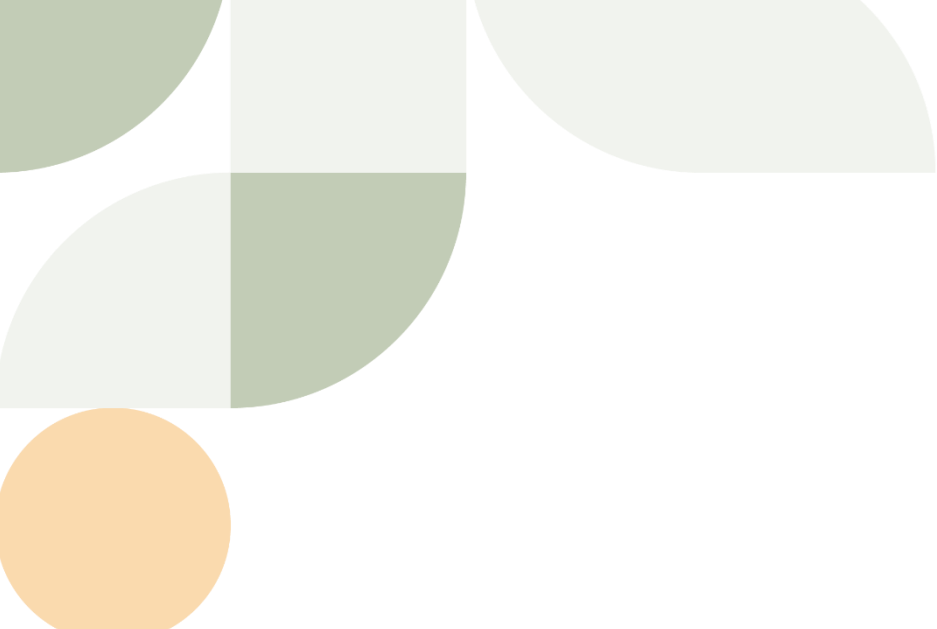




Lime Down

Solar Park

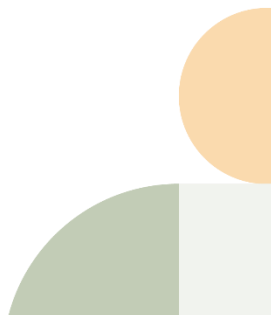
**Written Summary of the Applicant's Oral
Submissions and Responses at Issue Specific
Hearing 7 and Responses to Action Points**

October 2026

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The Infrastructure Planning (Examination Procedure) Rules 2010



List of Contents

1	Summary of Oral Submissions at Issue Specific Hearing 7	1
2	List of Actions for the Applicant and Other Parties following Issue Specific Hearing 7	45

1 Summary of Oral Submissions at Issue Specific Hearing 7

Agenda item	Comment
1. Welcome, housekeeping, purpose of the hearing, participant introductions	The ExA introduced the hearing and made some preliminary remarks. The purpose of the hearing is to explore management plans and other control documents, with the ExA inviting comments from Wiltshire Council and other Interested Parties on the contents of those documents. The following parties then introduced themselves during ISH7: The Applicant: • Claire Brodrick, Partner at Pinsent Masons LLP (solicitors for the Applicant) • Will Threlfall, Senior Project Development Manager at Island Green Power • William Barrett Technical Director at AECOM, Environment Lead • Christopher Jackson, Director of Landscape Architecture at Lanpro • Peter Timms, Associate Director at Clarkson & Woods, Ecology and Biodiversity Lead • Hannah Dennett, Associate Technical Director at Arcadis • Paul Gregory, Director at BST&T Consultancy Services • Josh Rigby, Associate Director at Arthian Wiltshire Council ("Wiltshire Council") • Odette Chalaby, Barrister Landmark Chambers (Counsel for Wiltshire Council)

	• Kate Tate, Arboriculture Officer • Mark Goodwin, Senior Landscape Officer • Rohit Singh, Principal Drainage Officer • Brett Warren, Public Protection Officer • Russell Frith, Inward Investment Manager • Lisa Price, Arboriculture Officer • Emma Fisher, Senior Ecologist • Neil Machin, Ecology Manager Stop Lime Down ("SLD") • Daniel Kozelko, Barrister at 39 Essex Chambers (Counsel for SLD) • Celia Reynolds, Barrister at 39 Essex Chambers (Counsel for SLD) • Richard Skeffington, Emeritus Professor at the University of Reading The Environment Agency ("EA") • Laura Edwards, Planning Specialist • Susie Bateson, Technical Specialist in Hydrogeology and Contaminated Land • Lucy Houghton, Surface Water Quality • Lucy Sutton, Biodiversity Officer • Philip Sale, Hydraulic Modeller • Bujor Humphries, Biodiversity Specialist National Highways ("NH") • Julie Russell, solicitor at Gowling WLG
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	Other interested parties: • Catherine d'Agrain
2. Design Principles and Parameters	Wiltshire Council indicated no fundamental concerns with the Design Principles and Parameters [REP4-043] at this hearing but raised flood-risk-related reassurance, specifically that management plans must be appropriately implemented, monitored and verified through the detailed approval process and operational management framework. Discussion on hydrological verification framework was deferred to Agenda Item 11. In response to comments from SLD regarding the concern that detailed decisions on design and management may be taken before the CLG is established, Ms Claire Brodrick confirmed the Applicant's commitment to establishing the CLG prior to commencement of construction. CLG operation would be governed by Terms of Reference (ToR) agreed with the Council and considered the ToR to be the appropriate control mechanism, rather than incorporating CLG detail within the Design Principles and Parameters [REP4-043] itself. The Applicant had shared an example ToR with the Council and was awaiting feedback. The Applicant raised programming and timing concerns regarding any fixed pre-submission consultation period with the CLG on all draft management plans and not to overstate the amount of opportunities for engagement but accepted that the CLG should allow for meaningful community involvement. The Applicant indicated a willingness to explore, via the ToR, what information could be made available to the CLG pre-submission. Ms Brodrick said she was not aware of other solar NSIP projects making draft documents available for CLG comment before discharge submission but agreed to check examples and revert to the parties. Usually for the provision of information and feedback on specific items and topics.

	<i>Post Hearing Note:</i> <i>Please refer to the Applicant's response to Action 1 in the Actions Response Table below.</i> Ms Brodrick confirmed an aim to have the ToR agreed by end of Examination. The ExA requested that by Deadline 7, the Applicant, SLD and Wiltshire Council discuss and seek to agree what matters should be provided to the CLG before discharge submissions, and what is too technical for CLG input. If agreement is not reached, parties should provide preferred drafting. The ExA acknowledged that agreement may not always be achievable and it is for the Council to approve the ToR. <i>Post Hearing Note:</i> <i>Please refer to the Applicant's response to Action 2 in the Actions Response Table below.</i> Ms Brodrick acknowledged SLD's concern that the CLG could in theory be established very late in the pre-commencement sequence (after other conditions have been discharged) and undertook to consider appropriate timing triggers but not sure prior to Permitted Preliminary Works ("PPW") appropriate. The Applicant also noted that the PPW plan requires a community liaison officer to be in place for any PPW.
3. Outline Permitted Preliminary Works Environmental Management Plan (PPW EMP) [REP5-106]	Ms Brodrick confirmed that the PPW Plan was confirmed as not an outline document and not subject to a formal approval process. In relation to necessary consents for PPW, Ms Brodrick stated that a protected species licence is the only consent that could potentially be required, but this is not envisaged. Approval of PPW does not remove the need for any other consents that may be legally required. On site clearance parameters, Ms Brodrick explained that the PPW Plan would not include specific offsets or quantified parameters, on the basis that survey needs vary and on the basis of that particular

	activity. The Applicant described the operative principle as minimisation of site clearance rather than a quantified control parameter. The ExA queried how it would be possible for someone to challenge whether site clearance that has taken place is reasonable. The ExA queried whether there should be similar limitation on artificial lighting as with materially noise-inducing activities. Mr William Barrett agreed to add a limitation on activities involving significant artificial lighting, consistent with the restriction applied to mobilisation the hour before and after core working hours. <i>Post Hearing Note:</i> <i>Please refer to the Applicant's response to Action 3 in the Actions Response Table below.</i> The ExA queried whether the Applicant is able to identify at this stage where it is anticipated that there would be PPW in the proximity of heritage assets. Mr Barrett, for the Applicant, noted that the Table 3-6 of the Outline PPW EMP [REP5-106] describes the preliminary works, a number of which are site wide, and referred to the appointment of an archaeological interface with Wiltshire Council which would mean that where locations for PPW are identified by the contractor there would be discussions with the archaeological technical officer at Wiltshire Council in relation to the PPW. In response to the ExA's comment that these measures are in relation to archaeology rather than built heritage assets, Ms Brodrick, on behalf of the Applicant, agreed to bolster wording in the Outline PPW EMP [REP5-106] to adopt principles to minimise impacts on the setting of heritage assets, including limiting any necessary storage or placement of materials in the vicinity of heritage assets to the minimum
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	time necessary. The Applicant did not agree to a complete prohibition on surveys in heritage asset settings or a specific list of restricted activities or locations as this is intended to be a general principal. <i>Post Hearing Note:</i> <i>Please refer to the Applicant's response to Action 4 in the Actions Response Table below.</i> The ExA referred to Table 3-7 of the Outline PPW EMP [REP5-106] and the measures that would be implemented where a vehicle track crosses a public right of way. The ExA asked whether these measures would apply where a vehicle track is shared with a public right of way. Ms Brodrick, on behalf of the Applicant, agreed that the Outline PPW EMP [REP5-106] Table 3.7 provisions should apply not only where a vehicle track crosses a PRow but also where a track is shared with or used by PRow users. The Applicant agreed to check whether any additional measures are required and to cross-check against the Outline Public Rights of Way and Permissive Paths Management Plan [REP1-104]. <i>Post Hearing Note:</i> <i>Please refer to the Applicant's response to Action 5 in the Actions Response Table below.</i> In response to comments from Wiltshire Council that the PPW Plan required more detail on highways management matters, Applicant agreed to provide further information, including anticipated HGV movement numbers; identification of which accesses will require HGV use; and a measure to check access suitability and protect buried services. <i>Post Hearing Note:</i> <i>Please refer to the Applicant's response to Action 6 in the Actions Response Table below.</i>
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In response to the ExA's question as to when the Applicant anticipates being able to submit the updated numbers, Ms Brodrick, for the Applicant, confirmed that an updated **Outline PPW EMP [REP5-106]** would be submitted at Deadline 7. The Applicant agreed to provide PPW HGV numbers in advance to Wiltshire Council and to SLD (Mr Bamber) to allow pre-Deadline 7 discussion, with a view to narrowing respective positions before Deadline 8 rebuttals.

Post Hearing Note:

Please refer to the Applicant's response to Action 7 in the Actions Response Table below.

Ms Chalaby noted that referencing within the **Outline PPW EMP [REP5-106]** Table 3.7 regarding the pre-condition highway survey extent was outdated. Mr Barrett confirmed that this update would be made to align with the latest version of the **Outline Construction Traffic Management Plan [REP6-041]** at Deadline 7.

Post Hearing Note:

Please refer to the Applicant's response to Action 8 in the Actions Response Table below.

The Applicant confirmed that soil management method statements are prepared by the contractor to ensure compliance input from soil expert.

In respect of Table 3.12 of the **Outline PPW EMP [REP5-106]**, the ExA queried what the process would be for the Community Liaison Manager managing complaints, including that complaints would be responded to rather than just received by the contractor.

