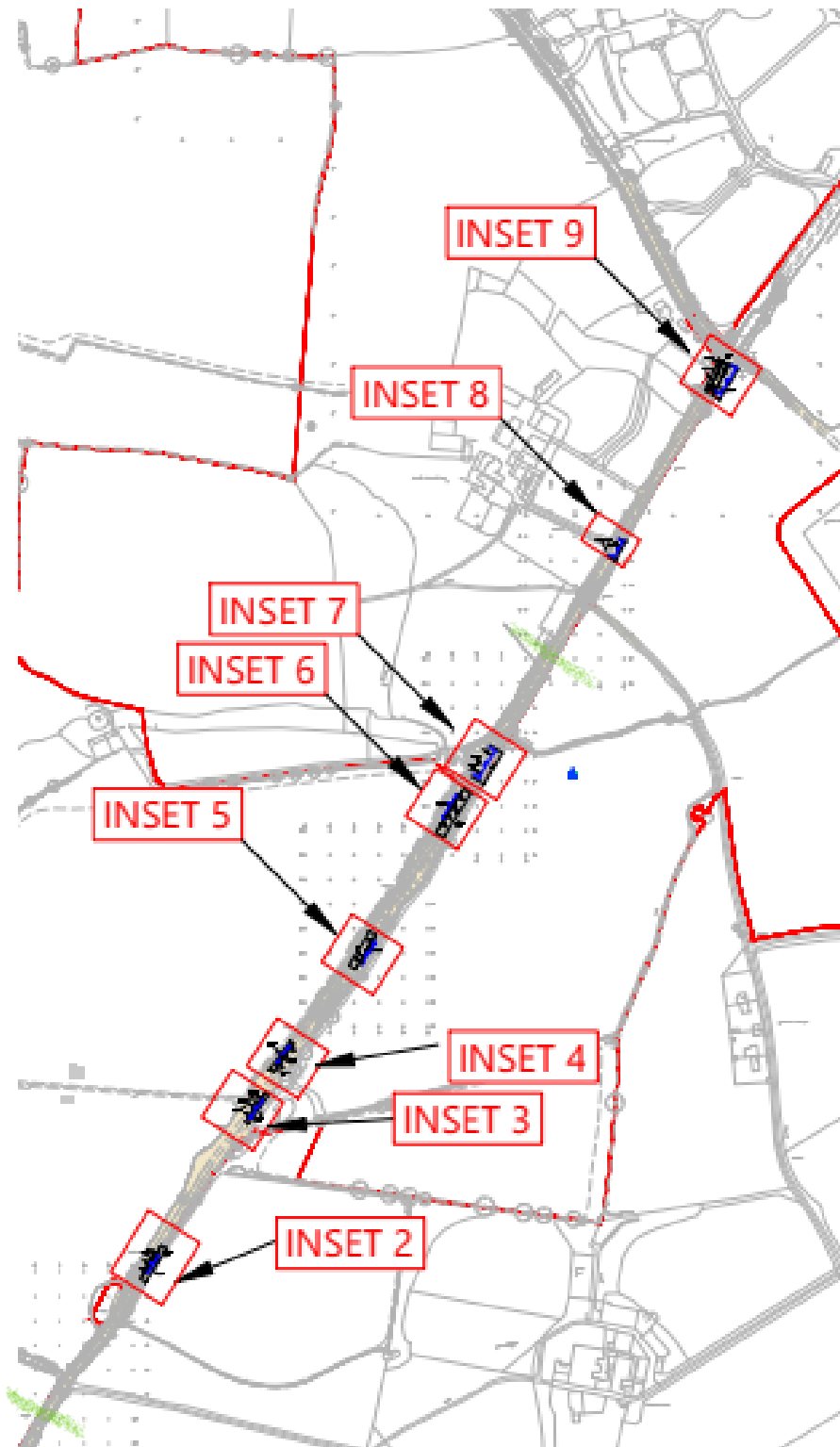
Additional HGV Passing Place Provision – Pre-Construction



Fosse Way (SOUTH) - West Dunley Cottages to Railway Bridge

Additional HGV Passing Place Provision - Pre-Construction – WC View (Green lines)

NOTE: See also written comments and reasoning in Deadline 7 WC Response



Fosse Way (NORTH) - Railway Bridge to Junction with U/C Road to Sherston

Additional HGV Passing Place Provision - Pre-Construction – WC View (Green lines)

NOTE: See also written comments and reasoning in Deadline 7 WC Response

Appendix B

ISH9: Action Point 10

LLFA Required Changes to 9.59 Mitigation Route Map

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-A8, B6-B8, 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 (OEMP) - 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/cm ³ 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 m ³ vs 338.6 m ³ ; 15 CUs = 3.1 m ³ 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 m ³ per 75 m ² unit); confirm land-take for a corrected ~1,000-1,200 m ³ 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 disappplied; '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 m ³ /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/bunded 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 SP2/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	