Ms Brodrick confirmed that the Applicant would add wording on complaints handling into the **Outline PPW EMP [REP5-106]**, consistent with the complaints procedure in the **Outline CEMP [REP6-029]**.

	<i>Post Hearing Note:</i> <i>Please refer to the Applicant's response to Action 9 in the Actions Response Table below.</i> In response to comments from Wiltshire Council that an outline and approval mechanism for a detailed PPW Plan was needed, Ms Brodrick maintained that the Outline PPW EMP [REP5-106] contains all necessary commitments and that no further approval mechanism is appropriate. The Applicant accepted in principle the approach of pulling across or cross-referencing relevant EPMS method statements into the Outline PPW EMP [REP5-106] and tightening wording around tree removal and modification. The Applicant offered a commitment that no tree would be removed without local authority consent. The Applicant agreed to provide results of surveys undertaken during PPW for transparency. <i>Post Hearing Note:</i> <i>Please refer to the Applicant's response to Action 10 in the Actions Response Table below.</i> The ExA noted that for the Springwell Solar Farm DCO, there was precedent for the PWW Plan to be approved by the Council. Ms Brodrick explained that the scope of the PPW was different for Springwell and it included highway works, which is not proposed for the PPW on this Scheme. Ms Brodrick clarified that it is the creation of new accesses which would need local authority approval and this project is specifically not doing here. In response to Ms Kate Tate regarding updates requested to the arboricultural method statements of the PPW Plan, Ms Brodrick stated that if there are further things that the Council would like added to those method statements for clarity in respect of PPW the Applicant can consider these. But as a
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	fundamental principle, Applicant has to be able to carry out these works, and that's standard across DCOs, and the protection should all be in this plan without the need for further approval. Ms Emma Fisher queried whether any ecological surveys undertaken as part of the PPW should have been done previously to inform the baseline of the assessment. Ms Brodrick responded explaining that the Applicant has done enough survey work to inform mitigation measures required for the PPW, and that there was no gap or further information required that would lead to different mitigation measures than what is proposed. The ExA suggested that outstanding PPW issues (including trees, surveys and the need for an approval mechanism) be recorded in the Statement of Common Ground. The Applicant was asked to circulate an updated Outline PPW EMP [REP5-106] to Wiltshire Council before Deadline 7 to narrow the remaining disputes to the "in principle" approval question. <i>Post Hearing Note:</i> <i>Please refer to the Applicant's response to Action 16 in the Actions Response Table below.</i> The EA (Lucy Houghton) raised: (i) insufficient clarity on baseline water quality monitoring in the Outline PPW EMP [REP5-106] (including locations, methods and parameters) to establish a true baseline before any ground disturbance; and (ii) discrepancies between Table 3.5 of the Outline PPW EMP [REP5-106] and Table 3.5 of the Outline CEMP [REP6-029], including different buffer distances (10m vs 8m) and emergency spill response provisions. The Applicant noted this point had been raised for the first time at the hearing and requested further discussion with the EA. The PPW includes minor activities such as surveys which Ms Brodrick noted should not be a trigger to start water quality monitoring.
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	The Applicant confirmed it would make further changes to the PPW Plan to make it a standalone document, reducing cross-references to other outline documents, and to submit an updated version at Deadline 7. <i>Post Hearing Note:</i> <i>Please refer to the Applicant's response to Action 11 in the Actions Response Table below.</i> SLD also queried that there was no soil method statement within the PPW Plan. Ms Brodrick acknowledged that it would be best not to cross reference other documents in outline, but the Applicant would look to incorporate more information within a method statement. <i>Post Hearing Note:</i> <i>Please refer to the Applicant's response to Action 11 in the Actions Response Table below. In the case of soil management method statements, these will be site specific and will vary depending on the nature of work and topsoil and subsoil characteristics. A commitment to limiting topsoil stripping and to no long-term storage of topsoil or subsoil has been added to Table 3-11 of the PPW MP. Method statements will remain the responsibility of the contractor.</i> Ms Houghton confirmed EA undertake an array of water quality monitoring around the country and stored and accessible on DEFRA hosted website to search sampling points and observations in the area. SLD should be able to access the relevant network. SB raised that Table 3-13 of the Outline PPW EMP [REP5-106] in relation to ground conditions bullet point 9 states that there is a discovery and inspection strategy to be put in place for the eventuality that any unexpected contamination is encountered. If no approval mechanism for this document, the EA would like to see detail of discovery and inspection strategy included for Deadline 7.
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	Richard Skeffington for SLD noted that data on network typically involves spot samples once a month which does not seem sufficient for automated water quality network. Ms Houghton corrected that she did not mean to imply all data on the website was collected automatically, and that the EA was happy with provisions already included in outline CEMP, due to being consulted on appropriate locations, parameters, frequency and methodology. Mr Barrett confirmed a discovery and inspection strategy will be produced by the contractor but for this management plan the Applicant can provide a higher-level strategy or technical note within the Outline PPW EMP [REP5-106] setting out what the contractor's discovery and inspection strategy for unexpected contamination (currently Table 3.13) must contain, and the steps to be followed. <i>Post Hearing Note:</i> <i>Please refer to the Applicant's response to Action 13 in the Actions Response Table below.</i> The EA queried Table 3-5 of the Outline PPW EMP [REP5-106] and noted that there were references to compounds, material storage, and stockpiles being sited outside of Flood Zone 3B but no mention of storage of plant outside of these areas. Ms Brodrick confirmed that the Applicant would add wording into the PPW Plan requiring that plant and equipment be stored outside Flood Zone 3B when not in operation, aligning with existing wording in the Outline CEMP [REP6-029]. <i>Post Hearing Note:</i> <i>Please refer to the Applicant's response to Action 14 in the Actions Response Table below.</i> Ms Chalaby noted that temporary compounds for the PPW are proposed to include parking areas. These would not be aggregate and vegetation would be cleared. If correct, Ms Chalaby queried how these temporary compound areas are to be treated to prevent surface breaking up and mud being carried onto the highway. Mr Barrett explained that by not using aggregate this was intended to minimise the number of HGVs, as compounds for PPW will be relatively limited in scale and nature. The
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	Applicant agreed to clarify the surfacing treatment for compounds and parking areas (track matting), including measures to prevent mud being deposited on the highway. <i>Post Hearing Note:</i> <i>Please refer to the Applicant's response to Action 15 in the Actions Response Table below.</i>
4. Outline Construction Environmental Management Plan (CEMP) [REP6-029]	The ExA referred to Table 20 in the Outline CEMP [REP6-029] and in particular the equine mitigation where an equestrian expert will be appointed to the community liaison group. The ExA asked the Applicant what the qualifications and relationship with the existing facilities and liaison manager will be. Ms Brodrick noted that the equestrian expert was not present at the hearing, however she responded that the Applicant is mindful that you cannot compel people to be part of a community liaison group and it is the intention of the Applicant to ensure that equestrian interests are heard and there was a mechanism in place whereby equestrian facilities and equestrian users would be represented. The ExA queried the likelihood of construction workers noticing horses in distress, and who would be responsible for identifying when a horse is in distress. Ms Brodrick, for the Applicant, noted that construction workers will be given training on the signs to recognise distress. In response to the ExA's further query on the practicalities of this training whilst working, Mr Threlfall, for the Applicant, noted that these measures have come from the Applicant's veterinary specialist who may be able to respond further in ISH8. However, he noted that the Applicant's intention is that specific training would be undertaken by an equine specialist, either the equine specialist who is the representative on the community liaison group or even by relevant people locally. It would not be down to the individuals on the ground to determine whether what they're doing would impact horses. Instead, there would be clear working procedures that the individuals would understand when they are working in close proximity to the paddocks, for example.

	Mr Threlfall emphasised that this relies upon communication and where works do need to take place in close proximity to paddocks, for example, it would be clearly established with owners in terms of when the work is taking place and what mitigation measures would be available. It would be for the project managers, site managers and possible sub-site managers to monitor these measures. The ExA asked how HGVs are going to avoid horses safely and how this is monitored and controlled. Ms Brodrick, for the Applicant, noted that in the Outline Construction Traffic Management Plan (CTMP) [REP6-041] there are measures for driver training and procedures to follow in the event that they encounter horses on the highway network. The ExA queried the process in the event of a phone call from an equestrian referring to the distance or speed of HGVs on the road impacting their horses. Ms Brodrick noted that there is a complaint procedure in both the Outline CEMP [REP6-029] and the Outline CTMP [REP6-041] as well as the ongoing role of the community liaison group if complaints are felt to not be dealt with appropriately. This is the same procedure in relation to any non-compliance with any of the measures. In response to Stop Lime Down's concerns regarding the treatment of complaints and the recording of these transparently, Ms Brodrick, for the Applicant, agreed with the ExA's suggestion that the measures in the Outline CTMP [REP6-041] regarding acknowledgement by receipt and timescales for response could be included in the Outline CEMP [REP6-029] as well. <i>Post Hearing Note:</i>
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	<i>Please refer to the Applicant's response to Action 9 in the Actions Response Table below. Section 2.15 of the Outline CEMP [EN010168/APP/7.12] (Revision 8) has been updated at Deadline 7 to reflect the complaints procedure set out in the Outline Construction Traffic Management Plan [EN010168/APP/7.22] (Revision 7).</i> In response to Stop Lime Down's query about transparency, Ms Brodrick for the Applicant noted that details of complaints received would be available to the local authority on request and that there is a standing item for the community liaison group relating to complaints to ensure that these are discussed. In response to the ExA's question about how proactive and reactive dust monitoring will be undertaken as part of the Project, Mr William Barrett, on behalf of the Applicant, noted that Table 9 of the Outline CEMP [REP6-029] includes a commitment to increase the frequency of site inspections when activities with a high potential to generate dust are being undertaken and during prolonged dry or windy conditions. He explained that this would help ensure that any dust issues are identified quickly and that appropriate mitigation measures, such as dampening down, can be implemented where required. The ExA queried how the Applicant would determine whether the construction activities relating to the Project are responsible for any increases in dust deposition. Ms Brodrick, for the Applicant, responded that monitoring locations would be agreed with the local authority and that, where practicable, baseline monitoring would commence at least three months before works commenced on site, or before a particular phase commenced. She noted that baseline data would provide a reference point against which subsequent monitoring results could be considered. The ExA referred to Wiltshire Council's Response to the Second Examining Authority Questions [REP6-066] and particularly their changes to the wording around notification of works relating to trees, works to trees in conservation areas and the ability of the Council to consider such works once notified. Mr Threlfall, for the Applicant, noted that a meeting had been scheduled to discuss these points further
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	including clarifying details around what happens after detailed design. It is the Applicant's opinion that a solution can be agreed between the parties. In response to Mr Rohit Singh, on behalf of Wiltshire Council, that arboriculture and hydrology are interrelated and the Outline CEMP [REP6-029] should recognise this relationship and a meta-statement including how features would be protected should be provided, Ms Brodrick, on behalf of the Applicant, noted that these points are being addressed by the management plans and the wording of these are subject to discussion with Wiltshire Council on Monday to ensure agreement. The ExA referred to the submission by National Highways at [REP6-078], with which Wiltshire Council are in agreement, and queried whether the Applicant has anything further to add regarding the use of HDD. Mr Threlfall, on behalf of the Applicant, confirmed that the Applicant has no further response on this from the response provided to those questions (Applicant's Response to the Examining Authority's Second Written Questions [REP5-097]). The Applicant has agreed with National Highways that the inputs, assessment and surveys are all suitable, including the minimum depth of 11.6m, though this is subject to an independent expert and a response is awaited on this topic. In response to Wiltshire Council's query regarding Table 3 of the Outline CEMP [REP6-029], the proposed monitoring of the use of HDD and the actions to be undertaken in the event that monitoring does identify impacts occurring to sensitive features, Ms Brodrick, for the Applicant, noted that in terms of practicality, mitigation measures would be put in place, HDD would commence and then monitoring would be ongoing for sediment release and other impacts. However, it would not be practical to stop the HDD mid-operation and therefore these measures would be focussed on remedial actions that may be required after the HDD has completed its crossing.
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	Ms Fisher, on behalf of Wiltshire Council, requested amendments to the Outline CEMP [REP6-029] to clarify that there will be a protocol in place in the event that HDD monitoring identifies impacts to species and what the protocol would be for such actions going forwards. Ms Brodrick, for the Applicant, confirmed that the management plans contain specific measures where HDD would cease in certain circumstances and there are also measures in the Outline Ecological Protection and Mitigation Strategy (EPMS) [REP6-039] relating to sediment release. The Applicant would consider whether any further wording or cross-referencing between these plans could clarify the position. <i>Post Hearing Note:</i> <i>Please refer to the Applicant's response to Actions 17 and 18 in the Actions Response Table below.</i> The ExA raised a query about the breakout contingency procedure that is to be included in the detailed CEMP to manage accidental releases of drilling fluid. Mr Threlfall, on behalf of the Applicant, confirmed that a full breakout contingency procedure will be developed and produced by the contractor, however, an outline procedure or technical note could be developed to set out the level of detail that will be provided within the breakout contingency procedure and the steps and methods that will be followed. The Applicant noted that this procedure would be reviewed and approved as part of the detailed CEMP. <i>Post Hearing Note:</i> <i>Please refer to the Applicant's response to Action 19 in the Actions Response Table below.</i> In response to comments from Wiltshire Council regarding ensuring that the detailed crossing methodologies include clear restoration objectives, post construction verification of drainage and
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	watercourse function, and a proportionate process for identifying and responding to any unexpected impacts on flood risk, drainage connectivity, or water coast performance, Ms Brodrick, on behalf of the Applicant, noted that these points are already captured with the management plans. The ExA noted that buffers had been agreed for sensitive watercourses with the EA and requested an update from Wiltshire Council in respect of the ordinary watercourse buffers. In response Wiltshire Council, regarding the methodology for maintenance and management of watercourse buffers to mitigate flood risk and water quality issues, Mr William Barrett, for the Applicant, confirmed that an eight metre buffer from ordinary watercourses is agreed and specified in the Outline CEMP [REP6-029]. Mr Josh Rigby, on behalf of the Applicant, confirmed that an eight metre buffer has been applied to ordinary watercourses across the Scheme as a minimum backstop position. Where a watercourse or associated receptor has a higher sensitivity, including for ecological reasons, larger buffers are provided where appropriate. Mr Rigby also noted that the embedded mitigation within the suite of Flood Risk Assessments and Drainage Strategies includes measures to maintain existing drainage corridors and conveyance and to protect watercourses from inappropriate development. Mr Rigby, for the Applicant, confirmed that there is ongoing discussion with Wiltshire Council, as set out at item 3.7.17 of the Statement of Common Ground with Wiltshire Council [REP6-045], regarding watercourse buffers and SuDS. He noted that certain drainage infrastructure, such as outfalls, may necessarily need to interact with a watercourse buffer and that any such interaction would be appropriately designed and managed through the detailed design and relevant consenting process. Mr Jackson, for the Applicant, noted that the Applicant has a series of embedded buffers within the Design Principles and Parameters [REP4-043] as well as within the Outline LEMP [REP6-037] which have been used to design the Project. There is an existing buffer applied to all hedgerows, woodland,
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	and individual trees, for example, which means that the Applicant has applied the buffer to these features at the outset regardless of sensitivity and this has resulted in the layout of the Project as presented in the application. In response to Wiltshire Council's queries regarding the storage of materials on the floodplain, Ms Brodrick, on behalf of the Applicant, confirmed that the Applicant will be making further amendments to the Design Principles and Parameters as set explained at ISH6. Ms Brodrick also referred to the specific measures set out in the Outline CEMP [REP6-029] at table 5 regarding the placement of equipment outside of floodplain areas, so there are additional measures provided to address the Council's concerns in addition to the eight metre buffer. In addition, Ms Brodrick reiterated that there are locations around the Scheme where a greater buffer is being provided for various reasons in terms of proximity to other features. For example, there may be a fifteen metre buffer where there is both a watercourse and another feature that requires a greater distance. Therefore, the Applicant can consider specific wording from Wiltshire Council to address its concerns but it is the position of the Applicant that the protection required is provided for in the management plans. In response to the ExA's query as to whether a guide document could be provided for Wiltshire Council to assist in their understanding of the Outline CEMP [REP6-029] and where measures are located, Ms Brodrick, on behalf of the Applicant, confirmed that the Applicant has had multiple meetings with Mr Singh on this point and has provided a Mitigation Route Map [REP5-102], which serves to bring together the measures across the management plans. The ExA requested further details on what mechanisms in the procurement process will ensure that the Applicant has considered and selected options for minimising greenhouse emissions.
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	Ms Brodrick, on behalf of the Applicant, confirmed that the Applicant is not in position to provide any further updates on the information provided within the Outline CEMP [REP6-029]. Mr Threlfall, on behalf of the Applicant, noted that as a developer and one transitioning to IPP, there are various ESG compliance, due diligence, and internal governance measures that the Applicant is subject to. Whilst not published, there are a number of frameworks that are provided to potential contractors under which they would have to report on their own supply chains and their own procurement processes in terms of greenhouse gases or ethical supply chains. Where any potential risks are identified, the Applicant discusses these with suppliers, and it forms part of the formal tendering process. Every special purchase vehicle, such as Lime Down Solar Park Limited, has its own internal reporting which feeds into the Applicant's corporate reporting on emissions and other similar topics. In addition, Mr Threlfall noted that the Applicant has signed up to the Solar Stewardship Initiative, which ensures ethical procurement and supply chain. It is the Applicant's understanding that there will be a formal reporting process as part of the stewardship scheme, which the Applicant's group reporting procedures would feed into. In response to the ExA's query as to whether the Applicant would consider the appointment of an independent expert to periodically review and report on compliance, Mr Thelfall, on behalf of the Applicant, noted the query and the concerns raised by Wiltshire Council regarding compliance. He reiterated that due to the internal governance and targets, low emission options would be used as much as possible, and the Applicant would be seeking these measures from potential suppliers. In addition, the internal reporting and corporate level reporting on these measures will be published publicly meaning there is a mechanism in place to provide detailed emissions at the Project level. The ExA queried the location of measures committing to the avoidance of the use of sulfur hexafluoride (SF6).
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	Ms Brodrick, on behalf of the Applicant, noted that this was an action for the Applicant arising from CC 2.1 in the Applicant's Response to the Examining Authority's Second Written Questions [REP5-097] and that, at present, there is no information on this topic in the management plans. The ExA requested that a stronger response on the topic of SF6 is provided, especially as the wording of NPS EN-5 is clear on this point and comfort is needed from the Applicant that measures are undertaken to avoid the use of SF6. Mr William Barrett, for the Applicant, noted that the wording in the Outline CEMP [REP6-029] was general in terms of greenhouses gases and the Applicant would consider additional wording that can be added into the Outline CEMP [REP6-029] on this topic. <i>Post Hearing Note:</i> <i>Please refer to the Applicant's response to Action 21 in the Actions Response Table below.</i> The ExA requested clarification as to how the documents that will be submitted as part of the overall CEMP will be discharged and updated if required. Ms Brodrick, for the Applicant, confirmed that the intention is for the detailed CEMP to include the other management plans and that these will be a suite of documents submitted for approval under Requirement 13. She noted that under requirement 3 of the Draft DCO [REP6-005], there is a process that allows the Applicant to submit any amendments to any approved documents, such as the CEMP or any of the specialist plans within the CEMP, and that part of the approved documents could be updated instead of the entire suite as required. In response to Wiltshire Council in respect of contingencies in the event of severe weather impacts on operations, including staff travel, Ms Brodrick confirmed that there is already a commitment in place in the form of an emergency response plan at paragraph 2.12 of the Outline CEMP [REP6-029], which is designed to deal with emergency events. There are also additional measures in relation to flood risk management plans.
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	However, Ms Brodrick noted that in relation to personnel travel during operation there would be minimal people required, and during construction each contractor would have their own acceptable conditions for their staff on site. This would also differ in relation to the work they are conducting, for example a contractor carrying out groundworks will have different safe conditions to a contractor working within the substation. Ms Brodrick suggested that an item on whether Wiltshire Council are referring to business continuity relating to apparatus or personnel be added to discussions schedule next week to assist the Applicant in better responding to the query. In response to Wiltshire Council's request that the Outline CEMP [REP6-029] identify hydrologically sensitive locations, management of cumulative runoff risk across multiple concurrent construction areas, clear trigger levels for additional runoff control, temporary attenuation, and verification that drainage reinstatement and mitigation measures are actually working, and a strategic rather than purely reactive approach to runoff erosion and sediment management, Ms Brodrick for the Applicant confirmed that the Applicant's position is that table 5 of the Outline CEMP [REP6-029] contains measures relating to these issues. In response to Stop Lime Down's queries relating to the reference to a golf hole and references to the Community Liaison Manager as opposed to the Community Liaison Group, Ms Brodrick for the Applicant confirmed that the reference to the golf hole within the Outline CEMP [REP6-029] is correct as the Cable Route Corridor does pass through the edge of a golf course and that the Applicant will review references made to the Community Liaison Manager throughout the Outline CEMP [REP6-029] to ensure these are appropriate for the particular issue. <i>Post Hearing Note:</i> <i>Please refer to the Applicant's response to Action 22 in the Actions Response Table below.</i>
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5. Outline Operational Environmental Management Plan (OEMP) [REP6-031]	The ExA asked for further clarification regarding the use of “significant” relating to replacement activities and the differentiation between different types of replacement and maintenance works. Ms Brodrick, for the Applicant, noted that the Applicant had included in their environmental impact assessment consideration for the more routine activities that would involve replacement of individual broken components, for example, as distinct from the programmed replacement of all of the panels or BESS. The Applicant doesn't anticipate a scenario where an activity would fall between ad hoc replacement or complete replacement, but the Applicant has considered the point raised by Stop Lime Down at GCT 2.6 in their Deadline 6 submission (Stop Lime Down Comments on responses to the ExA's second written questions (ExQ2 and Comments on Deadline 5 submissions [REP6-081])) and have responded to confirm that the Applicant would notify the local authority of any replacement of 10% or more of the BESS units or the solar PV panels in the event that this is required, for example due to an extreme weather event. In response to the ExA's query regarding the location of commitments securing lower levels of noise at receptors R12, R22, R24, R25, R31, R34, R41, R42, and R43, Mr Matthew Muirhead, for the Applicant, confirmed that as set out in the Applicant's Response to the Examining Authority's Second Written Questions [REP5-097] the Applicant has updated ES Volume 1, Chapter 14: Noise and Vibration of the Environmental Statement [REP5-024] and ES Volume 3, Appendix 14-4 Noise Modelling [REP5-063] as opposed to updating Table 8 in the Outline OEMP [REP6-031]. This approach was taken as Table 8 commits to the levels being below those reported in the ES, which has now been updated to include the commitments relating to those receptors. The ExA requested that these commitments are reflected in the Outline OEMP [REP6-031] as well for clarity. <i>Post Hearing Note:</i> <i>Please refer to the Applicant's response to Action 23 in the Actions Response Table below.</i>
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	In response to Wiltshire Council's comments around the inclusion of a sensitive lighting strategy within the detailed OEMP, and why this is not available for review at this stage of the application, Mr William Barrett, on behalf of the Applicant, confirmed that the Applicant would align the wording in table 3 and section 2.7 of the Outline OEMP [REP6-031] for clarity. <i>Post Hearing Note:</i> <i>Please refer to the Applicant's response to Action 24 in the Actions Response Table below.</i> Mr Barrett also highlighted that a sensitive lighting strategy has been provided for the construction phase within the Outline LEMP [REP6-037]. This construction phase strategy provides a frame of reference for what might be included in a sensitive lighting strategy for the operational phase. Wiltshire Council raised a query in relation to the possible exclusion of new badger sets during operation and whether the wording in the Outline OEMP [REP6-031] could be included to clarify whether any other avoidance or mitigation measures would be implemented to avoid the need to exclude the set. Mr Peter Timms, on behalf of the Applicant, confirmed that in the first instance a decision would be made by the Applicant during the operational phase as to whether the badger set can be left undisturbed. However, where the location of the sett and the activities of the badgers are having an impact on the infrastructure, then the Applicant would need to be able to exclude the set. Mr Timms, confirmed that the Applicant would add updated wording to the Outline OEMP [REP6-031] to clarify the application of the mitigation hierarchy to badger setts. <i>Post Hearing Note:</i> <i>Please refer to the Applicant's response to Action 25 in the Actions Response Table below.</i>
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	Wiltshire Council further raised a query around the sufficiency of the adaptive Skylark mitigation section in table 3 of the Outline OEMP [REP6-031], particularly around the trigger points for an investigation of adaptive management or mitigation relating to Skylarks under this measure, and the efficacy of cross-referencing to the Outline LEMP [REP6-037] where a similar level of detail is provided. Mr Timms, on behalf of the Applicant, noted that the Applicant has allocated several areas to be used to provide Skylark mitigation habitat and that the monitoring of the function and efficacy of these habitats will be based on the habitat that is present and the habitat that is delivered. The reason being that Skylark's use of a particular area is dependent on a variety of factors, many of which are completely outside of Applicant's the control, such as the weather conditions during the breeding season or the winter beforehand which may have reduced numbers or the management and rotation of surrounding farmlands. For these reasons, the Applicant has not included trigger points for these measures such as breeding pairs as this is reliant on other factors and it may result in changing the management even where the habitat is ideal. Mr Timms noted that the surveys referred to in the Outline LEMP [REP6-037] and the Outline OEMP [REP6-031] would result in a possible change in the management of the habitat if it is identified that the habitat is not suitable or could be improved or that Skylarks are using fields for foraging but not for breeding, which could result in adaptive measures such as additional cuts to vegetation to encourage breeding. In response to the ExA's query as to the location of the triggers mentioned within the Outline OEMP [REP6-031], Mr Timms, on behalf of the Applicant, noted that these triggers are not referred to specifically in the Outline OEMP [REP6-031] as the intention is that the detailed monitoring requirements and detailed monitoring strategies would be in the detailed management plans, particularly once all of the areas of particular habitats are confirmed. He further notes that the habitat requirements for Skylark are fairly well established in literature.
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	Ms Brodrick, on behalf of the Applicant, noted the comment about the cross-referencing between the Outline OEMP [REP6-031] and Outline LEMP [REP6-037] and that wording could be included to clarify that the detailed LEMP will contain the measures for ensuring that the particular habitat is both established to be suitable and then maintained to be suitable. The Applicant is not able at this stage to set out these detailed measures as the specific locations and planting types have not been confirmed. In response to Wiltshire Council's submissions that clarity is needed in the wording of the Outline OEMP [REP6-031] around when, in the circumstances where a habitat is suitable but Skylark's are not utilising it, adaptive or additional measures will be undertaken to address the lack of uptake, and the ExA's referral to the foraging areas that have been identified including grassy swards for SuDS and monitoring of these, Mr Timms, on behalf of the Applicant, reiterated that monitoring needs to focus on the habitat that is provided. As noted, the habitat requirements for Skylark are fairly well established and any monitoring would assist in understanding whether the habitat being provided in the first instance is suitable and if not, for instance there is a lack of invertebrates and spiders that are vital for Skylarks, then this would trigger the need for adaptive measures. In the event that habitat is provided that is suitable for the Skylarks and they are not using it, then it is almost certainly due to other factors beyond the Applicant's control. The ExA requested clarity on the impact of factors beyond the Applicant's control on the uptake of habitat provision and whether this could be due to a foraging area not being suitable for requirements, Mr Timms, on behalf of the Applicant, noted that where a foraging area is not suitable for requirements or a habitat area has not establish then this would not necessarily be a circumstance where Skylarks aren't using the habitat due to other factors. However, in the circumstance where a habitat is suitable and habitat monitoring has confirmed this and Skylark uptake remains low then this would likely be due to factors outside of site conditions. Ms Brodrick, on behalf of the Applicant, confirmed that the Outline LEMP [REP6-037] contains the measures to establish habitats in the habitat mitigation areas as well as below the panels, and the ongoing ecological monitoring measures are also secured to ensure that the habitats are functioning in
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	the way that is required, both in terms of the specific measures for the habitat management areas and also the grassland underneath the panels. Therefore, the management plans contain both the obligation to put in place suitable habitats and the monitoring and remediation, if required, of the habitats within the Order Limits. In response to the ExA's comments around the contribution to industry learning about the monitoring of these habitats and uptake of Skylarks and other birds in these habitats, and Ms Fisher's comments, on behalf of Wiltshire Council regarding examples of what additional measures will be undertaken if the habitats are unsuitable, Ms Brodrick, on behalf of the Applicant, noted the point around the provision of information and confirmed that a reference to the results of that monitoring being provided to the relevant planning authority can be included in the Outline OEMP [REP6-031]. In addition, the Applicant can ensure that a specific reference to Skylark monitoring is made in the Outline LEMP [REP6-037], as this currently considers various different habitats and a more general ecological monitoring measures, which will help with clarifying what monitoring is being undertaken in relation to Skylark. <i>Post Hearing Note:</i> <i>Please refer to the Applicant's response to Action 26 in the Actions Response Table below.</i> Regarding the point around additional measures, Ms Brodrick, for the Applicant, noted that Mr Timms has set out the Applicant's position and commitment to making sure that the habitat is suitable and any adaptive management measures will be undertaken to ensure that the habitat is suitable going forwards and allows for any changes that might be required to that particular habitat to manage suitability. Ms Brodrick, for the Applicant, confirmed in response to the ExA that these measures will be secured in the detailed documents, which are subject to the local authorities' approval. In response to submissions from Stop Lime Down regarding the necessity for monitoring, Ms Brodrick, for the Applicant, confirmed that monitoring of bird species will be undertaken and this is secured in the
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	LEMP. However, Ms Brodrick noted that the Applicants responses on this point have been related to the limitations as to what the Applicant can do in terms of the activities it can undertake. If it is identified that Skylarks, specifically, have a low uptake of the mitigation, then the Applicant is committing to review the habitat and to make amendments to the habitat to try and improve that, which is the extent of the obligation. In response to a query from the ExA around monitoring of Skylark numbers, Mr Timms, for the Applicant, confirmed that the Applicant would be doing this as it would provide helpful information and confirmation if the mitigation is effective.
6. Outline Landscape and Ecological Management Plan (LEMP) [REP6-037]	The ExA asked for more information in the Outline LEMP [REP6-037] in relation to the water treatment regime, for example what is meant by 'regularly' in year one, the source of that water and how the regularity of watering would be determined for the following years if there is only an annual check of the survival of plants. Mr Jackson, on behalf of the Applicant, noted that it is difficult to give further information relating to the meaning of "regularly" at this stage as to what level of watering would be required as there will be different species that have differing watering rates and watering requirements. This would also be dependent on the climatic conditions of the time, for example, if there is a requirement to water once a week this could be too much during a wet period or possibly not enough during a dry period. The ExA asked whether, rather than a prescription on watering where climatic conditions are unknown, a review in order to determine the regularity of watering can be implemented. Mr Jackson, for the Applicant, noted that as part of the establishment of the plant species set out in the Outline LEMP [REP6-037] there will be a periodic review of weed and weed suppression to ensure the establishment has been sufficient however it would be difficult at this point in time, without a detailed scheme, to be specific around what would be required post-implementation of the planting scheme.

	The ExA then asked for confirmation that in the years following year one there is an annual check on the survival of plans but presumably that this check will need to be more frequent to know how much water they need. Mr Jackson, on behalf of the Applicant, responded that the annual check-in is in regards to establishment and looks at failure rates. This could be as a result of drying out meaning a lack of watering could be a reason for failure, but it might also be a pest or a disease or that the plants have simply not taken. Therefore, the annual audit would look at that lack of establishment and replacement of these plants in line with the detailed scheme as per the requirement of the Outline LEMP [REP6-037] and detailed LEMP. The ExA further raised a query on the source of water for any watering required, particularly regarding drought scenarios, and any restrictions that might be placed on water use. Ms Brodrick, for the Applicant, noted the Outline Water Resources Strategy [APP-290] that has been provided and includes some detail in relation to the ability to provide a connection into the mains at Bristol Water, close to the field A1, meaning that water will be available during the construction phase including the establishment of plants during that phase. It is the Applicant's position that there is sufficient water available locally for this purpose and there are also other options available such as water tankering or using water that is available from abstraction. The ExA asked whether this source would cover anticipated quantities. Ms Brodrick, for the Applicant, noted that this it is the Applicant's position at this stage that there would be sufficient water available however, as noted by Mr Jackson, specific amounts required for the planting regime would depend on the species used and therefore would be better understand following the finalisation of specific plans.
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	In response to Stop Lime Down's concerns regarding the lack of inclusion of water requirements for habitat management in the outline Water Resources Strategy, whether a reasonable worst case estimate can be provided, and consideration for the use of rainwater harvesting, Ms Brodrick, for the Applicant, confirmed that this would be considered by the Applicant. In addition, Stop Lime Down requested that it may be expedient for the Applicant to discuss the figures for quantity of water required with the water boards to understand what they would consider reasonable, to which Ms Brodrick, for the Applicant, confirmed that discussion has been ongoing with the water companies and the point relating to whether the figures that have been quoted are sufficient will be checked and this position can be provided in a statement from the Applicant. <i>Post Hearing Note:</i> <i>Please refer to the Applicant's response to Action 33 in the Actions Response Table below.</i> The ExA referred to the importance of planting to mitigate adverse effects on landscape, visual, ecological and heritage receptors and whether a more regular planting performance review should be set out in relation to the mitigation objectives of that planting, and subsequent adaptation of the management measures that are set out in the Outline LEMP [REP6-037]. Mr Jackson, on behalf of the Applicant, noted that the Outline LEMP [REP6-037] and the subsequent detailed LEMP controls the establishment requirements for the vegetation. This includes a commitment for the lifetime of the scheme to ensure that vegetation is maintained and managed and therefore is given the best change of being successful. It is the Applicant's position that the Outline LEMP [REP6-037], and subsequently the detailed LEMP, would be sufficient to ensure the planting scheme as designed would establish planting and meet the aims of the mitigation for the purposes of the landscape and visual impacts, for example.
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	In response to the ExA's query on growth assumptions, Mr Jackson, on behalf of the Applicant, confirmed that there is a series of assumed growth rates at 0.4m a year or 40cm, which has been established through ongoing consultation discussions with nurseries and growers. However, Mr Jackson noted that these rates remain estimates as some years will incur more growth and others less. Further, Mr Jackson stated that the requirements for the mitigation would be for the planting to reach a certain height in order to provide screening, for example if it is a 4.5m panel that is installed then the planting would need to reach 4.5m to provide mitigation. This is achievable given the size of the plants that are planted within that 10 to 15 year period. Therefore, the mechanisms within the Outline LEMP [REP6-037], and ultimately the detailed LEMP, for establishment and implementation of the planting scheme are sufficient for the planting to reach that point. The ExA noted that it is not just the height of the planting that is measurable but also the density and whether the planting is achieving sufficient density to screen effects and therefore whether an assessment will be done of the planting to understand how well the planting is screening impacts and serving as mitigation. Ms Brodrick, in response to the ExA's question as to whether detail on the efficacy of planting could be put in the detailed LEMP, noted that the LEMP will set out the maintenance and monitoring regimes for the species that have been identified to ensure that they are growing in the way that is required and ensure that any gaps are addressed. The LEMP does not consider the planting from the receptors themselves but establishes the management of the planting. In response to Wiltshire Council's comments around the possible measures that could be sought to ensure adaptive management provides good screening, Mr Jackson, on behalf of the Applicant, referred to discussions that have been had with Wiltshire Council around the adaptive management that could be taken to respond to any failures and changes in climate and being comfortable that within the detailed LEMP there is flexibility to respond to any climatic changes.
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	The ExA sought reassurance that there is sufficient detailed in the Outline LEMP [REP6-037] to offer comfort that these adaptive measures will take place. Mr Jackson, on behalf of the Applicant, confirmed that the general management prescriptions are contained within the Outline LEMP [REP6-037] and will be carried forward into the detailed LEMP, which includes any plants and trees which found to be dying, damaged, diseased, planting will be replaced with the same species and specification for years one to five of the scheme. In addition, there is the requirement that any substantial losses and substantial failures will be looked at in the round. In response to the ExA's question regarding like for like replacement, Mr Jackson, on behalf of the Applicant, noted that like for like replacement can be appropriate on short section of hedgerows where a failure has occurred which needs a replacement immediately. However, in scenarios where a tree is at 40 or 50 years old then it would be impossible to do a like for like replacement and this would involve a comparatively young replacement. Mr Jackson further noted that there are contextual considerations required for replanting, for example, where a section of hedgerow is lost entirely then it might be in those circumstances that the best, long term means of establishment would be to come in with bare root stock and maintain this appropriately under the details in the Outline LEMP [REP6-037]. Mr Jackson noted that fifteen years has been allowed for the EIA assessment, but it might not take 15 years to reach the height required. The ExA asked about a scenario whereby planting has performed well but fails resulting in a significant effect that wouldn't otherwise exist beyond year fifteen and what the balance of priority that would be taken between planting that provides the screening and planting that takes well. Mr Jackson, on behalf of the Applicant, noted that this specific scenario would require a very substantial failure. Would this be for a shorter section of hedgerow, for example, then this would be covered by the management prescriptions of the LEMP and replaced and dealt with for the ongoing management and maintenance of the Project. However, where there would be an isolated or limited field of view or location where planting has been lost, generally noting that the Applicant has typically used woodland belts to serve as screening for the array and associated infrastructure and so such loss would likely be
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	catastrophic and as a result of pest, disease or climate change, then adaptive species selection would be used to consider if there are better options in that location that have not been predicted at this stage. Noting that the intention behind the general management prescription is to support the establishment of the early years of the new planting. The ExA asked about the definition of high proportions in relation to planting at year 5 and whether from year 6 onwards this should be linked to the mitigation purpose being served and the inclusion of a list of specific receptors and how this links to any management of mitigation. Ms Brodrick, for the Applicant, noted that the Applicant's position is that the measures that have been put in place are very standard for projects of this nature in terms of the way in which landscape planting is established and the ongoing obligation to ensure it is maintained as set out in the Outline LEMP [REP6-037]. The Applicant is not proposing to do any further form of assessment work during the operational stage of the development and the measures in the Outline LEMP [REP6-037] are considered suitable and allow for flexibility to respond to the variability that has been discussed. At this stage, the Applicant's view is there is no additional wording that could be added that would allow for this degree of flexibility to be retained going forward though it may be that the detailed LEMP could include more specific detail regarding specific species selected at that stage, for example, where there may be specific monitoring that is applicable. Mr Jackson, on behalf of the Applicant, noted the comment about the meaning of large extents or high proportions of tree fail or plant failure following year five and confirmed the Applicant would respond in writing. In response to the ExA's request to focus on ensuring the establishment of planting in the years 1-5 period, Ms Brodrick confirmed that the Applicant would respond in writing. <i>Post Hearing Note:</i>
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	<i>Please refer to the Applicant's response to Action 30 in the Actions Response Table below.</i> In response to the points raised by Stop Lime Down in respect of wildflower planting on previously arable land, Mr Timms, on behalf of the Applicant, recognised the difficulties of establishing species rich grassland on previously arable land. The measures in the Outline LEMP [REP6-037] are designed to reduce the fertility of the soils, and it is also recognised that the biodiversity net gain metric that has been prepared for the Scheme has a built in time to target condition of 5-10 years depending on baseline standard of the land. The Applicant would maintain that species rich grasslands can be establish by following the measures in the Outline LEMP [REP6-037] and there are case studies where this has been successful on other schemes. <i>Post Hearing Note:</i> <i>The annual Solar Habitat report, published by Solar Energy UK, presents data from ongoing ecological studies of solar farms and provides evidence-based insights into the impacts of solar farm management on biodiversity. The fourth edition of the report includes two case studies demonstrating the successful establishment of botanically rich grassland habitats on formerly cultivated arable land: Southill Solar Farm in Oxfordshire and Bottom Plain Solar Farm in Dorset (Solar Energy UK, 2026. Solar Habitat: Ecological Trends on Solar Farms in the UK. Available at: https://solarenergyuk.org/resource/solar-habitat-2026/)</i> Ms Brodrick, for the Applicant, noted in reference to planting beneath the panels raised by Stop Lime Down in respect of hydrological impacts, that these measures are separate from the planting proposed for the specific areas of wildflower meadow. Therefore, the measures in the Outline LEMP [REP6-037] are specific to the types of habitats being created and how these will be managed meaning that in terms of limited grazing within and amongst the panel areas this would be separate to the wildflower habitats. <i>Post Hearing Note:</i>
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	<i>Please refer to the Applicant's response to Action 31 in the Actions Response Table below.</i> In response to the ExA's query about reducing the competition with weeds in these areas, Mr Timms, on behalf of the Applicant, referred to the outline monitoring strategy within the Outline LEMP [REP6-037] that specifies habitat surveys for all of the habitats for years one, two, three, five and then every five years after that. The results of this monitoring would inform the Applicant as to how the habitats are establishing, particularly during the critical first five year period, and includes measures to reduce weed competition in the context of wildflower meadows. The monitoring can also identify whether additional cutting and collecting of grassland may be appropriate to help speed up the reduction in fertility. In response to the query from Wiltshire Council on hedgerow heights, Mr Jackson, on behalf of the Applicant, noted that there is flexibility in the wording regarding hedgerows due to the nature of the Rochdale envelope meaning that the infrastructure requiring screening could be lower and require lower screening. Therefore, the hedgerows are up to 4.5m in height and the consistency across documents will be checked. <i>Post Hearing Note:</i> <i>Please refer to the Applicant's response to Action 32 in the Actions Response Table below.</i>
7. Outline Ecological Protection and Mitigation Strategy [REP6-039]	Item deferred and not discussed at Issue Specific Hearing 7.
8. Outline Soil Resources	In response to Wiltshire Council's request for further assurance on the soil stockpile locations, Ms Brodrick, for the Applicant, confirmed that the principal of the CNL avoidance areas has been agreed and the specific field will be noted so as to reduce confusion. She noted that for some of the new

Management Plan (SRMP) [REP6-035]	ecological mitigation areas that are being created as part of the Scheme do require cabling to go through them and therefore there would be stockpiling associated with that cabling adjacent to the cabling works. However, once the cable installation has taken place then this will become the ecological mitigation area. Therefore, care is needed on the wording relating to stockpiling to ensure that the Applicant doesn't inadvertently restrict soil stockpiling adjacent to cabling areas. Otherwise, Ms Brodrick confirmed that the Applicant would update the wording to refer to specific areas where stockpiling is restricted. <i>Post Hearing Note:</i> <i>Please refer to the Applicant's response to Action 34 in the Actions Response Table below.</i> In response to Wiltshire Council's identification of gaps between soil and hydrological concerns and a request for links between the plans and documents that refer to drainage issues, Ms Brodrick, for the Applicant, confirmed that cross-references have been added to the drainage strategies in the Outline SRMP [REP6-035], to ongoing monitoring and references to surface water and flooding as well. Ms Sophie Webb, on behalf of the Applicant, responded in relation to the concerns about soil and hydrological impacts and noted that the soil on-site is highly water retentive soil. This means that in terms of overland flows, it will be slowed and that for hydrology and flood risk the soil type on-site is managing this inherently. Regarding monitoring soil compaction, this is set out in the Outline SRMP [REP6-035] in the monitoring procedure section, and includes ongoing monitoring, live monitoring by contractors during construction, during installation of the solar panels and visual inspection of the soil. Where compaction is suspected or it is evidenced, the Applicant has proposed that small hand dug pits are used to investigate exactly where that compaction is occurring and depending on the extent of the compaction, or where it is occurring in the profile, then remediation will be considered. It might be that remediation is not necessary as there will be times where even if compaction is identified, a do noting scenario is more advantageous to allow the soil to remediate itself through natural processes than taking machinery across the land to remediate that section and risk doing more damage to the soils.
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	In addition, Ms Webb noted that as set out at paragraph 1.8.40 monitoring will be undertaken in accordance with the water management plan, which will form part of the detailed CEMP, OEMP, and Decommissioning Strategy. Ms Brodrick noted that the measures requested by Wiltshire Council are included in the Outline SRMP [REP6-035], which would apply across the Site, including the procedure that would be followed for the inspection and monitoring of the soils and how issues are identified and remediated. There are no specific trigger thresholds referred to in the plans as it is an ongoing monitoring exercise, with further investigations and remediation as necessary. Ms Brodrick further stated that the measures proposed are not solely reactive, as suggested by Wiltshire Council, as there is a list of measures that are aimed at trying to prevent compaction occurring in the first instance. It is noted the request for a holistic approach and a strategy but the Applicant's understanding is that any other document would contain the measures that have already been included in the plans for soil management. In response to submissions by Stop Lime Down about taking remedial actions against compaction first, Ms Webb, on behalf of the Applicant, noted that one of the main purposes of the Soil Resources Management Plan is prevention of compaction. Measures in the Outline SRMP [REP6-035] include field tests for soil moisture conditions and ground conditions and also rainfall protocols, which is also part of the live monitoring, meaning that in accordance with the plan, the ground surface should not be traversed when it's wet by machinery avoiding initial compaction. The Soil Resources Management Plan, will minimise, reduce or completely avoid, where possible, compaction. However, where compaction may occur, as it is not possible to predict the weather, there are remediation steps to manage these impacts. But adhering to the plan is going to minimise
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	compaction as far as possible and if the surface is maintained without compaction, then this ensures that vegetation has the best chance of establishing and further reduces compaction. Finally, Ms Webb, noted that there is as much storage of soil on-site as possible because at decommissioning it would be better to use the indigenous soil to restore the land that to sell and buy back what may be needed at the decommissioning phase. In response to Wiltshire Councils remarks regarding the storage of soil near to the phase locations, Ms Brodrick noted that the location of the stockpiles will take into account a lot of different factors and how the soil will be used in terms of the eventual decommissioning will also be a factor taken into account. In relation to the request for drainage to be put in place where soil is stored raised by Mr Singh at Wiltshire Council, Ms Brodrick confirmed that the principle of adding hydrology to the considerations for determining the location of the stockpile can be included if specific amendments are provided by Wiltshire Council.
9. Outline Battery Safety Management Plan [REP3-106]	The ExA raised a query regarding whether the Applicant has modelled pollution concentrations at the equine business locations and whether there is an equivalent acute exposure guideline level (AGEL) for horses that can be referred to. Ms Hannah Dennett, on behalf of the Applicant, noted that the assessment provided in the ES focusses on human receptors and provides the primary basis for the public health criteria that has been applied, including the AGEL thresholds. The modelling demonstrates predicted pollutant concentrations at all assessed receptor locations are well below the respective safety levels and indicate that significant adverse health effects would not be expected at those locations. The closest receptors considered in the assessment include farm buildings and public rights of way, though the assessment has been undertaken at representative human receptor locations rather than equine locations. These receptors were selected to represent worse case exposure locations in the surrounding areas. Ms Dennett noted that the land use in the vicinity of the Scheme is predominantly agricultural with no livestock, equine or

	other receptors identified closer to the proposed BESS than those already assessed. There are also no ecologically designated sites within 1km of the proposed BESS. Therefore, the results are considered to be representative for potential exposure to animals, including horses associated with nearby equine businesses. Ms Dennett confirmed that there is no equivalent AEGL for horses. The Applicant has considered the closest receptors where humans could be present, including farming buildings and public rights of way, and it is their understanding that there aren't any potential areas where horses could be closer. The Applicant has assessed the worst-case locations. The ExA asked for clarification on the separation of firewater and surface water in the event of a fire with reference to the drainage strategy provided by the Applicant. Mr Josh Rigby, on behalf of the Applicant, referred to the Flood Risk Assessment and Outline Drainage Strategy – Lime Down D [REP5-055] and the Firewater Containment and Drainage Strategy – BESS [REP3-118]. Mr Rigby explained that the drainage arrangements for the BESS and substations recognise the potential for contaminated water to enter the surface water drainage system following an incident. Under normal operation, surface water would pass through the drainage system to a controlled outfall, with attenuation provided to manage runoff up to the relevant design event including climate change. In the event of a pollution or firewater incident, the drainage system can be isolated. The relevant containment areas and drainage components would be lined or otherwise impermeable and the outfall would be closed, retaining contaminated water within the system. The firewater containment provision is designed to accommodate the reasonable worst-case firewater volume together with an allowance for a 1 in 10 year rainfall event. Mr Rigby explained that the firewater containment scenario does not additionally assume the coincident occurrence of the 1 in 100 year plus climate change rainfall event. The Applicant considers the simultaneous occurrence of a major BESS fire and that extreme rainfall event to be an unreasonable
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	coincidence for the firewater containment design case. A 1 in 10 year rainfall event has therefore been included alongside the reasonable worst-case firewater volume. As there is no prescriptive guidance for BESS fire prevention, Mr Rigby explained that the Applicant has had regard to the NFCC guidance for grid-scale BESS and the pollution prevention and containment principles in CIRIA C736 in developing the firewater containment approach. Mr Rigby confirmed, in response to the ExA, that contaminated firewater would be contained and subsequently removed by tanker or, where appropriate and subject to the necessary assessment and regulatory requirements, treated prior to controlled discharge. Tankering is expected to be the primary disposal method for materially contaminated water. In response to a query from Stop Lime Down regarding water provision during a BESS fire, Mr Rigby confirmed that the firewater management approach allows for active management of water retained within the isolated containment system. Where appropriate, contained water could be removed during an incident and the system also provides the opportunity for controlled reuse or recirculation of water for firefighting purposes. Mr Rigby confirmed that firefighting water requirements are based on the required flow rate over the relevant duration. Where there is a risk of fire propagation, water may also be required for boundary cooling in accordance with the battery safety and fire response strategy. Mr Gregory, for the Applicant, noted that the outline Battery Safety Management Plan provides an illustrative design contains 556,000 litres of water, which would provide 5 hours of continuous fire hose discharge at 15,000 litres per minute. The Applicant has confirmed that the firefighting water supply on the illustrative design and the pollution containment has been designed on the basis of credible incident scenarios, including the potential for multiple BESS enclosures to be involved and is not limited to routine or minor events. As stipulated in the Outline Battery Safety Management Plan [REP3-106],
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	Section 5.3.2, the firefighting water requirement will be fully assessed at the detailed design stage based upon a comprehensive review of BESS fire and explosion test data for the selected BESS system by an independent fire protection engineer, and water storage volumes will be fully agreed with the Fire and Rescue Service. Section 5.3.2 of the Outline Battery Safety Management Plan [REP3-106] stipulates that the BESS area will be designed to integrate firefighting, to integrate pressure fed pump driven fire hydrants from water tanks. Hydrants will be located in consultation with Dorset and Wiltshire Fire Rescue Service to provide redundancy and safe operating distances for firefighters. These will be easily accessible, and the sighting should be considered as part of a risk assessed approach that considers potential fire development stroke impacts. Mr Rigby, in response to the ExA regarding the interrelationship between the Outline Drainage Strategy [REP4-021, REP5-047 to REP5-050, REP6-010, REP5-053 to REP5-060 and REP3-063], the Firewater Containment and Drainage Strategy – Lime Down D BESS [REP3-118] and the Outline Battery Safety Management Plan [REP3-106], confirmed that the documents are intended to operate together. The Firewater Containment and Drainage Strategy establishes the principles for isolation, containment and management of firewater, which are then incorporated into the detailed drainage design. It does not prescribe a final drainage layout because that will be determined at detailed design. The Outline Drainage Strategy [REP4-021, REP5-047 to REP5-050, REP6-010, REP5-053 to REP5-060 and REP3-063] and the Outline Battery Safety Management Plan [REP3-106] provide the mechanisms through which those principles are carried forward and secured. Mr Rigby confirmed that the isolation arrangements would be explicitly cross-referenced in the Outline Drainage Strategy [REP4-021, REP5-047 to REP5-050, REP6-010, REP5-053 to REP5-060 and REP3-063] so that the detailed drainage design incorporates the isolation and containment principles set out in the Firewater Containment and Drainage Strategy.
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	<i>Post Hearing Note:</i> <i>Please refer to the Applicant's response to Action 37 in the Actions Response Table below.</i> Mr Gregory, on behalf of the Applicant, responded to Stop Lime Down's comments around the basis of the assessment being on one or more than one container to confirm that the volume of firefighting water provided for allows for a time frame that multiple containers did catch fire. However, he noted that typically for BESS containers, the peak of a fire where you might have a propagation risk is typically between one and three hours, but due to the spacing on-site the large scale fire testing has confirmed that propagation does not occur. As set out in the Outline Battery Safety Management Plan [REP3-106] the credibility of multiple BESS containers simultaneously failing has also been considered and is not deemed a credible scenario given the use of approved NFCC spacing requirements within the illustrative design which have been through large scale testing and did not show propagation between containers. In response to the ExA's query regarding post-incident cleansing, Mr Rigby noted that the precise clean-up procedure would depend on the nature and location of the incident and the final detailed design. The Applicant confirmed that following an incident the affected drainage and containment areas would remain isolated while contaminated water is removed or treated, the affected areas would be inspected and cleaned as necessary, and the drainage system would only be returned to normal operation once it had been confirmed that there was no unacceptable risk of pollution. <i>Post Hearing Note:</i> <i>Please refer to the Applicant's response to Action 38 in the Actions Response Table below.</i> In response to the ExA regarding including the lead local flood authority as a consultee to discharge requirements 6, Ms Brodrick confirmed that the lead local flood authority is involved in the approval of
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	the management plan that relates to drainage, whereas the battery safety management plan contains the technical detail around the batteries.
10. Outline Skills, Supply Chain and Employment Plan [REP3-104]	Item deferred and not discussed at Issue Specific Hearing 7.
11. Mitigation Route Map [REP5-102]	Wiltshire Council raised comments on hydrological matters within the Mitigation Route Map [REP5-102]. In response, Ms Brodrick, on behalf of the Applicant, noted that the mitigation route map has been provided to a signposting document that draws together all of the different mitigation measures that are set out in the various different management plans. The Applicant is seeking to avoid duplication of commitments and have committed to measures in the most appropriate plan, for example measures that are contained in the Outline SRMP [REP6-035] relating to soil even though they have a hydrological impact. It is recognised by the Applicant that this is a complex Project and that there are numerous commitments across a wide range of documents. The Applicant has committed to providing Wiltshire Council with financial assistance during the monitoring period to provide support during the discharge of requirements process, this is alongside a Section 106 agreement which is intended to support the Council during the monitoring period of measures agreed within the plans. It is the Applicant's position that the mitigation route map that has been provided does signpost to the correct locations of measures across the documents and that all of the individual mitigation measures that have been proposed are sufficient.

	Ms Brodrick confirmed that the Applicant would update the Mitigation Route Map [REP5-102] to include a column to provide actual paragraph references to particular sections of the management plans. <i>Post Hearing Note:</i> <i>Please refer to the Applicant's response to Action 39 in the Actions Response Table below.</i> In response to the ExA's query regarding how ground and surface water monitoring would be implemented, including reporting and consultation, Mr Rigby, on behalf of the Applicant, noted that monitoring is provided through the Outline CEMP [REP6-029], Outline OEMP [REP6-031], Outline SRMP [REP6-035] and associated detailed plans. During construction, monitoring would include relevant and attributable indicators such as soil condition and compaction, vegetation and ground cover, ponding, erosion, rilling, rutting, channelised runoff, sediment movement and the condition and performance of temporary drainage and runoff controls. Equivalent operational inspections would identify whether corrective action or additional management is required. Mr Rigby explained that monitoring differs between the positively drained infrastructure areas and the panelled areas. For positively drained areas, including BESS, substations and associated hardstanding, runoff is collected within defined drainage catchments and discharged through controlled drainage systems. The performance of those systems can therefore be directly inspected and monitored, including the operation of attenuation, flow controls, outfalls and other drainage components. Mr Rigby noted that the panelled areas are different because they remain predominantly permeable and are not positively drained. The panels are raised above the ground and rainfall is redistributed locally onto the permeable land beneath and between the arrays rather than being collected within a formal drainage network. The Flood Risk Assessment and drainage strategy suite has been developed having regard to paragraph 2.10.76 of NPS EN-3, retaining permeable surfaces, avoiding adverse effects on existing drainage and providing localised drainage measures where necessary.
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	Mr Rigby explained that the relevant indicators within the panelled areas are therefore the factors that control runoff generation and conveyance, including soil condition and compaction, vegetation and ground cover, surface roughness, erosion and rilling, existing drainage features, hydrological connectivity and the formation of preferential or channelised runoff pathways. Monitoring these factors provides an attributable and actionable means of identifying deterioration and implementing corrective measures where necessary. In response to Stop Lime Down's comments regarding water and water-quality monitoring, Mr Rigby, on behalf of the Applicant, confirmed that the Applicant has committed to water-quality monitoring through the Outline CEMP [REP6-029] and Outline OEMP [REP6-031]. Monitoring will be undertaken at appropriate locations and will be supported by inspection of drainage, erosion and sediment controls so that any deterioration attributable to the Scheme can be identified and corrective action taken.
12. Other matters, if required	No other matters were raised.

2 List of Actions for the Applicant and Other Parties following Issue Specific Hearing 7

Number	Responsible party	Action	Submission deadline	Applicant's response / commentary
1.	Applicant	To confirm to the ExA if other NSIP's have consulted on management plans with community liaison groups, including wording in the Development Consent Order (DCO) requiring this, prior to submission to the local authority.	D7	The Applicant has undertaken a search of made DCOs and has not identified any examples where a Community Liaison Group has been expressly required to be consulted on as part of the discharge of requirement process for management plans. To the extent that there has been any informal consultation on such management plans outside of the DCO process, this is not likely to be publicly available information and the Applicant has not identified such examples, but could not say for certain that this has never occurred.
2.	Applicant, Wiltshire Council (WC), Stop Lime Down (SLD)	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,	D7	A draft of the Outline Terms of Reference for the Community Liaison Group was provided to Wiltshire Council and Stop Lime Down for comment on 24 September 2026. Wiltshire Council provided initial comments in a meeting with the Applicant on 28 September 2026 and provided written comments on 29 September 2026. Stop Lime Down provided written comments on 30 September.

Number	Responsible party	Action	Submission deadline	Applicant's response / commentary
		each party is asked to provide its preferred wording for the heads of terms and requirement 4 of the draft DCO.		The Applicant considered the amendments proposed by both parties which are reflected in the Outline Terms of Reference for the Community Liaison Group [EN010168/EXAM/9.91], submitted at Deadline 7. As set out in the Outline Terms of Reference for the Community Liaison Group [EN010168/EXAM/9.91] provision has been made to establish the Community Liaison Group before Requirement 5 is discharged and design related matters are finalised. Furthermore, it also states in paragraph 1.2.3 of the Outline Terms of Reference for the Community Liaison Group [EN010168/EXAM/9.91] that the Community Liaison Group 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”. It should be noted that the Outline CEMP [EN010168/APP/7.12] (Revision 8) make provision for an independent equine expert to be appointed prior to the submission of the detailed CEMP to undertake regular

Number	Responsible party	Action	Submission deadline	Applicant's response / commentary
				engagement and act as a key point of contact with equestrian receptors.
3.	Applicant	To update plan to include wording which limits use of artificial lighting outside of core working hours.	D7	Table 3-3 has been updated to align with Section 2.7 of the Permitted Preliminary Works Environmental Management Plan [EN01068/EXAM/9.63] (Revision 2), to include the commitment to no use of artificial lighting outside core working hours.
4.	Applicant	To update table 3-6 to bolster wording to minimise impact on the setting of heritage assets from storage of materials on site, or other works in proximity to or within the setting of heritage assets.	D7	Table 3-6 of the Permitted Preliminary Works Environmental Management Plan [EN01068/EXAM/9.63] (Revision 2) has been updated in relation to the setting of heritage assets.
5.	Applicant	To provide additional wording in table 3-7 to be included, to make it clearer that the implementation of the measures listed not only apply when a vehicle track crosses a Public Right of Way (PRoW), but also when a	D7	Table 3-7 of the Permitted Preliminary Works Environmental Management Plan [EN01068/EXAM/9.63] (Revision 2) has been updated to clarify that the measures apply both when a vehicle track crosses a PRoW and also when a vehicle track is shared with a PRoW.

Number	Responsible party	Action	Submission deadline	Applicant's response / commentary
		vehicle track is shared with a PRow		
6.	Applicant	To provide further information on the existing access points that will be used for PPW works and confirmation that no highway improvement works are required to facilitate use of those accesses.	D7	For the purposes of Permitted Preliminary Works (PPW), only existing access points will be used. No highway improvement works are required. This is stated in Table 3-7 of the Permitted Preliminary Works Environmental Management Plan [EN01068/EXAM/9.63] (Revision 2).
7.	Applicant	To provide numbers of HGVs anticipated during the PPW phase to WC and SLD.	D7	The number of HGVs anticipated during the permitted preliminary works phase was provided to Wiltshire Council and Stop Lime Down on 28 September 2026. The information has been included within the Permitted Preliminary Works Environmental Management Plan [EN01068/EXAM/9.63] (Revision 2) submitted at Deadline 7.
8.	Applicant	To update the pre-condition survey methodology to the version as detailed in the latest oCTMP.	D7	Table 3-7 of the Permitted Preliminary Works Environmental Management Plan [EN01068/EXAM/9.63] (Revision 2) has been updated to reflect the pre-condition survey methodology set out in the Outline Construction Traffic Management Plan [REP6-041] .

Number	Responsible party	Action	Submission deadline	Applicant's response / commentary
9.	Applicant	To update table 3-12, along with other references to dealing with complaints in various management plans, to include a procedure which requires evidence on how complaints will be logged, responded to and acted upon rather than just received.	D7	A complaints procedure including a process and timeline for logging, investigating and responding to complaints has been added as Section 2.13 of the Permitted Preliminary Works Environmental Management Plan [EN01068/EXAM/9.63] (Revision 2). Table 3-12 and other Management and Mitigation Tables (including Table 3-8 Noise and Vibration and Table 3-9 Air Quality).
10.	Applicant	To provide additional wording in table 3-3 to require submission of ecological survey results to WC and consideration of proposed mitigation to be agreed with WC prior to any potential tree removal or site clearance.	D7	Table 3-3 of the Permitted Preliminary Works Environmental Management Plan [EN01068/EXAM/9.63] (Revision 2) has been updated to include additional commitments and reflect the engagement undertaken with Wiltshire Council on this matter.
11.	Applicant	To amend the PPW environmental management plan, such that no reference is made to outline documents, and it remains as a stand-alone document.	D7	The Preliminary Works Environmental Management Plan [EN01068/EXAM/9.63] (Revision 2) has been amended such that it is a stand-alone plan. Additional material such as ecological and arboricultural method statements have been added as Appendices to the

Number	Responsible party	Action	Submission deadline	Applicant's response / commentary
				Preliminary Works Environmental Management Plan [EN01068/EXAM/9.63] (Revision 2).
12.	Applicant	To review and update as necessary the soil method statement to ensure it does not contain references to the outline management plans.	D7	References to the Outline Soil Management Plans have been removed. Text has been added to Table 3-11 to align with Section 2.1 of the Preliminary Works Environmental Management Plan [EN01068/EXAM/9.63] (Revision 2).
13.	Applicant	To update wording to confirm that a discovery and inspection strategy document will be produced and followed in the event unexpected contamination is encountered.	D7	A discovery and inspection strategy commitment has been added to Table 3-13 of the Preliminary Works Environmental Management Plan [EN01068/EXAM/9.63] (Revision 2). The Outline Discovery and Inspection Strategy has been added as an Appendix to the Preliminary Works Environmental Management Plan [EN01068/EXAM/9.63] (Revision 2).
14.	Applicant	To update wording of table 3-5 to prevent storage of plant machinery and materials in Flood Zone 3b.	D7	A commitment to prevent the storage of plant and materials in Flood Zone 3b has been added to Table 3-5 of the Preliminary Works Environmental Management Plan [EN01068/EXAM/9.63] (Revision 2).
15.	Applicant	To update wording in paragraph 2.9.1 to clarify the surface material of the	D7	Paragraph 2.9.1 of the Preliminary Works Environmental Management Plan [EN01068/EXAM/9.63] (Revision 2) has

Number	Responsible party	Action	Submission deadline	Applicant's response / commentary
		temporary compounds if aggregate is not being used and how the Applicant will prevent mud tracking onto the highway.		been updated to clarify the surface material of the temporary compounds.
16.	Applicant	To update the Statement of Common Ground (SoCG) between Applicant and WC to include any outstanding matters with regards to the PPW environmental management plan.	D7	A meeting was held on 21 September 2026 to discuss final matters in relation to the Preliminary Works Environmental Management Plan [REP5-106] . The Statement of Common Ground with Wiltshire Council [EN010168/EXAM/8.2] (Revision 5) has been updated to reflect those discussions.
17.	Applicant	To update the oCEMP to require the Applicant to notify and agree a mitigation procedure with the Lead Local Flood Authority (LLFA), the Environment Agency (the EA) and other relevant authorities in the event that impacts on a particular species is identified during Horizontal Directional Drilling (HDD) activities.	D7	Table 3 of the Outline CEMP [EN010168/APP/7.12] (Revision 8) has been updated in relation to the notification and agreement of a mitigation procedure with the LLFA and the EA in relation to HDD activities.

Number	Responsible party	Action	Submission deadline	Applicant's response / commentary
18.	Applicant	To review and update, as necessary, all management plan documents to ensure a consistent approach to HDD.	D7	Table 3 of the Outline CEMP [EN010168/APP/7.12] (Revision 8) has been updated to reflect the text set out in the Outline EPMS [REP6-039] relating to HDD monitoring. Moreover, the Applicant has prepared a Breakout Contingency Procedure which is appended to the Outline CEMP submitted at Deadline 7.
19.	Applicant	To provide an overview of the breakout contingency procedure/ technical note to be included in the oCEMP.	D7	The Applicant has prepared a Breakout Contingency Procedure which is appended to the Outline CEMP [EN010168/APP/7.12] (Revision 8), submitted at Deadline 7.
20.	Wiltshire Council	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.	D7	N/A
21.	Applicant	To provide additional wording to be included in the oCEMP, which explicitly confirms applicant's commitment to avoid use of SF6.	D7	The Outline CEMP [EN010168/APP/7.12] (Revision 8) has been updated to state: <i>"The procurement of SF6-free equipment will be prioritised where practicable and the selection of Automatic Identification System (AIS) equipment"</i>

Number	Responsible party	Action	Submission deadline	Applicant's response / commentary
				<i>in the electrical design reduces the need to use SF6 compared to alternative configurations."</i> With regard to providing a stronger response to ExQ2 CC2.1 the Applicant acknowledges the requirement (Paragraphs 2.9.65 and 2.10.15 of NPS EN-5) that, where SF₆-containing equipment is ultimately required, appropriate measures will be implemented for the monitoring and control of fugitive SF₆ emissions in accordance with the applicable F-gas legislation and any successor requirements. In response to NPS EN-5 Paragraphs 2.9.63-64 which state: <i>"Where the development cannot be so conceived, the applicant must provide evidence of their reasoning on this point. Such evidence will include, for instance, an explanation of the alternatives considered, and a case why these alternatives are technically infeasible or require bespoke components that are grossly disproportionate in terms of cost." [...]</i> <i>In particular, an accounting of the cost differential between the SF6 reliant asset and the appropriate SF6-free alternative should be provided."</i>

Number	Responsible party	Action	Submission deadline	Applicant's response / commentary
				The Applicant confirms that SF₆-free equipment will be prioritised through detailed design and procurement. Where a suitable proven and commercially available SF₆-free alternative is not available, or where the procurement of a bespoke alternative would be grossly disproportionate or effects the timely delivery of the Scheme, the use of SF₆ may be necessary for specific items of high-voltage electrical equipment. In these circumstances, the final OEMP will include appropriate measures for the management of any SF₆-containing equipment. These will include, where applicable to the equipment ultimately procured, maintaining an inventory of SF₆-containing equipment and associated SF₆ quantities; appropriate inspection, maintenance and leak detection arrangements; recording and investigation of identified leakage; prompt repair where leakage is identified; and appropriate recovery and handling of SF₆ during maintenance and at end of life. These measures will comply with the applicable F-gas legislation and any successor requirements in force at the relevant time.

Number	Responsible party	Action	Submission deadline	Applicant's response / commentary
				The Outline OEMP [EN010168/APP/7.12] has been updated to secure this commitment at Deadline 7 of Examination.
22.	Applicant	To consider including a commitment where liaison between the Community Liaison Manager (CLM) and CLG occurs prior to final submission of the oCEMP. If not included, provide justification.	D7	The Applicant confirms it will provide the Community Liaison Manager and Community Liaison Group with copies of the final CEMP, rather than prior to submission of the CEMP to the relevant planning authority. The Applicant does not agree that the CLM and CLG would liaise with the Applicant or contractor during drafting of the CEMP on the basis that this activity has the potential to result in delays to implementation of the management plan. However, as set out in the Outline Terms of Reference for the Community Liaison Group [EN010168/EXAM/9.91] provision has been made to establish the Community Liaison Group before Requirement 5 is discharged and design related matters are finalised. Furthermore, it also states in paragraph 1.2.3 of the Outline Terms of Reference for the Community Liaison Group [EN010168/EXAM/9.91] that the Community Liaison Group 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

Number	Responsible party	Action	Submission deadline	Applicant's response / commentary
				<i>identified in the DCO and its management plans / control documents".</i>
23.	Applicant	The commitments contained within ES Chapter 14, in relation to noise levels being reduced to below the LOAEL through the detailed design process, for receptors R12, R22, R25, R31 and R34 to be transposed in to the oOEMP. Similarly the commitment to installing silencers to reduce daytime noise to receptors R24, R41, R42 and R43 to be transposed in to the oOEMP.	D7	Table 8 of the Outline OEMP [EN010168/APP/7.13] (Revision 8) has been updated to state: "Consequently, the Applicant commits that noise at sensitive receptors will be no higher than the levels presented in Section 14.10 of Chapter 14: Noise and Vibration of the ES [EN010168/APP/6.1] and these levels will be set out in the detailed OEMP. <i>This includes a commitment to noise levels being below the LOAEL at R12, R22, R25, R31 and R34 and levels derived from modelling that includes silencers on 17 of the conversion units including those units that would impact R24, R41, R42 and R43.</i>"
24.	Applicant	The sensitive lightning strategy, as detailed in the oOEMP, to be aligned with wording used in other sections and relevant management plans.	D7	The Outline OEMP [REP6-031] already provides details pertaining to a sensitive lighting strategy. A commitment to the sensitive lighting strategy has been added to the Outline Decommissioning Strategy [EN010168/APP/7.14] (Revision 6) in line with the text provided in the Outline OEMP [REP6-031].

Number	Responsible party	Action	Submission deadline	Applicant's response / commentary
25.	Applicant	To include additional wording in the oOEMP to clarify the mitigation hierarchy for badgers, so leaving badger setts in their current location takes priority over other options with licensing being the last resort.	D7	Table 3 of the Outline OEMP [EN010168/APP/7.13] (Revision 8) has been updated to clarify the mitigation hierarchy for badgers.
26.	Applicant	To update the oLEMP to specify that the detailed LEMP to contain further information on the suitable type and condition of skylark habitat, how this will be maintained and potential triggers at which point further steps for mitigation need to be taken to improve the uptake of habitat. The wording regarding the monitoring of breeding pairs should be made clearer.	D7	Table 3 of the Outline OEMP [EN010168/APP/7.13] (Revision 8 and paragraphs 1.3.165, 1.3.167 and 1.4.3 of the Outline LEMP [EN010168/APP/7.18] (Revision 5) have been updated to provide further information and clarification in relation to skylark mitigation.
27.	Wiltshire Council	To provide comment on the Applicant's proposal to inform them of replacement activities	D7	N/A

Number	Responsible party	Action	Submission deadline	Applicant's response / commentary
		equalling or exceeding 10% of any total components.		
28.	Applicant	Firstly, to update the oLEMP to include reference to rainwater harvesting and provide details of an estimate for water requirements in a worst-case scenario and possible source. This should then be included in the Water Resources Strategy. Secondly, to consider how the use of rainwater harvesting measures implemented as SUDS could be used to provide water to support planting establishment and maintenance and ensure that the outline Drainage Strategies are consistent with the outline Water Resources Strategy.	D7	Paragraphs 1.3.22- 1.3.27, 1.3.10 and 1.3.110 – 111 of the Outline LEMP [EN010168/APP/7.18] (Revision 5) have been amended to include reference to rainwater harvesting. The Outline Water Resources Strategy (WRS) [EN010168/APP/7.25] (Revision 2) has been updated in parallel. The Outline WRS sets out that rainwater harvesting would be used opportunistically throughout the lifetime of the Scheme for uses such as landscape establishment watering. It is important to note that as stated in the Outline WRS rainwater harvesting cannot be relied upon for drought resilience, because rainfall availability may be lowest when watering requirements are highest.

Number	Responsible party	Action	Submission deadline	Applicant's response / commentary
29.	Applicant	To inform Wessex Water of the worst-case scenario for water requirement (to include landscaping watering) and confirm agreement. Add consultation with relevant water board as part of the Water Resources Strategy.	D7	Outline Water Resource Strategy [EN010168/APP/7.25] (Revision 2) provides the Scheme's water supply requirements. The Applicant and Wessex Water discussed the water requirement in a meeting held on the 11 September 2026. The Applicant is continuing to consult with Wessex Water regarding the water supply for the scheme and submitted a developer enquiry on 21 September 2026, which includes landscape watering. Consultation with Wessex Water and Bristol Water is included in Outline Water Resource Strategy [EN010168/APP/7.25] (Revision 2).
30.	Applicant	To provide a commitment within the oLEMP so that the detailed LEMP contains details on what is considered failed or not established plant/tree planting, not only in years 1-5, but also beyond this, in which case the Applicant would then need to re-visit mitigation strategy and see what other plant species can be tried instead.	D7	Paragraphs 1.3.16 -18 of the Outline LEMP [EN010168/APP/7.18] (Revision 5) have been updated to include the required commitment.

Number	Responsible party	Action	Submission deadline	Applicant's response / commentary
31.	Applicant	To include in their speaker notes a signpost where in the oLEMP a distinction is made between the area under the solar PV panels and wild flower meadows with respect to management arrangements.	D7	Section 1.3 of the Outline LEMP [EN010168/APP/7.18] (Revision 5) sets out the management arrangements for the areas under Solar PV Panels under the 'Beneath Panel Habitat' subheading. Management arrangements for wildflower meadow are set out under the 'Flower-rich Grassland' subheading.
32.	Applicant	To address inconsistency in terms of hedgerow heights across the various management plans.	D7	Paragraph 1.3.43 of the Outline LEMP [EN010168/APP/7.18] (Revision 5), has been updated to confirm that hedgerows are to be managed at up to 4.5 m in height.
33.	Applicant	To provide details of a watering strategy for new planting considering climate resilience.	D7	The Applicant has updated the Outline LEMP [EN010168/APP/7.18] (Revision 5) to provide further detail on the watering strategy for new planting, taking account of climate resilience. The OLEMP confirms that trees, shrubs, hedgerows, woodland and riparian planting will be subject to establishment watering where required, with the detailed LEMP setting out requirements for each planting phase having regard to planting type and site-specific conditions. Watering will be targeted and adaptive rather than based on a fixed regime, with its frequency and volume informed by monitoring of plant health, soil moisture and prevailing seasonal weather conditions, and factors including rainfall, temperature and evapotranspiration. Water will principally

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				be obtained from the sources identified in the Outline Water Resources Strategy [APP-290] , expected primarily to comprise existing mains supply, supplemented by harvested rainwater where practicable. Measures to improve resilience and reduce watering demand include the use of mulch to retain soil moisture and monitoring of planting establishment, with remedial measures, including replacement planting and the use of alternative species where necessary, should monitoring identify failures arising from changing climatic or other environmental conditions. This adaptive approach will ensure that watering responds appropriately to periods of hot or dry weather and supports the successful establishment and long-term resilience of the Scheme's landscape and ecological planting.
34.	Applicant	To consider inclusion of suggested wording by WC in the oSRMP or include alternative wording, which provide assurance that when determining soil stockpile locations, the following will be considered:	D7	Section 1.8.23 of the Outline Soil Resources Management Plan [EN010168/APP/7.15] (Revision 6) has been updated to reflect the suggestions from Wiltshire Council.
35.	Wiltshire Council	To provide specific measures WC is seeking with regards to	D7	N/A

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		soil management on a strategic level.		
36.	Wiltshire Council	To confirm if they are satisfied with the Applicant's response at deadline 6 (DCO2.1ak [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.	D7	N/A
37.	Applicant	To verify and confirm that the management of firewater isolation systems is included in other drainage and relevant management plans.	D7	The Applicant can confirm that the management of firewater isolation systems as set out in ES Volume 3 Appendix 11-6 Flood Risk Assessment and Drainage Strategy Lime Down D [REP5-055] refers to the Outline BSMP [REP3-106] .
38.	Applicant	To include a commitment in the outline Drainage Strategy and outline Battery Safety	D7	The Firewater Containment and Drainage Strategy – Lime Down D Battery Energy Storage System [EN010168/EXAM/9.8] (Revision 3) and the Firewater

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		Management Plan to ensure that the isolation area is cleaned after a fire to ensure that surface water is not contaminated.		Containment and Drainage Strategy – Substations [EN010168/EXAM/9.9] (Revision 3) have been updated to clarify the isolation procedure.
39.	Applicant	To update the Mitigation Route Map so it includes references to the relevant paragraph numbers within the various management plans that refer to managing hydrology. To ensure the Applicant addresses the LLFA points regarding the scope of the Hydrological Verification Framework.	D7	The Mitigation Route Map [EN010168/EXAM/9.59] (Revision 2) has been updated to include references to table and / or page numbers in the relevant outline management plan documents. A cross check of all chapters and appendices that have been updated since D5 has been made and additional mitigation has been included in the Mitigation Route Map [EN010168/EXAM/9.59] (Revision 2) (refer to Revision 2 tracked change version). Subsequent to ISH7, the LLFA provided a spreadsheet with suggested additional mitigation and commitments. The Applicant has reviewed and considered the mitigation. A number of the measures suggested are contained within the Flood Risk Assessment and Drainage Strategies; others are either not agreed or would be subject to discussion as part of the development of the scheme design in accordance with Requirement 5 Detailed Design approval and Requirement 11 Surface and Foul Water Drainage. The Applicant refers to Table 3-5 of the Mitigation Route Map [EN010168/EXAM/9.59] (Revision 2) which sets out

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				the mitigation in relation to Hydrology, Flood Risk and Drainage and how that mitigation is secured. A Hydrological Verification Framework is not required as it would comprise a document that duplicates both the mitigation as well as the suite of agreed management and control documents listed within Table 2-1 and Tables 3-1 to 3-15 of the Mitigation Route Map [EN010168/EXAM/9.59] (Revision 2). Furthermore, the Applicant notes that in the latest version of the Statement of Common Ground with Wiltshire Council [EN010168/EXAM/8.1] (Revision 5) that the LLFA no longer considers that a hydrological verification framework is required.